



**ABRIDGED VERSION OF THE
NATIONAL ANTI-CORRUPTION STRATEGY
2014-2018**

N A C S



INTRODUCTION

The Sierra Leone National Anti-Corruption Strategy (NACS) 2014-2018 sets an ambitious target to ensure the delivery of the Agenda for Prosperity (AfP). It seeks to achieve this through deepening integrity, enhancing the enabling environment for a corrupt-free Sierra Leone, accept the need for transparency, accountability; and the rule of law.

The Government has adopted two national anti-corruption strategies, which focused on prevention and constructive engagement. Implementation of the previous strategy (2008-2013) ended in 2013. This gives rise to the crafting of the next five-year national anti-corruption strategy (2014-2018).

THE ENABLING LEGISLATION

Sub-section (1) of Section (5) (c) provides that, the Commissioner, as head of the Commission be responsible for coordinating implementation of the national anti-corruption strategy.

DEVELOPMENT OF THE NATIONAL ANTI-CORRUPTION STRATEGY

The issue of corruption is focal in the Government's development agenda; placed under Pillar 7 (Governance and Public Sector Reform) in the Agenda for Prosperity (AfP) The AfP states that the Anti-Corruption Commission (ACC) was established to provide a framework for the implementation of the National Anti-Corruption Strategy (NACS) and as such lays the foundation for the collective approach to deal with graft.

Whilst the first national anti-corruption strategy (2005) adopted two approaches i.e. prevention and enforcement, the second strategy (2008- 2013) adopted an incremental approach by building on the first. It broadens the prevention aspect and incorporates the National Integrity System with a focus on constructive engagement and institution-strengthening measures across the public sector.

Going forward, the new NACS (2014-2018) is both political (reflecting priorities in the country) and technical (built on the basis of various studies, public consultations, surveys etc.)

NATURE OF THE NATIONAL ANTI-CORRUPTION STRATEGY 2014-18

Vision Statement

Driven by its Vision, the strategic aspiration and priorities of the NACS are derived from its niches.

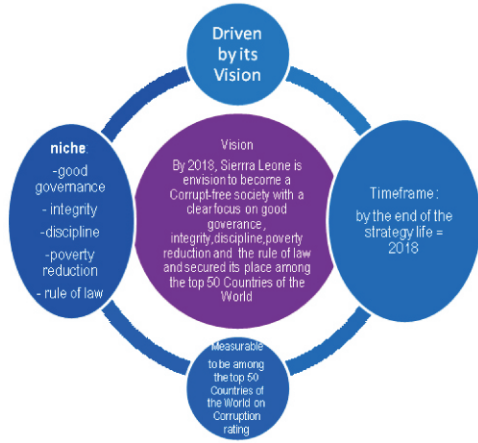


Figure 3. Vision statements and characteristics

1.1 Mission Statement

Guided by its Mission

The essence of NACS is also demonstrated in its mission statement.

MISSION

'To promote a corrupt-free society in which good governance, effective and efficient public financial management, integrity, accountability and the rule of law are upheld

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IMPLEMENTATION MATRIX EXTRACT

National Integrity System Pillars

		- Executive						
1	To ensure assertion of the zero tolerance approach to corruption To ensure operation alization of zero tolerance for corruption	Lack of political will and leadership undermines the credibility of NACS	Demonstrate political leadership and commitment to NACS	H.E the President should set the tone at the top and cascade to the Cabinet Ministers, Chief Justice, key political figures and the private sector	Quick Win (within the first 6 months)	Office of the President, Cabinet Ministers, Political party leaders Heads of MDAs & Private sector institutional heads	To be determined	- Percentage of resources allocated to Anti-Corruption Agencies -Buy-in to NACS by all agencies and opposition parties
				Party leaders, key political figures to make specific public pledges against corruption in election campaign and thereafter	Short-term action (Within one year)	Office of the President Political parties PPRC NEC	Ditto	Percentage of anti-corruption pledges signed Number of anti-corruption pledges made public
				Media to encourage debate of corruption issues in run up to the election	1-5 years	SLAJ IMC Civil Society/NGO Political parties PPRC NEC	Ditto	National forum for debating anti-corruption established in all regions Number of anti-corruption debates

"Think big" and "start small" – the implementation plan schemes a series of reforms across all the integrity pillars, so that each will complement the other over time, providing the required horizontal accountability; giving priority to achievable, early, low cost actions which can demonstrate prompt and visible results ("quick wins");

"Scale quickly" i.e. build on early success by expanding from these quick wins to ensure the adoption of effective reforms by other integrity pillars. Change management strategies and approaches tailored to the context, will enable rapid and sustainable change. Thus, it is critical that we agree and successfully implement quick wins within the first six months. Other priority short-term actions will follow during the first year, even during the first six months. These will be reinforced by institutional and legal reforms, to be implemented over 1 to 5 years.

