

ANNUAL REVIEW OF DFID SUPPORT TO
THE ANTI-CORRUPTION COMMISSION PHASE 2
IN SIERRA LEONE

REPORT BASED ON EVALUATION OF REVIEW TEAM AND INTERVIEWS IN
SIERRA LEONE

FROM 29 NOVEMBER – 7 DECEMBER 2006

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25 January 2007

LIST OF ACRONYMS AND ABBREVIATIONS

AC	Anti Corruption
ACA	Anti Corruption Act 2001
ACC	Anti Corruption Commission
AR 2005	Annual Review of the ACC 2005
CCS	Control of Corruption Score
CGG	Campaign for Good Governance
CPI	Corruption Perception Index
CSO	Civil Society Organisation
DBS	Doing Business Survey
DecSec	Decentralisation Secretariat, Ministry of Local Government and Community Development
DFID	Department for International Development
EITI	Extractive Industries Transparency Initiative
ENCISS	Enhancing the Interaction between Civil Society and State
EU	European Union
GAC	Governance and Anti-Corruption Strategy, October 2003
GOSL	Government of Sierra Leone
GRS	Governance Reform Secretariat, Ministry of Presidential Affairs
GTZ	Deutsche Gesellschaft für Technische Zusammenarbeit
IGAP	Improved Governance and Accountability Pact 2006
JSDP	Justice Sector Development Programme
MFR	Management and Functional Reviews of Ministries
MOV	Means of Verification of an OVI
NACS	National Anti-Corruption Strategy
NAG	National Accountability Group
NGO	Non-Governmental Organisation
ONS	Office of National Security
OVI	Objectively Verifiable Indicator of the ACC Project Memorandum
PETS	Public Expenditure Tracking Survey
PFM	Public Financial Management
PSR	Public Sector Reform
SDPS	Service Delivery and Perception Survey
SLACP	Sierra Leone Anti-Corruption Project
SLP	Sierra Leone Police
SSR	Security Sector Review
TCM	Tasking and Coordination Meetings of the ACC
TWG	Technical Working Group
TI	Transparency International
UNDP	United Nations Development Programme
WB	World Bank

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EXECUTIVE SUMMARY

Scope of work:

The review team's TORs were to assess the ACC's progress during 2005-2006 against the Project Memorandum and Logframe Outputs. In addition, the team was asked to evaluate how the ACC had performed against the 2006 agreed benchmarks, to what degree progress had been made in implementing the recommendations of the 2005 annual review, and to make recommendations on DFID's future support to the ACC.

Key Findings:

- **Lack of progress on the overall project goal of reducing corruption in Sierra Leone:**

The overall goal of the project to which the four Output Areas relate is defined as "Corruption in Sierra Leone Reduced" with four indicators measured against international (with specific mention of Transparency International's Corruption Perception Index – the CPI) and national corruption surveys. International perceptions place Sierra Leone among the worst performers globally, with no change in indicators where comparison with previous years is possible. The ACC is the organisation which is at the centre of the national anti-corruption strategy and thus should play a major part in this goal. However, the team found a lack of activity in:

- Developing measures of performance in the Sierra Leonean context
 - Carrying out Sierra Leone specific studies and surveys; and
 - Engagement with other governance pillars and AC stakeholders in fighting corruption,
- **Little or no impact by the ACC on reduction of real or perceived levels of corruption:**

National surveys that relate to anti-corruption (for example the Service Delivery perception Survey 2006) or include corruption factors (for example the 2004 Security Sector Review - SSR) show **little or no impact of the ACC on Sierra Leoneans' perceptions of levels of corruption or on real reduction of corruption** affecting public funds, basic service delivery, and the private sector. Of particular concern is the SSR revalidation because this clearly shows that corruption is seen as a key threat to Sierra Leone's peace and stability by ordinary people.

- **Deterioration in the institutional capacity of the ACC to lead the fight against corruption:**

The project purpose relates to the organisational capacity of the ACC to be the lead agency in fighting corruption in Sierra Leone. **Inward focus** has resulted in no movement or prospect of movement in easing significant external constraints to the work of the ACC, such as delays in the Attorney General's Office or the ineligibility of the Auditor General to publish reports under parliamentary Standing Order 75.

The October 2006 Draft of the Audit of the DFID funds to the ACC for the period March 2004 to August 2006 found 32 key issues, of which 22 had a high implementation priority. Six of the issues (five of high priority and one medium priority) related to DFID communication of information on account procedures. The remaining 26 relate to the ACC, of which 17 are high priority, seven medium and two

low. This would seem to indicate an organisation with serious management problems.

There was a **significant under-spend of more than £750,000** confirmed during the review. It will be difficult to spend this money on effective, targeted anti-corruption activities in the three months remaining for DFID support. This degree of under-utilisation of funds suggests that work relevant to the achievement of the operational plan in investigations, preventions and community relations is not being carried out.

Cessation of Tasking and Coordination Meetings which had been instituted in 2005 to bring together heads of different departments to review current operations, share information and facilitate prioritisation reflect a general departure from a transparent, accountable management style. Minutes from monthly Management Meetings reveal an inward bureaucratic focus. In the period under review there has been a lack of a dynamic, results-oriented organisational culture that could enable the ACC to make headway in its difficult operational context.

- **Minimal progress in output areas:**

There has been **minimal progress in all four output areas**. Although the Prevention and Community Relations Department has been active during the review year there is no clear evidence of community mobilisation (Output 1). While the efforts of the department are laudable, monitoring and assessment are in terms of the volume of activities, whether jingle and programmes have been aired, or clubs formed and there has been no real impact assessment of these activities in terms of whether and how they have changed people's behaviour, despite recommendations calling for such assessments (cf. DFID's comments on the ACC strategic plan 2006-2007).

Recent prevention activities (Output 2) have centred on an internal review of the National Anti-Corruption Strategy (NACS) being carried out by the Technical Working Group (TWG) developing the implementation strategy for the NACS. However, the development of the implementation strategy only started in November 2006 - over a year and a half after the NACS was published in March 2005 - and the TWG will likely be unable to achieve the target of end 2006 for its finalisation as agreed in the Improved Governance and Accountability pact (IGAP), July 2006. The strategy for prevention has changed since the reinstatement of the present Director for Prevention and Community Relations. The rationale for this shift is not clear and it has meant a slowing down in prevention activities.

- **No progress on high-level Prosecutions**

The need for progress in processing high public interest investigations for prosecutions has been the repeated subject of discussion and agreements. However, there are low numbers and generally low or medium profiles of prosecutions (Output 3). There have been no high level prosecutions during the review period. Only two of the seven cases forwarded for prosecution in 2006 originated from investigations initiated in 2006, the remaining five relating to pre-2005 cases. There was an improvement in case investigation times from 2005, but 70 per cent of cases are still taking too long to investigate (an average of 146 days, or one and a half times the target 90 day period). No policy has been developed to help investigation staff prioritise cases. In the absence of a policy framework and effective oversight, decisions made on closing cases are prone to charges of lack of accountability and transparency.

- **Public perceptions of corruption are not being measured by the ACC**

There have been no surveys carried out on national perceptions of corruption, or analyses of changes in public/stakeholder perception (Output 4). This is one of the critical failings of the ACC during 2006. Inward organisational focus, lack of alliances with other pillars of governance, and the significant under-spend of the budget this year (implying inactivity in fighting corruption) make it unlikely that there will be any progress during 2007 in this essential area. This failing will impact on other activities of the ACC, as they will be undertaken in the absence of objective knowledge and baseline data.

- **Little progress or reversals in implementing the recommendations of the 2005 Annual Review:**

There has been very little real progress in achieving the recommendations of the 2005 Annual Review. In fact some of the positive achievements outlined in the 2005 review have been negated or reversed. These included progress in Strategic Planning (now non-existent) and cancellation of fortnightly Tasking and Coordination (TCM) meetings. Five of the recommendations have been partly achieved, three not achieved. However, of the partially achieved recommendations, two are questionable in terms of the quality of the activity (reform of the Act, monthly press/media conferences), one (mentoring/staff development) is unsustainable, and one (decentralisation) combines progress and regression in that decentralisation of office to Bo has occurred but Freetown maintains control over budget and expenditure of the Bo office. Decentralisation to Makeni is planned and Kenema is lagging behind.

- **Progress against the April 2006 Results Framework limited:**

Over and above the benchmarks already laid down in the Project Memorandum, high level discussions were held in April 2006 between the British government and GoSL on the need for Sierra Leone to demonstrate concrete results in combating corruption. A 'Results Framework' was agreed for the ACC which would also serve to promote ownership by the new Commissioner over the organisation's activities. Progress against these benchmarks has been very limited. Only the development of a costed strategic plan (Strategy) and clearing the backlog of old cases (Investigations) can be seen to have been satisfactorily achieved.

- **Timely progress on AC benchmarks contained in IGAP is unlikely**

The latest in the series of benchmarks agreed between GoSL and its partners is the Improved Governance and Accountability Pact (IGAP), dated 18 July 2006. IGAP is an agreement between GoSL and four development partners providing direct budget support - the African Development Bank, the Department for International Development, the European Commission and the World Bank - to "take forward ten critical governance and accountability reforms over the coming year until July 2007". None of the agreed actions under Priority Reform 1 on Anti-Corruption are on track for achievement by the target date, despite the fact that none of them are new, but have already been the subject of different benchmarks and agreements.

- **The external environment for the ACC remains difficult**

The difficult external environment within which the ACC operates has not changed. Problems with the Attorney General's Office and delays in the prosecutions remain,

and have not significantly improved with the 'fiat' system put in place in mid-2006. The ACC can be seen to be falling into the common pattern of African Anti-Corruption Commissions, despite DFID's manifest attempt to learn from experiences of other African ACC's.

The primary issue is whether the ACC in its present form can achieve the objectives which have been set out for it. It is also necessary to examine whether the objectives which have been set out for the Commission are appropriate in a fragile state context. As pointed out in this and previous studies more successes in dealing with corruption have been achieved through more systemic interventions. In a context of high corruption and weak institutions, focussing on achieving results through an Anti-Corruption Commission has been a difficult strategy to implement.

Without the functioning support institutions (in particular an incorrupt Judiciary, functioning Attorney General's Office, functioning and effective Auditor General's Office empowered to publish its reports regardless of Parliamentary debate, an effective Parliament, incorrupt police force, and strong independent media and civil society) the ACC cannot operate effectively.

The ACC has deteriorated in terms of its effectiveness, capacity, and in the morale of its staff. There has been a history of repeated attempts and investment of resources to address the issues which beset the ACC, all of which have failed or not been implemented with enough commitment. UK development funds could be more productively spent on more promising approaches to endemic corruption which continues to pose a major threat to Sierra Leone's hard-won peace and stability.

Recommendations:

The review therefore recommends that DFID **does not continue support to the ACC Sierra Leone, but broadens and integrates its anti-corruption efforts into existing programmes, and develops alternative avenues for supporting anticorruption activities**, including:

- Considering how AC activities could be integrated into justice and security sector, reform programmes;
- Considering introducing new prevention measures into civil service reforms, such as designing and implementing vetting procedures for key positions in the wider public sector as well as to security services;
- Continuing to support corruption preventive measures such as improved records management, payroll verification, improved public financial management and procurement reform;
- Increasing the focus on activities to increase citizens' demand for greater accountability, including through support to civil society and the media, and specifically in relation to local government (around transparency clauses in the 2004 Local Government Act) and developing open transparent systems in chieftain governance through DFID's support to the decentralisation process and working with civil society;
- Supporting civil society to independently monitor the implementation of national anti-corruption programmes;
- Targeting the private sector, in particular removing obstacles to inward investment, and sharing best practice/achievements, including consideration of partnerships with professional, industrial, and commercial associations.

INTRODUCTION:

BACKGROUND

In 2005 DFID carried out an Annual Review of the ACC which identified progress, continuing challenges/constraints, and made recommendations to be carried out during the current review period.

Eight recommendations were made covering building and improving relations with government and other stakeholders, decentralisation and forming local-level linkages, organisational capacity building, integrating the National Anti-Corruption Strategy with wider governance reforms, greater focus on prevention and point of service corruption, and capacity building of the advisory committee.

In November 2005, HE the President appointed Professor Joko-Smart as Commissioner.

With a view to better coordination of donors' and government's interventions on tackling corruption, DFID commissioned a 'Way Forward' study by a multidisciplinary team in July 2006. Looking at Sierra Leone's context, this recommended a broad-based approach to supporting and accelerating anti-corruption reform efforts by government, DFID and other donors.

At the same time in order to move forward on prioritising and implementing key governance and accountability reforms, GoSL and its donor partners DFID, the EC, African Development Bank and the World Bank agreed to governance benchmarks. DFID and the GOSL agreed specific benchmarks for the ACC in August 2006.

As well as constituting a 'normal' annual review of a project, this annual review was undertaken to assess progress against the backdrop of these recent development, but perhaps more importantly, the review was intended to take a 'forward look', to assess the feasibility and suitability of future DFID support to the ACC, given recent trends.

SCOPE OF WORK

Besides assessing the ACC's progress during 2005-2006 against the Project Memorandum and Logframe Outputs, the team was asked to evaluate how the ACC had performed against the 2006 agreed benchmarks, and to what degree progress had been made in implementing the recommendations of the 2005 annual review.

The two main objectives were:

1. **To review progress and achievements since August 2005 by:**
 - assessing progress in the four broad output areas (community mobilization, prevention, prosecutions and perceptions on corruption);
 - assessing implementation of recommendations of the 2005 Annual Review;
 - assessing progress against the 2006 Results Framework (benchmarks jointly agreed by DFID and ACC in April 2006);
 - reviewing the findings of the recently undertaken Audit.
2. **To make recommendations regarding future DFID support to the ACC following the end of phase 2 by:**

- reviewing the strategic plan 2006-2007 and making recommendations on how DFID might support these plans after March 2007; and
- discussing the anti-corruption agenda with all stakeholders (ACC, DFID staff, GoSL, civil society, other donors)

The team comprised Gladwell Otieno (Independent Consultant, Kenya), and Joel Cutting (Independent Consultant, UK). Mrs Neneh Dabo, Head of Prevention and Community Relations of the ACC was appointed to the team on Thursday 30th November (two working days prior to the review end) by the Commissioner. Wider stakeholders were consulted from the public and private sectors, and from local NGOs, the media and civil society.

The review team used a combination of:

- Desk review of previous project documents relating to the ACC, including the draft 2006 Audit of the ACC by Pricewaterhouse Coopers and the 2005 Annual Review of the ACC, reports and surveys on corruption in Sierra Leone, the report on the Way Forward for (2006) and wider literature on corruption in Africa,.
- Analysis of international corruption indicators, data on cases investigated during and prior to the review period, minutes of management meetings held by the ACC and memos from the Commissioner
- Interviews with stakeholders from government, the private sector, civil society, the Justice Sector Development and Public Sector Reform Programmes, the Judiciary, and Decentralisation Secretariat.

The team was assisted by Charlotte Duncan (Governance Adviser, DFID SL), Denise Hill (Programme Manager, DFID SL) Abraham Turay (Assistant Programme Manager, DFID SL), and Ada Halloway (Programme Assistant, DFID SL).

The scoring was agreed at the end of a full Annual Review which included interviews with all key stakeholders in the fight against corruption in Sierra Leone.

METHODOLOGY AND CONSTRAINTS

A serious constraint facing the review team was lack of collaboration by the Commissioner of the ACC.

The TORs proposed a team of three consultants, two appointed by DFID and one by the ACC. The international consultant planned for the review by DFID to work with Gladwell Otieno unfortunately had to cancel for personal reasons and be replaced by Joel Cutting. This resulted in the review date slipping from September to December. This meant that the appointee selected by the ACC was unfortunately not available in country during the chosen review period. The Commissioner had been informed of the new dates and asked to provide a replacement by DFID, in advance of the review date, however, he was of the view that no replacement would suffice. In an attempt to resolve this issue, DFID finally suggested that the Commissioner appoint a member of his staff to accompany the consultants. The Commissioner ultimately agreed to appoint the Head of Prevention and Community Relations, Mrs Dabo, to the team, two working days prior to the end of the consultancy.

On arrival, after the DFID Governance Advisor introduced the two international consultants to the Commissioner and his Department Heads, the review team was

refused permission to speak to Heads of Department on a one-to-one basis. This was followed by refusal to allow the staff to speak to the team at all. Only after high-level interventions, did the Commissioner agree to allow his staff to meet the team, albeit in his presence and as a group, and at the end of the review period on the day one of the consultants was leaving. However, it was possible to interview the Head of the Prevention Department when she was assigned at a late stage to the team, and the International Advisor to the Investigations Department.

The review team also consulted with a wide range of external anti-corruption stakeholders, including relevant government departments and organisations, civil society, the media, and the private sector.

The team examined a variety of documents relating to the ACC's performance, including the draft audit carried out by Price Waterhouse and relevant surveys and reports from external sources. However, the majority of ACC internal documentation was only provided towards the end of the mission during the time set aside for wrap up and drafting. A list of documents consulted is given in Appendix 1.

A brief wrap up meeting was held with the Vice President on Monday December 5th.

REVIEW OF PROGRESS SINCE 2005 ANNUAL REVIEW

Similar to the previous annual reviews the 2006 review assessed achievements and made a series of recommendations aimed at improving the work of the ACC. The following section reviews progress in the four project output areas of the strategic plan.

ASSESSMENT OF PROGRESS IN FOUR PROJECT OUTPUT AREAS

Introductory comments – Achievement of the Project Goal: The overall goal of the project to which the four Output Areas relate is defined as "Corruption in Sierra Leone Reduced" with four indicators measured against international (with specific mention of Transparency International's Corruption Perception Index – the CPI) and national corruption surveys. The Objectively Verifiable Indicators are:

- Improving national and international perception of the incidence of corruption;
- Diversion and misappropriation of government resources reduced;
- Services more efficiently and effectively delivered, especially to the poor; and
- Private sector shows less evidence of corrupt practices.

National and international perceptions of the incidence of corruption

International Indicators:

International perceptions place Sierra Leone among the worst performers globally, with no change or decline in indicators where comparison with previous years is possible.

Table 1: International Governance Indicators

Corruption Perception Index (CPI): This is a composite index from Transparency International (TI) based on multiple expert opinion surveys which ranks countries between 0 (worst perceived levels of corruption) and 10 (least perceived level of corruption). Sierra Leone is within the bottom 5 countries internationally. There has been no significant change (slight decline) in CPI from 2004 to 2006, given the margin of confidence in assessing the CPI for the country.

2006: Score 2.2

2005: Score 2.4

2004: Score 2.3

Worldwide Governance Indicators (WGI) Control of Corruption Score (CCS): This is a World Bank (WB) measure focussing on systemic procedures to control corruption. It estimates a score per country ranging from -2.5 (worst) to +2.5 (best), and gives a percentile rank (0 being the bottom, 100 the top). Sierra Leone can be seen to have dropped from the borderline bottom quarter of all countries to within the bottom fifth for the Control of Corruption.

2006: Estimate: n/a Percentile Rank: n/a

2005: Estimate: -0.99 Percentile Rank:17.2

2004: Estimate: -0.80 Percentile Rank:25.5

The WB's **Doing Business Survey (DBS)** which is relevant to private sector perceptions puts Sierra Leone at the eighth worst position internationally, dropping five places from the previous year.

In particular, bureaucracy surrounding employment, property registration, licensing, trading across borders and enforcing contracts is especially lengthy. Private sector informants stated that these complex procedures create opportunities for public officials to demand bribes when dealing with companies. There are particular problems with Customs¹ and licensing (MFRs of Ministries of Mineral Resources and Fisheries and Marine Resources, DFID 2005).

2006: 168 out of 175.