REVISION OF THE STRATEGY

The ACC shall revise the Implementation Action Plan after first two years of implementation in accordance with new priorities and needs for inclusion of bigger number of institutions in implementation of the Strategy.

IMPLEMENTATION MECHANISM

Implementation of the Strategy is the responsibility of the stakeholders earmarked in the Implementation Action Plan. However the focal point will be the Implementation Committee, which should be established and headed by Chairman, His Excellency the President. ACC will operate as the secretariat in coordinating the Committee. The structure of the committee is given below:

COMPOSITION OF IMPLEMENTATION COMMITTEE

Representatives of the following:

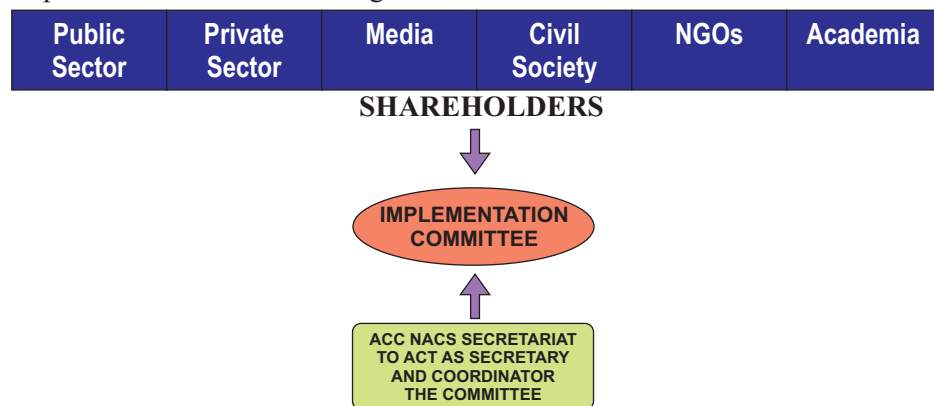


Figure 4. Mission Statement and defined elements

1.2 Value Statement

‘Maintaining high standard of integrity, discipline and ethics amongst its Citizenry and Stakeholders’

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Figure 5. Value Statement

By the end of the time frame set for the Strategy, it is expected that the following goals will be achieved:

The General goal of the new anti-corruption Strategy is to contribute to open-minded debates and consistent reduction of corruption, strengthen integrity and building citizens’ trust in institutions of public governance and promote the principle of zero tolerance of corruption.

The long-term objective of the NACS is to promote a corrupt-free society by encouraging all stakeholders in the fight against corruption, through a holistic and inclusive programme

The short-term objective of NACS is to establish a high set of public standards, and set in motion systemic improvements that will strengthen the national integrity system and delivery of the agenda for prosperity.

Core Principles

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The short-term objective of NACS is to establish a high set of public standards, and set in motion systemic improvements that will strengthen the national integrity system and delivery of the agenda for prosperity.

- ✓ Self-Assessment: provides for periodic evaluation and assessment of corruption risks by responsible institutions, in order to improve implementation of this Strategy and its corresponding Action Plan.
- ✓ Respect for the rule of law
- ✓ Independence of the Judiciary
- ✓ Strong political will and leadership
- ✓ The strategy is an integral part of the overall public sector reform process rather than a stand-alone instrument for combating corruption;
- ✓ Transparency and accountability
- ✓ Inclusiveness: mandates all responsible public authorities in Sierra Leone to improve and enhance co-operation with civil society
- ✓ Controlling corruption can only be achieved by combined measures and efforts, including the launching of criminal, civil, disciplinary and administrative proceedings, along with preventive measures and raising awareness/education campaigns. This can be achieved through effective mainstreaming with other law enforcement agencies;
- ✓ Corruption is a systemic problem and therefore, in order to control it in all MDAs, anticorruption activities must become an integral part of the management process;
- ✓ To ensure the consistent application of the NACS, the coordination of the implementation of the Strategy must be centralized with the ACC as provided under the law. In this regard, the Anti-Corruption Commission shall be responsible for the coordination and monitoring of the implementation.
- ✓ Every citizen's obligation is to play an active role in confronting corruption at all levels. Every citizen has a moral obligation to report any form of corruption.