2005: 162 out of 175

2004: not ranked

These governance indicators provide important information, particularly on Sierra Leone's attractiveness as an investment destination. It is important to recognise that it is usually difficult to establish a direct causal relationship between the activities of an anti corruption agency to changes in these and most similar governance indicators². Therefore the appropriateness of this OVI as a direct measure of the performance of the ACC is to be cautiously assessed. Nevertheless, the WB's Control of Corruption Indicator, for example, is a measure of systemic procedures to control corruption which saw Sierra Leone slip down into the lowest fifth for the

¹ Personal communication

² Cf. Patrick Meagher, Anti-Corruption Agencies: Rhetoric or Reality in the Journal of Policy Reform vol. 8, No. 1, 69 – 103, March 2005

control of corruption. Proactive leadership could engage in raising awareness these indicators and their appropriate interpretation as well as focussing on developing measures of performance in the Sierra Leonean context, beginning with the creation of baseline data which could eventually allow a more contextually relevant assessment of the ACC's performance over time.

It was noticeable that the ACC did not have any stated comment on Sierra Leone's performance in these international indicators, what the figures mean for the fight on corruption, or how the ACC would be working to try and improve Sierra Leone's position and performance in them.

National indicators:

In terms of the OVIs on service delivery and reduction in misappropriation of government resources, and on national perceptions of corruption where there is not much knowledge of international indicators, national surveys are more indicative. Unfortunately, the recent Household Corruption Perception Survey for 2006 by the National Accountability Group (a national NGO and the Sierra Leonean TI representative) was unpublished before the end of the consultancy period. However, surveys that do exist show little or no reduction in Sierra Leoneans' perceptions of levels of corruption or real reduction of corruption affecting public funds, basic service delivery, and the private sector.

Table 2: Studies/Surveys relating to national perceptions of corruption and the four Project Goal OVIs

<p><i>Surveys relating to perceptions and attitudes to corruption</i></p> <p>Security Sector Review (SSR) 2004 placed corruption top of people's perceived threats to peace and stability. The 2006 re-validation of the SSR showed no change in this perception (source Office of National Security).</p>
<p><i>Surveys relating to misappropriation/misuse of public funds</i></p> <p>Audit Reports from the Auditor General's Office are produced but unpublished. The ACC has not used its authority to lobby for the repeal of Standing Order 75 which blocks the publication of the audits. Audit reports are a key tool in investigating matters pertaining to OVI 2.</p> <p>The 2004 Public Expenditure Tracking Survey (PETS) Report published in 2006 reported:</p> <ul style="list-style-type: none"> • Some improvement in the Education sector, although transfer discrepancies still occur (11 per cent of text books, 33 per cent of books with SABABU project, 10.5 per cent of schools fees subsidies) • A grey area in Agriculture where tracking delivery of seed rice (Leones 3.2 billion) was not possible as Agricultural Business Units were not functioning in all chiefdoms • Improvement in procurement and delivery of essential drugs, although transfer discrepancies remain especially where delivery is via contractor(15.3 million Leones accounting discrepancy for Peripheral Health Units and 12 million Leones for Secondary and Tertiary hospitals) <p>However, it is considered that the achievements in improving public expenditure flows in two of the three Ministries covered by the PETS could not really be attributed to ACC activity, but are more likely to be due to internal efforts by the Ministries. The Ministry of Health's significant improvement is due to the adoption of a Direct Delivery System (<i>source 2004 PETS 2006</i>). There is no clear linkage between PETS and ACC for follow-up work.</p> <p>Ongoing Management and Functional Reviews of Ministries as part of the Public Sector Reform programme have uncovered a number of issues relating to corruption, such as:</p> <ul style="list-style-type: none"> • Ghost workers • Lack of policies and programmatic approaches leading to the phenomenon of

<p>multiplying bureaucratic units to address sector issues</p> <ul style="list-style-type: none"> • Overlaps between Ministries, between Ministries and Commissions/Agencies, and between departments within Ministries resulting in inefficient use of scarce resources • Problems with revenue generating MDAs, particularly in the area of licensing (Mineral Resources, and Fisheries/Marine Resources) <p>(source Governance Reform Secretariat, PAI)</p>
<p><i>Surveys/studies relating to corruption's impact on pro-poor service delivery</i></p>
<p>The Service Delivery and Perception Survey 2006 (SDPS) looked at the efficiency and effectiveness of public service delivery in Education, Health and Agriculture, and the impact of services on beneficiaries. It found that</p> <p>In Education</p> <ul style="list-style-type: none"> • Illegal charges for extra lessons and obligatory gifts were widespread. Half of respondents nationwide could not afford (illegal) school fees, and were burdened with 'a host of other charges' • Despite improvements in resource flows to schools following PETS studies, there was widespread ignorance among households both as to whether resources reached schools and what funds were used for. There is a significant gap in communities holding their education service providers accountable <p>In Health, GOSL policy stipulates free consultations, drugs, and essential vaccines for disadvantaged groups, with common drugs provided at an affordable cost recovery basis to the public. However,</p> <ul style="list-style-type: none"> • 21 per cent of respondents reported paying for basic vaccines • Over 50 per cent of respondents found the cost of healthcare for their households unaffordable • 87 per cent of respondents had no idea about policies relating to Primary Healthcare Units (PHU) and drug availability <p>These are all areas that the ACC could be expected to investigate, bring public and government attention to, and collaborate with ministries in prevention activities. However, the ACC seems not to have engaged with service providers to create more openness and transparency in delivery as a prerequisite to accountability and reduction in illegal charges</p>
<p><i>Surveys/studies relating to reducing private sector corruption</i></p>
<p>The WB's DBS described in Table 1. shows a fall in Sierra Leone's rating</p>

It was apparent to the consultants that there was little if any use of these surveys and studies to inform policy or strategy of the ACC.

Of particular concern is the SSR revalidation because this clearly shows that corruption is seen as a key threat to Sierra Leone's peace and stability by ordinary people. Interviews carried out with representatives from the media and civil society reported growing levels of dissatisfaction and anger among the public with levels of corruption and perceived lack of progress in dealing with it³.

The ACC has not carried out or commissioned any baseline surveys of corruption occurrence and perceptions since the 2004 Campaign for Good Governance Corruption Perception Survey. This is a serious failure, and is likely to be due to the fact that the focus of the ACC during the period under review has been largely inward (see below) relating to administrative matters. Experience internationally has shown

³ This view is supported in a recent publication of the CGG *Governance Review*, pp. 9. and p. 14.

the benefit of providing objective data on corruption: it depoliticises a highly political debate by injecting a measure of objectivity and methodological rigour⁴.

There also seems to have been little or no engagement with the private sector or other relevant government reform programmes relating to the ACC's project goal and its four OVIs. A leading private sector informant reported that corruption is such a serious impediment to business that 23 of the 35 members of a business association have moved their businesses to Egypt, Guinea, or Liberia since 2004. The World Bank's worldwide governance indicators show that Sierra Leone ranks well below the regional average for such indicators as government effectiveness and regulatory burden. Sierra Leone is also significantly worse off in both the rule of law and control of corruption than the regional average and that is particularly the case for the rule of law.

Achievements relating to the Project Purpose:

Introductory comments – The Purpose defined in the memorandum is “GOSL assisted in implementing anti-corruption strategy through creation and expansion of an effective ACC”. This refers to organisational issues and capacity building of the ACC, and its ability to fulfil its role as the lead body in the fight against corruption in Sierra Leone.

There is cause for deep concern over changes occurring at the ACC during the review period. The ACC has suffered greatly under a combination of its difficult operational context together with internal leadership issues which seem to be impacting negatively on organisational capacity.

On different occasions members of staff informed the review team of what they saw as the difficult working conditions at the ACC which were impacting on their morale. This was borne out by the review team's own observations of the management style. Indications of serious lapses in management identified by an audit are detailed further below.

A key indicator is the cessation of fortnightly Tasking and Coordination Meetings (TCM) started under the previous Commissioner. These had the aim of bringing together all ACC departments in order to develop a unified AC strategy, looking at the themes and patterns of complaints, defining what should be investigated, how it should be done, what aspects Prevention/CR could take up, sharing knowledge, and monitoring performance. Instead, these meetings have been replaced by monthly Management Meetings and daily mini-management meetings. The review team was told that monthly management meetings do not focus on the task-oriented aspects that had been covered by TCMs. Instead, the focus is almost wholly internal relating to minor administrative issues such as expense and fuel payments (Management Meeting Minutes May 2006 to October 2006). The team was also informed that there are no agendas or minutes for the mini-management meetings.

The Commissioner disclaimed knowledge of the DFID Project Memorandum to the review team and the DFID Governance Advisor despite the fact that the Project Memorandum is the document in which the ACC and DFID define their mutual accountability and despite information from DFID that it has been provided to the Commissioner on several occasions.

⁴ Cf. Daniel Kaufman, 2006

The Commissioner's contributions to the 2005 ACC Annual Report are not aimed at increasing public confidence in the organisation that he leads. Amongst other things the commissioner's foreword makes it a matter of public record that he 'can hardly vouch for the accuracy'⁵ of the report produced by the ACC.

The inward focus of the ACC has led to a reduction in travel of the Investigation Team outside Freetown (minutes of Management Meeting, 9 Aug 06) and witnesses for domestic cases are expected to travel to Freetown at their own expense.

There has been a significant under-spend of DFID funds during the programme under review, and specifically since end of 2005. According to information provided by DFID there was a considerable underspend of over £750,000 at the time of the review. It will be difficult to spend this money on effective, targeted anti-corruption activities in the three months remaining for DFID support. This degree of under-utilisation of funds suggests that work relevant to the achievement of the operational plan in investigations, preventions and community relations is not being carried out.

The review team is of the view that the management style of the current leadership of the ACC does not create a dynamic, results-oriented organisational culture that could enable the ACC to make headway in its difficult operational context.

Output 1: Progress on Community Mobilisation

No clear evidence of community mobilisation.