THE GAPS IN THE 2008 -13 STRATEGY

A review of the previous strategy identified the following challenges: that;

- it was more public sector focused with no adequate provision for private sector corruption
- even though the law makes provision for mainstreaming with other front-line agencies there were limited mainstreaming identified
- issues of financial and economic crimes were not built into the strategy
- lack of ownership, as MDAs were questioning where to obtain the resources to implement the corruption control measures
- unrealistic planning, inadequate prioritization of reforms, insufficient involvement of non-state actors; and the lack of adequate coordination and monitoring.

WHY THE ZERO-BASED APPROACH?

Undoubtedly, boldness is required to deal with corruption. An anti-corruption strategy must also go beyond first principles, such as adopting market-friendly policies, reduce red tape or provide training. Entrenched and systemic corruption requires administering a shock in order to disturb a corrupt equilibrium. This is the primary reason why the zero-based approach was adopted in mapping the strategy.

- c. Developing Corruption Prevention Plans (CPP): - The CPP should provide the mechanism for implementing the Institutional Anti-Corruption Policy. To this end, each institution is required to develop and implement a Corruption Prevention Plan (CPP). The CPP must incorporate clearly set SMART objectives and targets to be met, activities and sub activities to be implemented, desired outputs/outcomes to be achieved, clear and objectively verifiable Indicators for monitoring progress and evaluating results and clear responsibilities for implementation and resource mobilization.
- d. Developing Codes of Conduct: - All public institutions are expected to develop specific Codes of Conduct and Ethics for their employees to ensure that staff are committed to the discharge of their duties. The Codes should be binding on Board Members, Management and Staff.
- e. Integrity Training: - Each public institution should train Integrity Assurance Officers (IAOs) to offer technical guidance to management on the implementation of the Anti- Corruption Strategy and carry out sensitization workshops.

For mainstreaming to be effective, the parties need to sign a Memorandum of Understanding (MOU) for the duration of the strategy and the authority, responsibility and obligation should emanate from the Strategy. It is imperative to note that, even though the ACC has an independent prosecutorial power, the Chief National Prosecutor in Sierra Leone is the Attorney General and Minister of Justice. The ACC should be able to liaise with the Office of the Attorney General. The Judiciary is also expected to manifest its posture in the fight against corruption.

IMPLEMENTATION OF THE STRATEGY-

The main instrument for the implementation of the NACS remains its corresponding Implementation Action Plan, an integral part of this document.

CORE PRINCIPLES OF THE IMPLEMENTATION ACTION PLAN

This is based on the following strategic principles, which have proven critical in reform programmes worldwide:

"Political leadership" – setting the tone at the top:- early and continual visible signs of political endorsement from the highest level are planned, so that everyone in Sierra Leone can see the extent of commitment to the success of NACS;

4. International Competitiveness: this is a function of productivity and production of high quality goods and services that enter into international trade and negotiations. Transparency an accountability training and adherence to ethical standards, policies and procedures as well sanctions applied to culpable parties are key corruption control measures in this area.
5. Labour and Employment; Recruitment: postings, transfers and emoluments must be based on merit and completely devoid of regional and ethnic considerations.
6. Social Protection: equal opportunity for all vulnerable groups.
7. Governance and Public Sector Reform: all processes must be based on democratic principles and adherence to the rule of law.
8. Gender and Women’s Empowerment: equity and empowerment hold the key to full and effective participation of women in national development processes. However, meritocracy must guide and inform gender equity and empowerment not to defeat the purpose of instituting corruption controls.

MAINSTREAMING

Given the cross-cutting nature of anti-corruption interventions, it is proposed that this Strategy moves away from stand-alone anti-corruption programmes, where ACC is the only institution leading the fight, to mainstreaming anti-corruption as an integral dimension of the design, implementation, monitoring and evaluation of programmes and policies. Effective anti-corruption mainstreaming requires credible leadership, adequate internal structures, effective coordination and monitoring mechanisms, supporting organisational incentive systems, and need to be backed by adequate financial and staffing resources, skills and expertise. Corruption mainstreaming will entail the following:

- a. Putting an anti-corruption policy in place: - MDAs are required to formulate and implement an Anti-Corruption Prevention Policy to address issues of corruption.
- b. Operationalising corruption prevention/integrity committees: - MDAs are required to form and operationalize Corruption Prevention/Integrity Committees in accordance with the relevant guidelines under the proposed Public Service Integrity Programme. The ACC’s role will be to coordinate anti-corruption strategies in MDAs

THE NEW FRAMEWORK

Based on the review, the Technical Expert Team developed a framework for the new national anti-corruption strategy, which was overwhelmingly adopted during the dialogue and stakeholders’ consultation process. The framework for the new strategy is as follows:

- Zero based-every activity and reports were re-evaluated.
- Risk based- focuses on sectors or institutions with high propensity for corruption
- People driven- bottom-top approach
- National Ownership (people& donors)
- Stakeholders participation (civil society)
- Knowledge based design (analysis of local Knowledge)
- Effective coordination and monitoring
- Effective mainstreaming (with other Corruption Agencies like FIU, Ombudsman etc.)