The Community Relations (CR) section of the Prevention and CR Department has been active during the review year. During Phase I of the project and up to 2005, 17 Integrity Clubs were set up in schools throughout the country with the aim of instilling a culture of integrity in pupils, reaching parents and the wider community with AC messages, and ensuring fair and free public examinations. During 2006, GTZ funded ACC activities to set up six more Integrity Clubs in Port Loko, Moyamba, and Kono. However, information on whether public examinations were free and fair was not available to the team, and was not evident in any of the PCD Department's reports.

GTZ also funds the ACC to work with local radio stations to educate the populace in the fight against corruption through radio discussion programmes and airing ACC jingles. During 2006 the number of radio station partners increased by 12 to 15.

However, while these efforts are laudable, monitoring and assessment has been in terms of the volume of activities, whether jingle and programmes have been aired, or clubs formed and **there has been no real impact assessment of these activities in terms of whether and how they have changed people's behaviour.**

It would be useful for the CRD to rethink its strategy away from indefinite expansion of outreach activities⁶ aimed at changing public perceptions of corruption towards building the capacity of partners to implement such activities by providing materials and technical support. It should also be noted that continued lack of progress in prosecution impacts negatively on public reception of the ACCs community education and readiness to report corruption.

⁵ Anti-Corruption Commission Annual Report 2005, *Fighting Corruption: A National Concern*, p.3.

⁶ Cf. Anti Corruption Commission Community Relations Department. Achievements since 2000. Internal ACC document.

There is no data on the level of reporting of corruption. Analysis of the incidence of civil society and media reports of corruption in 2006 and for comparison with 2005 was not possible for the review team to do in the short time in-country. There were no statistics seen by the consultants on the number of people reached by the CR activities.

Community organisations are participating in the review of the NACS. In addition, at least one workshop has been held with religious groups to tie the AC agenda to moral precepts in Christianity and Islam. However, this is a process indicator rather than an output one. The key issue (also raised above relating to Integrity Clubs and Radio jingles) is whether such participation is actually mobilising people. For example, it could be expected that effective workshops would mobilise the public at local level around better transparency at elected council level, and lobbying for transparency within Chieftom administrations (both relating to transparency clauses in the Local Government Act 2004). In addition the indicator specifically notes 'all levels of society' – there has been little attempt to engage university students or elite private sector bodies such as the Chamber of Commerce, Manufacturing, Accountancy or other professional associations in the fight on corruption, for example relating to improving Sierra Leone's ranking in international surveys of the business environment.

There is no clear evidence that the public are willing to blow the whistle on corruption. According to the Head of Prevention and CR at the ACC numbers of complaints are dropping but comparative figures over two to three years were not available to the team. If true, this is a hard fact to interpret. Falling complaints were cited as an indication of reduction in corruption whereas this could indicate that the willingness to whistle blow is declining, or that the public is not blowing the whistle to the ACC but informing elsewhere (going to the media for example).

Output 2: Progress on Prevention

Limited achievement

Recent prevention activities centred on an internal review of the National Anti-Corruption Strategy (NACS), which has involved appointing a Technical Working Group (TWG) to develop an implementation strategy for the NACS.

This has happened a bare three months before the target date laid down in the April 2006 benchmarks for the agreement of an implementation plan for NACS. Despite the management of the TWG being output-led and time-bound, it will be unable to achieve the target date of the end of 2006 for finalisation of an implementation strategy. This is not through any fault of the TWG which was given a very tight timeframe to complete its work given that it was only convened a year and a half after the development of the NACS.

It is also of concern that there is no baseline survey of how the NACS is currently doing as a basis or justification for review. Carrying out relevant surveys as the basis for AC strategy generally and for the ACC is a specified activity within the project memorandum.

The strategy for prevention has changed since the reinstatement of the present Director for Prevention and Community Relations, and has taken a very different form from the previous approach whereby 'integrity officers' were appointed in ministries. This shift in the approach has meant a slowing down in prevention activities.

It was reported by civil society and key governance stakeholders that collaboration with the ACC on prevention activities had reduced during the period under review, contrary to the recommendations of the 2005 Annual Review that increased collaboration and outreach take place.

The Prevention/CR Department also does not seem to have engaged with wider relevant programmes of Public Sector Reform, Public Financial Management Reform, or Justice Sector Development. Attempts by the former Commissioner to set up an Inter-Agency Forum to improve communications have not been taken forward.

The number of prevention strategies in place in ministries is the stated MOV for this output. Evidence from ongoing Management and Function Reviews of ministries suggests that there are no defined anti-corruption strategies by MDAs (source GRS). Instead, most corruption prevention achievements in Ministries seem to be the result of wider reform programmes or Ministry/Agency-specific reforms such as the Cadastral system within Ministry of Mineral Resources or the Direct Drug Delivery System in the Ministry of Health. As for investigations, the Prevention/CR Department seems to be operating without a clear policy on the issue of prevention. It is not clear why the interventions which are implemented are chosen over other possible measures, nor what they are aimed at achieving.

Further, prevention appears limited to the functioning of government departments or sectors such as education and the other “hot spot” ministries. This leaves aside the question of corruption in other sectors beyond government or indeed the question of networks between the public and private sectors. There is no evidence of approaches for example to the private sector in order to address some of the larger forces that may be at play. It would be within the ACC’s mandate to address those broader systemic aspects through the work of the prevention department.

Apart from awareness raising and outreach efforts, there seems to have been no consideration of ‘harder’ or more practical approaches to prevention such as integrity testing or vetting processes for key public servants, police, customs, mines and fishery officials in any of the Prevention and CR Department’s strategies or documents which were available for review. There has been no policy position prepared by the ACC on prevention aspects relating to the proposed Senior Executive Service or to staff of the local governments. This reveals a lack of research and policy analysis within the ACC, as there is an abundance of accessible material from specialist web-based resources analysing the effectiveness of such interventions and providing a variety of on-line tools and links⁷.

Output 3 Investigations carried out regularly and promptly. Results made public. Low numbers and generally low profile of prosecutions. Improvement in case investigation times from 2005, but 70 per cent of cases still taking too long to investigate. Results of investigations not made public.

No policy has been developed to help investigation staff prioritise cases. In the absence of a policy framework and effective oversight, decisions made on cases are prone to charges of lack of accountability and transparency⁸.

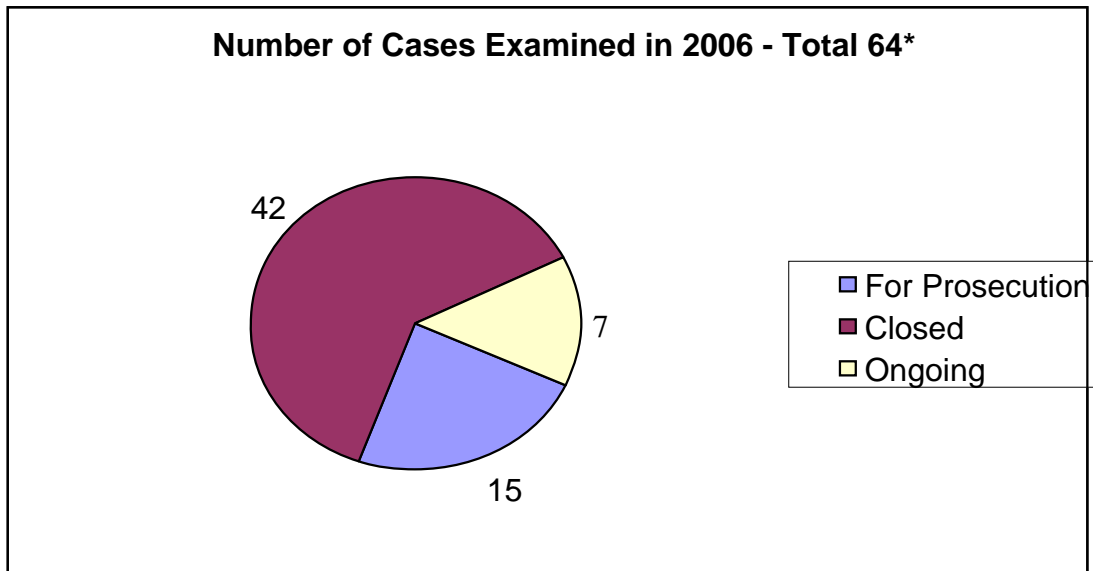
⁷ See for example, www.gsdr.org, www.u4.no.

⁸ For example, in 2006, 17 out of 26 cases were closed. Closure is justified on grounds of either insufficient evidence to support initial allegations or clear indication that allegations do not amount to a case under the ACA. However, the ACC is not directly accountable to anyone outside the organisation for such decisions. This can be compared to the practice in the Independent Commission Against Corruption (ICAC), Hong Kong where an investigation, once begun, can only be closed before

Cases Examined in 2006

Preliminary figures for 2006 provided by the Investigations Department show that 64 cases were examined, of which 15 (23 per cent) have been forwarded to the AG for prosecution, 42 (66 per cent) have been closed, and seven (11 per cent) are ongoing.

Graph 1:



* Includes 38 'backlog' cases outstanding from 2002-2005 and 26 cases initiated in 2006.

Numbers of Prosecutions in 2006:

In 2006, there were **seven** successful anti-corruption prosecutions, comprising **nine public officials** (see table 3), of which **two** originated from investigations initiated in 2006, and the remaining five relate to ongoing cases already arraigned (and not part of the 2002-2005 backlog).

30 per cent of cases were completed in a timely manner but the average length of investigation of a case is **146 days**, or more than one and a half times the target length (90 days per case). Backdated cases from 2002-2005 typically take hundreds of days with the longest still awaiting decision being **1068** days.

Type of Cases

The Project Memorandum, the ACC benchmarks agreed between the GOSL and DFID, and the IGAP agreement all specifically identify progress in prosecuting and convicting 'high level' or 'significant public interest' cases as key indicators for AC efforts and a measure of the effectiveness of the ACC.

In fact, the ACC does not categorise cases in terms of level. The reason for this is unclear given the written emphasis given to high level corruption by the GOSL and

prosecution by the Operations Review Committee, a citizen oversight board chaired by a private citizen, one of four such committees, cf. Meagher 2005, p. 90

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the ACC's donor partners, but could be related to the lack of policy making and strategy⁹.

However, for the purposes of this review, cases have been classified as 'high' 'mid' or 'low' level according to the status and position of the individuals and according to the severity of the charges.

Between October 2005 and December 2006, there were 12 convictions as follows:

Table 3: Convictions October 2005 to December 2006

Public Body	Offence	Date	Conviction	Level of Case
Head Master, Ahmadiyya Primary School, Moyamba District	Misappropriation of Public Funds (MPF)	10.11.05	Cautioned and discharged. Refund of Le 795 596	Mid-level Note small sum of money involved
Accounts Officer, Sierra Leone Library Board	MPF	17.11.05	2 years imprisonment Refund Le 3 million	Low-level
Paying Officer, Kissy Mental Hospital	MPF	01.12.05	Suspended imprisonment 3 years Refund of Le 525 700	Low-level
Magistrate, Judicial Department	4 charges of Soliciting an Advantage	19.01.06	3 years imprisonment each Refund of Le 125 000	Mid-level Note small sum of money involved
Caterer, Kissy Mental Hospital	MPF	06.03.06	6 months imprisonment Refund of Le 853,000.00	Low-level
Principal Officer, Laura Dove Vocational Institute	MPF Le 8 193 921	30.03.06	3 years imprisonment	Low-level No refund in this case
Senior Accounting Assistant Milton Margai College, Freetown	MPF	14.06.06	2 years imprisonment Refund Le 4,598,468	Low-level
Assistant Immigration Officer Kailahun District	MPF Corrupting a Public Officer	29.06.06	Le 500,000 Fine & 6 months imprisonment if in default (Imm Officer) Le 300,000 Fine & 6 months imp if in default (other party)	Low-level
Police Constable Kailahun Police Station	MPF	29.06.06	Le 500,000 Fine & 6 months imp if in default	Low-level
Senior District Officer	2 counts of Soliciting an Advantage	30.08.06	3 months imprisonment	Mid-level
Senior District Officer	1 count of Soliciting an	30.08.06	3 months imprisonment	Mid-level

⁹ Some ACCs such as the Hong Kong ICAC use a "broken window" approach which obliges them to pursue every case of corruption regardless of its monetary or political significance, others such as the New South Wales commission are very selective in their approach to prosecution; but there is no evidence of a specific policy directing the decisions of the SLACC.

	Advantage 1 count of Accepting an Advantage			
Project Co-ordinator	2 counts of MPF Le1,450,000.00	16.11.06	2 years imprisonment suspended sentence Refund of Le 1,450,000 to donor Fine of Le 500,000 on each count	Mid-level

According to this analysis, seven of the convictions in 2006 were 'low-level' cases, five 'mid-level', and there have been **no 'high-level' convictions** for this period.

Questionable cost-effectiveness and deterrent impact

It is also apparent that (with the possible exception of the project fraud) convictions of medium level corruption are often minor in terms of the sums of money involved. This raises the question of the **cost effectiveness of the ACC**, and specifically for this review the value for money in terms of DFID's (and ultimately the UK taxpayer's) support. For example, the time spent in achieving convictions in the linked (low level) cases of the immigration and police officers in Kailahun was two years, as was the time for conviction of the project fraud (these cases were brought to the ACC in 2004). A cost-effectiveness analysis of investigations was beyond the remit of the review team, and not possible in the 10 day consultancy period. In addition, the issue of **recovery of criminal gains** from corrupt practice has not been analysed by the ACC or a policy/strategy developed. However, it is apparent that significant resources are being spent on low level and medium level cases of corruption, often entailing relatively minor sums of money.

Deterring other likely offenders is an aim of focussing on prosecutions. However, there is no information which could allow conclusions to be reached on the deterrent effects of the penalties imposed for those cases which went to conviction. In general it can be assumed that the prosecutions undertaken on cases forwarded by the ACC to date can have little if any deterrent effect, since punishment is neither swift nor sure, particularly for high level offences.

Output 4 Perceptions on corruption measured and changes analysed

Not achieved – red surveys. Limited achievement relating to NACS – developed in 2005 but not implemented. The NACS is being revised and an implementation plan developed, but without baseline data.

This is one of the critical failings of the ACC during 2006. The inward organisational focus, the lack of alliances with other pillars of governance, and the significant under-spend of the budget this year (implying inactivity in fighting corruption) make it unlikely that there will be any progress during 2007 in this essential area. For anti-corruption programmes to work, they must identify and tackle the country-specific causes of governance failures, rather than applying "one size fits all" measures. This omission will impact on other activities of the ACC, as they will be undertaken in the absence of objective knowledge obtained from surveys unless this information is available from independent surveys and also applied. While CSOs are producing such knowledge, it should be noted that they are usually unlikely to have the resources to implement surveys with the necessary coverage.

ASSESSMENT OF IMPLEMENTATION OF RECOMMENDATIONS OF THE 2005 ANNUAL REVIEW

There has been little real progress since the 2005 review. In fact some of the positive achievements outlined in the review have been negated or reversed. These included progress in Strategic Planning (now non-existent) and cancellation of fortnightly Tasking and Coordination (TCM) meetings (see comments above). Table 3 gives a snap-shot of progress in implementation of recommendations from the 2005 review, followed by a more detailed narrative assessment of progress on some of the AR 2005 recommendations.

Five of the recommendations have been partly achieved, three not achieved. However, of the partially achieved recommendations, two are questionable in terms of the quality of the activity (reform of the Act, monthly press/media conferences), one (mentoring/staff development) is unsustainable, and one (decentralisation) combines progress and regression.

Table 4: Synopsis of Progress in Implementation of 2005 AR Recommendations

Recommendation	Implementation progress	Comments
1. Build on and improve relations and linkages with Government, Parliament, civil society, the media, and donors	No progress	The ACC under its current leadership is inwardly focussed. There have been no attempts to assist the Auditor General to lobby for rescinding Standing Order 75 (which prevents publication of Audit reports) or to gain allies in applying pressure to the Attorney General for faster case processing. The ACC remains wedded to DFID funding, with some GTZ contribution in Community activities, but no interest from other major donors, apart from the EU where there is a tentative offer of support to an infrastructure project for the Makeni office and Kenema.
2. Further decentralisation and linkages at the local level specifically by opening of Makeni and Kenema Offices	Some progress	There are ongoing negotiations over opening of the Makeni office No plans to open Kenema office. The Bo office has had its budget centralised to Freetown, meaning that the officer has to travel to the capital for authority to sign cheques/make payments
3. Consolidate training and staff development through 'mentoring' and learning from other African ACCs	Some progress in Investigations Department. Nairobi anti-corruption conference attended	Mentoring by the external Investigations Adviser has had effect on staff' investigation and management skills, but is regarded as probably unsustainable by the Adviser, as no processes are kept up when he is absent Commissioner and prevention staff attended conference but no evidence of sharing lessons learnt with staff
4. Improve public relations and communications by improving internal capacity, developing a communications strategy and enforcing guidelines	Limited progress – press conferences held regularly but no communications strategy	Press conferences mainly give reasons why prosecutions/activities cannot take place. The management of press conferences is sometimes counterproductive

5. Accelerate the linkages between the National Anticorruption Strategy (NACS) and other governance reforms such as Management and Function Reviews and ensure high level 'buy-in' from ministries	No progress	The ACC has not played a proactive role in promoting linkages to other governance agencies and reform in the period under review.
6. Greater focus on prevention and 'point of service' corruption in addition to focussing on high-level corruption	Partial progress.	Number of cases brought for prosecution is low even for low-level cases involving 100 – 500 thousand Leones (£20 - £100). There is no recognition at the political level that administrative sanctions might apply as alternative to legal prosecution particularly for high level corruption.
7. Legal reform – facilitate a consultative process on revision of the AC Act and need for full-time in house legal advice	Limited progress. Task force on law revision has met three times. Full-time legal adviser appointed	There is a lack of strategic direction in amending the Act. In its current form the process could take months
8. Capacity building of the Advisory Committee (AC)	Limited progress	Some training has been provided to the Advisory Committee. However, the AC does not play an active, influential role in the affairs of the ACC and is absent from the updated strategic plan. <i>The review team was unable to meet the Advisory Committee on this visit.</i>

Detailed Comments:

Recommendation 1: Build-on and improve relations and linkages with government, parliament, civil society, media and donors:

Anti corruption commissions depend on effective cross-agency cooperation. The NACS and other documents underline that the ACC cannot fight corruption on its own and must seek partners and build coalitions to effectively implement its mandate. In fact, proactive leadership by ACCs to forge an effective array of strong linkages to other oversight bodies and the public can help to counteract weaknesses in other areas¹⁰. However, the overwhelming majority of informers from the different sectors spoke of a drastic reduction in or disappearance of interactions with the ACC from the end of 2005. Particularly at the strategic level, the ACC is absent as a significant player in the field.

Despite the slow progress on prosecutions, there was only one meeting between the present Commissioner and the office of the Attorney General. The ACC discontinued these meetings after DFID declined to continue attending them. This bespeaks a lack of understanding of the importance of domestic ownership and promotion of the anti-corruption reform agenda.

The Office of the Auditor General could be a key ally for the ACC in attempts to uncover and reduce official misappropriation of funds. Ideally, the two institutions should cooperate and work to strengthen each other. Instead a disagreement around

¹⁰ cf. Meagher 2004, p. 93

procedures for auditing of the ACC's accounts has been allowed to grow, with contentious correspondence between the ACC and the OAG being published in the 2005 ACC Annual Report. The ACC's financial statement remains unaudited by the OAG, a problematic situation for an anti-corruption watchdog, regardless of the cause¹¹.

The ACC has not used its influence to lobby for a change in parliamentary Standing Order 75, to allow expeditious publication of the OAG's annual reports, which the GoSL has agreed to as a benchmark¹². Little public advocacy to raise awareness has been done around the issue of SO75 either by the ACC, the OAG or indeed by civil society. Most CSOs interviewed seemed unaware of this issue, which has serious implications for executive accountability, legislative oversight and public access to information on how public resources are spent.

Relations with Parliament reached a low ebb with Parliament conducting inquiries into the ACC on two occasions last year but there is little evidence of efforts on the part of the ACC to repair relations and influence this body. The existence in Parliament of a chapter of the African Parliamentarians Network against Corruption (APNAC), although embryonic, would appear to offer a modest foothold for such attempts¹³.

Linkages with civil society have been largely sporadic and unsustainable over this year. While some CSOs we spoke to underline the symbolic importance of the ACC as a deterrent, only a few could point to concrete interaction with the Prevention and Community Relations Department in the field. The NAG is a member of the task force for reform of the ACA2000. It was reported by CSOs interviewed that the ACC at times seemed to have an exclusionary relationship to CSOs in outreach activities and that its cooperation with CSOs tended to limit them to a role as sub-contractors on discrete anti-corruption activities, rather than full partners.

There has also been no engagement with the private sector. In general, not enough effort appears to have been invested in cultivating the private sector as a partner in anti-corruption. Private sector informants viewed the ACC as largely irrelevant even though, by their own testimony, they are subject to heavy demands for facilitation or illegal payments. A leading private sector association representative reported that corruption is such a serious impediment to business that 23 of its 35 members have moved their manufacturing bases to Egypt, Guinea, or Liberia since 2004. While corruption is common in these countries, the World Bank's worldwide governance indicators show that Sierra Leone ranks well below the regional average for such indicators as government effectiveness and regulatory burden. Sierra Leone is also significantly worse off in both the rule of law and control of corruption than the regional average and that is particularly the case for the rule of law¹⁴.

Recommendation 4. Improve public relations and communications by improving internal capacity, developing a communications strategy and enforcing its guidelines: While monthly press conferences were held, the manner in which they are conducted appears to have been counterproductive, focussing largely on allegations by the

¹¹ Anti Corruption Commission. Annual Report 2005, pp. 29-35.

¹² s. Appendix IGAP benchmarks.

¹³ The Chairman of the SL chapter of APNAC is the Hon. Ibrahim Bundu.

¹⁴ "Governance Matters IV" Kaufman, Kraay and Mastruzzi. World Bank WPS 3630, June 2005. Government effectiveness measures the competence of the bureaucracy and the quality of public service delivery. Regulatory burden measures the incidence of market-unfriendly policies.

Commissioner of corruption within the ACC or on why prosecutions were not proceeding.

Recommendation 6. Greater focus on prevention and “point of service corruption. Focus continued on the need for progress on significant public interest cases. The ACC does not have the capacity to manage a broad-based approach to anti-corruption, such as greater accountability for service delivery. With lack of progress on high-level cases, a turn to focus on point of service corruption runs the risk of being seen to victimize the “small fry”, after lack of success in catching some “big fish”. In addition, point of service corruption is more effectively dealt with by the more comprehensive reform efforts elsewhere such as improved financial management, better records management, reduction of regulatory burden etc. Under this rubric, measures should be adopted which are as simple and cost effective as possible such as mandatory wearing of name tags for public officials who come into frequent contact with the public, free availability of official forms, posting of information in public offices of procedures, charges etc.

Recommendation 7 Legal Reform This has been on the agenda since at least October 2003 when the SL Governance and Anti-Corruption strategy (GAC) set a time frame of three months for the review and strengthening of the ACA 2000 to empower the ACC to prosecute its own cases without reference to the AGs office. There is now a benchmark under IGAP that the necessary changes to the ACA 2000 be agreed by end 2006. However, in our view, while amendments are necessary for compliance with the African Union anti-corruption convention, the United Nations Convention Against Corruption, and the regional ECOWAS protocol, the problem lies not so much in the shortcomings of the law as in the lack of enforcement. The limits of the existing law have by no means been exhausted; for example a brief survey of the Act shows that there is indeed scope to address corruption beyond the public sector (cf. Section 15, ACA 2000). In addition, the dilatory management of the task force meetings gives cause for concern as to whether a new draft law can soon be expected for presentation to Parliament, which is in any case now preoccupied with the pre-election period. Arguably, the ACC should have long been in a position to produce or commission an analysis of the law detailing shortcomings and desirable amendments. Instead meetings are being held without an agenda and no written positions were available either from CSOs or the commission on desired changes making real, rapid progress unlikely.

Recommendation 8: Build capacity of Advisory Committee

Due to the very late collaboration by the ACC with the review team, it was not possible to meet members of the Advisory Committee. However, there have been few activities relating to this recommendation. The AC is clearly not a strong, active body with influence in the ACC. The updated strategic plan 2006-2007 of the ACC contained no reference to the AC. The ACC is not subject to any direct oversight on an ongoing basis. Nor is the Commissioner directly accountable at the operational level in the exercise of his mandate or to management appraisal of his performance. The Commissioner is accountable to the President who appoints him. In the view of the review team, the Anti-Corruption Act should be amended to supply effective operational oversight to the ACC by a substantive Board which would include representatives of civil society organisations such as the Law Society, NGOs and private sector bodies. Consideration could also be given to creating more advisory committees within the ACC to increase its public accountability and ownership.

PROGRESS AGAINST THE 2006 RESULTS FRAMEWORK

A striking aspect of attempts to address corruption and governance in Sierra Leone is the proliferation of benchmarks relating to performance on various aspects of governance and anti-corruption reforms. Apart from allowing the partners to periodically reconfirm clear points of reference for continuing dialogue this does raise the issue of flagging political will and a need for greater ownership of reform on the part of GoSL. Over and above the benchmarks already laid down in the Project Memorandum, high level discussions were held in April 2006 between the British government and GoSL on the need for Sierra Leone to demonstrate concrete results in combating corruption. A set of benchmarks were agreed with the ACC.

It was hoped that these benchmarks would provide a framework for the strategic direction of the ACC over the coming year and foster a greater ownership on the part of the new Commissioner over the activities of the ACC, focussing on achievable and measurable results. The benchmarks also provided DFID with a baseline against which to monitor progress. The following table lists achievements against the 2006 ACC benchmarks.

Table 5: Achievements against Benchmarks in the 2006 Results Framework

Framework	Progress
<p>Strategy</p> <ul style="list-style-type: none"> • Fully costed ACC operational strategy (with benchmarks) developed and agreed by end April (to be monitored quarterly) • Develop and agree revised NACS implementation plan by end June 2006 (plan to be monitored quarterly) 	<p>Achieved</p> <p>Not achieved by target date: There is movement on the revision of the NACS. A Technical Working Group has been established to carry out the review, and has started working recently, with objectives and a timeframe. However, there has been no baseline survey carried out to inform the revision.</p>
<p>Investigations</p> <p>Case backlog reduced and investigations efficiently progressed:</p> <ul style="list-style-type: none"> • Complete outstanding cases 2002-2005 by end June 2006 • Significant public interest cases forwarded to AG for prosecution (to be monitored quarterly-1st review end April) 	<p>Achieved: Committed effort from the Investigations Department and the Investigations Adviser has been instrumental in achieving this result.</p> <p>Limited Achievement: Only two (2) cases of the seven for prosecution referred to the Attorney General in 2006 are high profile. These are still awaiting processing by the AG. Two 'low level' and one 'mid-level' case have been processed and are awaiting trial.</p>
<p>Communications</p> <ul style="list-style-type: none"> • Monthly briefing meetings with the media to update on ACC activities and progress on cases (to be started April 2006) 	<p>Limited Achievement: Meetings are held, but according to media informants the content communicated related more to why the ACC is <u>not</u> investigating and preparing cases for prosecution, rather than on progress on cases by the ACC.</p>

<ul style="list-style-type: none"> Monthly meetings with AG and DFID to discuss ACC cases (to be started April 2006) 	<p>Not achieved (discontinued): Following one initial meeting with all three parties in April 2006, the Commissioner subsequently refused to continue without the presence of DFID.</p>
<p>Legislative Framework</p> <ul style="list-style-type: none"> Establishment of Law Reform Task Force led by ACC for review and amendment of Anti-Corruption Act (2000) (Task Force set-up by end May 2006. Changes to ACC Act (2000) agreed by end December 2006). 	<p>Slow progress: Although the task force was established 'on paper' in July 2006, it had only met three times by early December and it is unlikely that changes will be agreed by end 2006.</p>
<p>Monitoring</p> <ul style="list-style-type: none"> Agreed monitoring/ review mechanism in place by mid-April (including GOSL/ACC/DFID) 	<p>Not achieved in the agreed timeframe: More collaborative and outwardly focussed leadership would be able to utilise existing review mechanisms and report to GOSL.</p> <p>Pricewaterhouse Cooper (Ghana) carried out an audit of the ACC in October 2006</p>

The latest in the series of benchmarks agreed between GoSL and its partners is the Improved Governance and Accountability Pact (IGAP), dated 18 July 2006. IGAP is an agreement between GoSL and four development partners providing direct budget support - the African Development Bank, the Department for International Development, the European Commission and the World Bank - to "take forward ten critical governance and accountability reforms over the coming year until July 2007". The partners place their commitments "in the public domain in order to foster awareness among civil society and encourage more engagement on key governance and accountability issues"¹⁵. This is laudable but more should be done to publicise them since they did not form part of any of the discussions with civil society, the private sector or the media.

A thorough evaluation of the IGAP targets would be beyond the terms of reference of this review, but an assessment of the attainability of some of the agreed actions, particularly as they directly relate to the work of the ACC, is appropriate. However, none of the agreed actions under Priority Reform 1 on Anti-Corruption are on track for achievement by the target date, despite the fact that several have been the subject of different benchmarks and agreements. The development of the implementation strategy of NACS only started in November 2006; a year and a half after the NACS was published, in March 2005. The implementation plan for NACS will not be agreed by the end of 2006. The responsible working group is presently setting itself a timeframe which reaches well into 2007.

The agreement sets a deadline for changes to the Anti-Corruption Act in conformity with the African Union (AU) and UN anti-corruption conventions to be agreed to by the task force set up for this purpose by the end of 2006. Despite the fact that UK-GoSL benchmarks also contain this mutually agreed action, it is not on track for achievement, as outlined above. Discussions relating to the target of embedding the

¹⁵ See "Joint Communiqué. Improved Governance and Accountability Pact (IGAP). For Poverty Reduction and Sustainable Development in Sierra Leone. 18 July 2006".

ACC fiat into law and relating to the declarations of assets of public servants have not progressed.

IGAP calls for an increase in the number of 'significant public interest' anti-corruption cases forwarded by the Attorney General for prosecution and for the ACC to update the public on activities through monthly press briefings. "Significant public interest" is defined in the communiqué as "cases involving senior public servants (i.e. not low-level corruption)". This is the latest in a long line of attempts to push for progress on this vexed issue.

The question may legitimately be raised why agreements keep being signed which appear to be honoured more in the breach, and why donors keep on pressing for progress which remains stubbornly elusive. This appears to run the risk of making a mockery of the government's and donors' declared commitment to the goals of poverty reduction and sustainable development which guide the agreements.

REVIEW OF 2006 DFID AUDIT FINDINGS

The October 2006 Draft of the Audit carried out by PriceWaterhouse Coopers (Ghana) of the DFID Imprest Account implemented by the ACC for the 29 month period to 31st August 2006 was made available to the consultants, together with the Management Comments from the ACC.

The Draft Audit report found 32 key issues, of which 22 had a high implementation priority, 8 a medium priority and only 2 a low priority. Six of the issues (five of high priority and one medium priority) related to DFID communication of information and lack of training on IMPREST. DFID has prepared its response on these issues, to be included in the final Audit report.

The remaining 26 relate to the ACC, of which 17 are high priority, seven medium and two low. This would seem to indicate an organisation with serious management problems.

The Audit was of the opinion that the lack of an MOU between DFID Sierra Leone and the GOSL for the implementation of the programme was a contributing factor to different understandings by the ACC and DFID on the management of funds. Three meetings were held by the review team with the Commissioner and his staff, the first being an introduction to the review and the team, the second a substantive meeting held at the end of the review period after high-level interventions to gain the Commissioner's cooperation, and the final meeting on Tuesday 5th December being a statement by the Commissioner to the consultant remaining in Freetown on his tenure in the post. At each meeting, the lack of control of the Imprest Account by the Commissioner was a major grievance.

The auditors noted that application of DFID's procurement rules in the management of DFID funds are consistent with the Procurement Act 2004, but need to be spelled out in an MOU to avoid conflict and confusion. They also made a number of recommendations to DFID relating to communication of rules and procedures, budget sums, and report requirements and deadlines to the ACC. Capacity building in project financial management, imprest account management and setting up organisational structures was also recommended.

Arguably, it is the responsibility of new leadership to be proactive in initiating communication with the donor, finding out what conditions and procedures apply to donor funds, and clarifying what the project framework is and what stage of progress the organisation has achieved at the time of taking office, together with communicating his or her own vision of how the fight against corruption can be waged and won.

More substantive recommendations are made to the ACC. These include five points critical to the effectiveness of the ACC:

- Update of organisational structure and strengthening of internal controls. The consultants found that the structure proposed under the old Commissioner was rejected by the new incumbent, but no alternative proposed. An updated structure has therefore been lacking for twelve months since November 2005.
- Formulation of a fraud policy and fraud response plan to adequately detail detection, prevention, deterrence and punishment of fraud. This is a serious omission given that the ACC should be the best practice model of anticorruption within Sierra Leone.
- Ensure adequate staffing, especially filling the position of Deputy Commissioner. There have been no moves to address the urgent priority of finding a Deputy Commissioner since the resignation of the previous post holder. The Auditors note that the Commissioner handles both policy and administrative issues, which is an inadequate segregation of duties and does not facilitate effective review and supervision processes.
- Provide semi-annual progress reports to DFID. The Auditors note that besides being a project funding requirement from DFID, these are good decision making tools which would benefit the management of the ACC.

In addition, as pointed out above, although this aspect is not touched on in the PWC audit, the failure to have the Commission's accounts audited by the Office of the Auditor General, as required by the ACA 2000, at the very least as concerns monies received from the Consolidated Fund, is a major failure in public accountability on the part of the ACC. In the interests of mutual accountability and transparency, all funds received by the ACC should be subject to such an audit..

ISSUES RAISED IN THE UPDATED OPERATIONAL FRAMEWORK 2005-2008

In assessing the financial position of the ACC, it would have been important to receive information on the current position pertaining to issues raised in the Operational Framework as updated in April 2006 by the then Deputy Commissioner.

By November 2006, four months prior to the end of the funding period, there did not appear to be concerted efforts being made to review and secure the need for future financial and technical support to the ACC beyond March 2007. As mentioned above, there is a significant level of underspending; discussions are yet to be initiated on how these funds could be allocated and spent. The ACC finance manager pointed to the difficulty of effective financial planning in the absence of timely information from DFID on the expenditure of DFID funds and recommendations were made in the audit on improving the flow of information to the ACC. The following specific issues were identified in April 2006 as requiring attention by the Commission with regard to financial sustainability in 2006 and beyond:

The ACC receives good levels of support from the GOSL in respect of salary costs. However the payments made in 2003, 2004 and 2005 for salaries have only just

matched the growth of the ACC and did not follow the suggested annual growth percentages agreed with the Ministry of Finance and based on the Organisational and Staffing Review of 2003.

Recurring cost contributions by GOSL are relatively modest but during 2003 -2005 have been supported by significant DFID contributions. GOSL recurring costs indicative budgets for 2006 and 2007 are insufficient at a time that the DFID funds are being reduced.

DFID financial and technical support is guaranteed until early 2007. This will need to be kept under careful review to determine what if any support will continue to be needed after this time.

CONCLUSION AND RECOMMENDATIONS

The difficult external environment the ACC operates in has not improved. Public confidence in the ACC's commitment to fight corruption is much reduced. Problems with the Attorney General's Office and the prosecutions side of the ACC's work remain, and have not been addressed by the 'fiat' system put in place in mid-2006.

The project memorandum emphasises the need for the ACC Phase 2 to draw on the considerable experience of anti-corruption work in other African countries, particularly in Botswana, Malawi and Zambia¹⁶. Unfortunately, rather than profiting from better practice experience, the ACC can be seen to be falling into some of the pitfalls experienced by African Anti-Corruption Commissions described by Doig, Watt, and Williams in their 2005 study of five such commissions¹⁷.

The primary question is whether the ACC in its present form can achieve the objectives which have been set out for it. It is also necessary to examine whether the objectives which have been set out for the Commission are appropriate in a post-conflict context. Without the functioning support institutions (in particular an incorrupt Judiciary, functioning Attorney General's Office, functioning and effective Auditor General's Office empowered to publish its reports regardless of Parliamentary debate, incorrupt police force, and strong independent media) the ACC cannot operate effectively.

In addition, the recent leadership and management of the organisation has undermined any progress that had been made with previous donor support. It is our view that during the period under review, the necessary leadership in building and leading an effective ACC within an already difficult environment has largely been absent. As a result, the ACC has deteriorated in terms of its effectiveness, capacity, and in the morale of its staff from the previous review period.

As pointed out in this review and in the previous Way Forward study (July 2006), more successes in dealing with corruption have been achieved through other more systemic interventions such as Public Financial Management reform, reform of records management in the civil service, to a lesser degree with public sector reform, ministry specific reforms such as the Cadastral system in the Ministry of Mineral Resources or Direct Drug Delivery scheme in the Ministry of Health, and some isolated instances in the private sector. Potential for the future includes initiatives

¹⁶ ACC Phase 2 Project Memorandum p. 20, section 3.5.1

¹⁷ Alan Doig, David Watt, Robert Williams; "Measuring 'success' in five African Anti-Corruption Commissions-the cases of Ghana, Malawi, Tanzania, Uganda and Zambia" May 2005

such as the EITI and civil society programmes which can build the demand side of governance, especially relating to capturing local government in its still early stages and promoting citizen accountability around transparency clauses in the Local Government Act 2004.

Key Recommendations:

We recommend that DFID ends support to the ACC Sierra Leone. There has been a history of repeated and intensive attempts to address the issues which have largely been unfruitful despite considerable investments of human and financial resources and time. UK development funds could be more productively spent on supporting more promising approaches to anti-corruption in Sierra Leone. **We consider that DFID should broaden and integrate its anti-corruption efforts into existing programmes, and develop alternative avenues for supporting anticorruption activities,** including:

- Considering how AC activities could be integrated into justice and security sector reform programmes;
- Considering introducing new prevention measures into civil service reforms, such as designing and implementing vetting procedures for key positions in the wider public sector as well as to security services;
- Continuing to support corruption preventive measures such as improved records management, payroll verification, improved public financial management and procurement reform;
- Increasing the focus on activities to increase citizens' demand for greater accountability, including through support to civil society and the media, and specifically in relation to local government (around transparency clauses in the 2004 Local Government Act) and developing open transparent systems in chiefdom governance through DFID's support to the decentralisation process and working with civil society;
- Supporting civil society to independently monitor the implementation of national anti-corruption programmes;
- Targeting the private sector, in particular removing obstacles to inward investment, and sharing best practice/achievements, including consideration of partnerships with professional, industrial, and commercial associations.

APPENDIX 1: DOCUMENTS CONSULTED

1. "10 Myths about Governance and Corruption", Daniel Kaufman, Finance & Development September 2005
2. ACC Report: Lessons Learnt, Felton A, DFID Sierra Leone
3. ACC Results Framework April 2006, ACC/DFID
4. ACC Strategic Plan 2003 – 2008, ACC Sierra Leone
5. ACC Strategic Plan 2006 – 2007 Comments by DFID, (correspondence), DFID Sierra Leone May 2006
6. "Anti-Corruption Agencies: Rhetoric or Reality?" Patrick Meagher, in The Journal of Policy Reform vol. 8, No. 1, 69 – 103, March 2005
7. Anti-Corruption Commission (ACC) Annual Report 2005, ACC Sierra Leone
8. "Anti-Corruption Commissions: Panacea or Real Medicine to Fight Corruption?", John R. Heilbrunn, World Bank Institute, 2004
9. Annual Review of DFID Support to the Anti-Corruption Commission Phase 2, Duncan, Hopper, Steele, Turay, 5 October 2005
10. "Combating Corruption: Look Before You Leap", Anwar Shah and Mark Shacter, Finance & Development, December 2004
11. Corruption Perceptions Index 2006, Transparency International
12. DFID Annual Review: Support to the ACC Sierra Leone, DFID Sierra Leone 2005
13. Doing Business Survey Country Pages (Sierra Leone) 2006, World Bank
14. Governance Matters V: Aggregate and Individual Governance Indicators 1996-2005, Kaufmann, Kraay, and Mastruzzi, 2006
15. Governance Review, Journal of Good Governance in Sierra Leone, Campaign for Good Governance, June 2006
16. IDA Resource Allocation Index (IRAI) 2006, World Bank
17. Improved Governance And Accountability Pact (IGAP) For Poverty Reduction and Sustainable Development in Sierra Leone, Joint Communiqué between African Development Bank, DFID, European Union, GOSL, and World Bank, July 2006
18. Information Note: ACC Benchmarks – Sierra Leone , DFID internal document, 3 May 2006
19. Letter of resignation from Deputy Commissioner to His Excellency the President, ACC internal documents, July 2006

20. Measuring 'success' in five African Anti-Corruption Commissions – the cases of Ghana, Malawi, Tanzania, Uganda and Zambia, Doig, Watt, and Williams, paper for the Utrecht 4, May 2005
21. Memos from Commissioner to Investigations Department 2006, ACC internal documents
22. Millennium Development Goals Report 2005, GOSL
23. Minutes of monthly Management Meetings April to December 2006, ACC internal documents
24. Preliminary Update on ACC Benchmarks and Progress in Caseload under new ACC Commissioner, DFID Sierra Leone (internal document) 2006
25. Project Memorandum: Sierra Leone Anti-Corruption Commission Programme 2004, DFID Sierra Leone
26. Report on the Global Corruption Barometer 2005, Transparency International
27. Report of the Public Expenditure Tracking Survey (PETS) for Financial Year 2004 Selected Expenditures, PETS Task Team Ministry of Finance, GOSL, 2006
28. Service Delivery and Perception Survey (SDPS) 2006, Centre for Economic and Social Policy Analysis, Sierra Leone
29. Sierra Leone Anti-Corruption Commission Phase II Programme Audit Review of the DFID-funded Imprest Account implemented by the ACC – Draft Report for the 29 month period to 31st August 2006, Pricewaterhouse Coopers (Ghana) Ltd, October 2006
30. Sierra Leone Drivers of Change Study, Brown, Gardener, Gberi, Fanthorpe, and Sesay, IDL 2005
31. Sources for Democratic Governance Indicators, UNDP Oslo Governance Centre, 2003
32. Summary of Investigation Department Work 2006, ACC Sierra Leone
33. The Way Forward on Anti-Corruption in Sierra Leone, de Davila, Kodi, and Otieno, Paper for DFID Sierra Leone 2006

APPENDIX 2
Improved Governance and Accountability Pact (IGAP)
Priority Reforms and Agreed Actions

Priority Reforms	Agreed Actions
<p>1. Anti-Corruption</p> <p><i>Commitment: To strengthen corruption prevention and accelerate prosecution of significant public interest anti-corruption cases. Agree on strategy to amend legislative framework to strengthen Anti-Corruption Act 2000.</i></p>	<ul style="list-style-type: none"> • Prevention – All anti-corruption stakeholders (Anti-Corruption Commission, Government and civil society) to agree on Implementation Plan for National Anti-Corruption Strategy by end 2006. • Prosecutions - Increase in number of ‘significant public interest’¹⁸ anti-corruption cases forwarded by Attorney-General for prosecution. ACC to update public on activities through monthly press briefings. • Legislative Framework – Establish Law Reform Task Force to review Anti-Corruption Act (2000) by end July 2006, and agree changes to Act in conformity with UN and AU conventions on corruption by end 2006. • Declaration of assets of public servants to be included in amended legislation. • Hold consultations with stakeholders for ACC fiat to be embedded in law by end of 2006.
<p>2. Auditor General and PAC Reports</p> <p><i>Commitment: To reduce the time lag for reports of the Auditor General and the Parliamentary Accounts Committee to be made public. To accelerate recovery of losses identified in PAC reports.</i></p>	<ul style="list-style-type: none"> • Auditor General’s Office strengthened to present audit reports to Parliament according to law (within 12 months of the end of each year). Reports for 2004 and 2005 by end December 2006. • Auditor General’s reports - Any obstacles that may prevent the reports of the Auditor General being made public when laid before Parliament removed by end December 2006. Auditor General’s reports for 2001-2003 made public by end December 2006. Subsequent reports to be made public when laid before Parliament. • 1996-1999 Parliamentary Accounts Committee (PAC) reports – Achieve progress in recovery of losses for PAC reports 1996-1999 including through withholding of payments. Make losses identified in PAC report public and state explicitly what actions have been taken to recover funds. • In the spirit of transparency, make audit reports of all programmes and projects managed by donors available to Government and the public.
<p>3. Procurement</p> <p><i>Commitment: To support full implementation of the Public Procurement Act</i></p>	<ul style="list-style-type: none"> • Strengthen NPPA – human resource capacity of NPPA to be strengthened (core staff in place by August 2006 with full staffing plan implemented thereafter). Ensure NPPA practices conform to international standards. • Publication of procurement regulations by end Dec 2006. • Publication of 2006 procurement plans for key Ministries, as approved by MOF. • Tender opportunities and information on contracts awarded made public on quarterly basis through NPPA website, notice boards and published bulletin. • 2007 procurement plans prepared prior to start of fiscal year (by end Dec 2006).
<p>4. Civil Service Reform</p> <p><i>Commitment: To accelerate the pace of</i></p>	<ul style="list-style-type: none"> • Build capacity of the civil service to ensure a sufficient skills-base and address issues of retention and sustainability. • Complete ‘roadmap’ for civil service reform by October 2006 including a framework for training, payroll verification,

¹⁸ ‘Significant public interest’ refers to cases involving senior public servants (i.e. not low-level corruption)

<p><i>civil service reform to improve the capacity of Government to deliver goals of PRSP</i></p>	<p>and pay and grading policy.</p> <ul style="list-style-type: none"> • Implement recommendations of Management and Functional Reviews approved by Cabinet (Education, Health, Agriculture, Local Government, and Defence) by July 2007. • Human Resources Management Office – minimum requirements for HRMO to be in place and operational by end 2006.
<p>5. Improving Service Delivery</p> <p><i>Commitment: To improve provision of basic services in health, education and agriculture using Public Expenditure Tracking Survey (PETS) indicators and Service Delivery Perception Survey (SDPS). Results to be made public.</i></p>	<ul style="list-style-type: none"> • In July and December 2006, PETS and service delivery perception surveys carried out . In 2007, one PETS and SDPS conducted by June 2007. Results to demonstrate significant improvements in delivery of basic services: <ul style="list-style-type: none"> - % of teaching and learning materials arriving at destination compared to 2003 figures; - % of essential drugs arriving at destination compared to 2004 figures; - % of seed rice arriving at destination compared to 2004 figures; • PETS Action Plans integrated into broader Public Financial Management Action Plan and implementation monitored by committee to ensure line ministries improve service delivery and reduce leakages. • PETS and SDPS methodology and findings to be made public. Results to be widely publicized within one month of publication.
<p>6. Extractive Industries Transparency Initiative (EITI)</p> <p><i>Commitment: To ensure full implementation of EITI</i></p>	<ul style="list-style-type: none"> • EITI Implementation Framework - In collaboration with development partners, develop EITI Implementation Framework by July 2007. • Provide update on progress and formally endorse EITI at the Annual Meeting in Oslo in October 2006.
<p>7. Decentralisation</p> <p><i>Commitment: To ensure full support to implement decentralisation policy</i></p>	<ul style="list-style-type: none"> • Functions and resources to be devolved to local councils as per the Local Government Act 2004 and devolution schedule, as long as financial management and accountability requirements are met. • High-level political coordination through quarterly meetings of Inter-Ministerial Committee (IMC) and follow-up to ensure implementation by line ministries and local councils. • Number of local councils meeting the financial management and accountability requirements under the LGA (2004) to be increased annually, in part by hiring qualified finance officers as local council treasurers.
<p>8. Non-State Actors</p> <p><i>Commitment: To enhance dialogue and interaction with non-state actors including civil society and the private sector on key governance, accountability and poverty reduction issues</i></p>	<ul style="list-style-type: none"> • In collaboration with civil society, develop a national strategy to improve dialogue and interaction on key governance, accountability and poverty reduction issues. • Support capacity-development of civil society and the private sector to engage constructively with Government in support of poverty-reduction and growth outcomes. • Support a more conducive investment environment for local and international private sector actors by reducing barriers to investment. • Facilitate consultations to align NGO funding with national priorities

<p>9. Anti-Money Laundering</p> <p><i>Commitment: Support implementation of anti-money laundering legislation</i></p>	<ul style="list-style-type: none"> • Government to introduce regulations in support of the Anti-Money Laundering Act (2005) by end 2006 • Increase capacity of Bank of Sierra Leone (BoSL) to play its role as central agency to oversee and monitor implementation of the Anti-Money Laundering Act (2005)
<p>10. Elections</p> <p><i>Commitment: To ensure free and fair elections in 2007</i></p>	<ul style="list-style-type: none"> • Support NEC to carry out necessary preparations for elections including boundary delimitation process, voter registration and sensitization. • Political Parties Registration Commission (PPRC) to be strengthened to ensure level playing field between political parties. • Civil society to play effective monitoring role and to report on conformity of Sierra Leone elections with international standards and guidelines.