KEY FEATURES OF THE 2014-18 NACS

This strategy has the following key features:

- national ownership
- knowledge based design,
- stakeholders’ participation,
- strategic priority setting and sequencing,
- effective coordination, monitoring and evaluation.

WHAT DOES THE STRATEGY DO? AND WHAT BENEFITS THERE ARE?

The strategy itself is hinged upon a multi-pronged approach to tackle corruption. It relies on a combination of prevention, enforcement and suppression measures, embedded in the ethical, legal, institutional, social and systemic framework of governance in Sierra Leone. It provides concrete steps and actions to be undertaken in order to progressively eliminate corruption.

The benefits which the NACS will bring include: ensuring a shared understanding of the causes and impact of corruption and to bring together the various measures as a coherent strategy; creating a route to implementation. It will propel the long road to effective public financial management; political accountability, transparency, good governance, effective service delivery and the rule of law.

METHODOLOGY

The dialogue and consultations were held between September and December 2013, and embraced a two-fold approach as follows:

One-on-One Engagement

Focus group discussion and Regional Workshops

CLOSURE AND STOCK-TAKING OF THE 2008-13 NACS

The following initiatives in the previous NACS 2008-2013 will be taken on-board the new strategy as institutional strengthening interventions:

- Mainstreaming anti-corruption initiatives in the public sector;
- Integrity Management Committees;
- Monitoring implementation by civil society monitoring groups
- Dialogue forums and consultations as well as focus group discussions, but the impact of these engagements will need to be assessed.
- The declaration of assets should be strengthened with declarations being done both electronically and manually as well as incorporating random check and monitoring.
- The systems and processes review to be aligned to focus on corruption control measures and the integrity of public officers;
- Building partnerships with other graft front line agencies

A number of challenges must be addressed as a matter of priority, including: Inter-institutional co-operation and co-ordination; Monitoring processes should be strengthened and include pro-active engagement and collaboration with civil society, cooperation with independent institutions and local government. Support and firm commitment from the top will be required to implement the objectives and measures of the Strategy and Action Plan will be required from the top leadership in all public institutions,

Framework of the National Integrity System

The TET has used the concept of the National Integrity System to analyse the problem of corruption in a productive and action-oriented way. Consultations and dialogue revealed overwhelmingly that corruption is systemic in Sierra Leone.

National Integrity System

A country's national integrity system comprises those institutions or sectors (sometimes known as "pillars") which, when operating with high standards of effectiveness, transparency and accountability, support each other to maintain high standards of national integrity and low levels of corruption. This reflects the concept of horizontal accountability: each pillar will act as a watchdog on at least one other. Together, they maintain the integrity of the system.

There is a positive correlation between control of corruption and the achievements of the goals of the AfP. The rationale for linking corruption control with the pillars of the AfP can be found in the huge financial and human resource wastage in public sector management and the resultant shortage of resources for development activities. The linkage can be achieved through mainstreaming of corruption control in each of the eight pillars of the AfP. This can be done through identifying and incorporating corruption control measures and indicators in the agenda as follows:

1. **Economic Diversification:** this presupposes the expansion and deepening of the economic sector (mining, agriculture, industry/manufacturing, commerce, etc.) to ensure value addition and maximization of return on investment in these sectors. These have high risks of corruption and corruption control measures should include transparency and inclusiveness in the entire process of negotiation of agreements, contracts, determination of the tax system, royalties and fees as well as sound environmental protection to protect the welfare of future generations
2. **Managing Natural Resources:** these constitute the drivers of economic growth and development. Mining, marine, forest land, water resources constitute the main resource-base of the country. Corruption control measures should include ensuring that foreign investors are carefully screened, agreements and contracts be transparently negotiated and executed and a participatory surveillance and monitoring mechanism be devised and followed in the entire value chain of harnessing natural resources in mining, environmental and agricultural activities alike.
3. **Accelerating Human Development:** this is the most valuable and sustainable asset of any nation and must be carefully nurtured and developed. It is also a high-risk area for corruption. Control measures must include equity and transparency in all aspects of human development (support to institutions' education and training, financial resource allocation, guidance and counseling) jobs; income and related opportunities open to all.

The strategy alignment should be built on:

- Integrity, transparency and accountability
- Efficient service delivery and poverty reduction
- Governance at centre -stage as a crosscutting constraint/enabler.

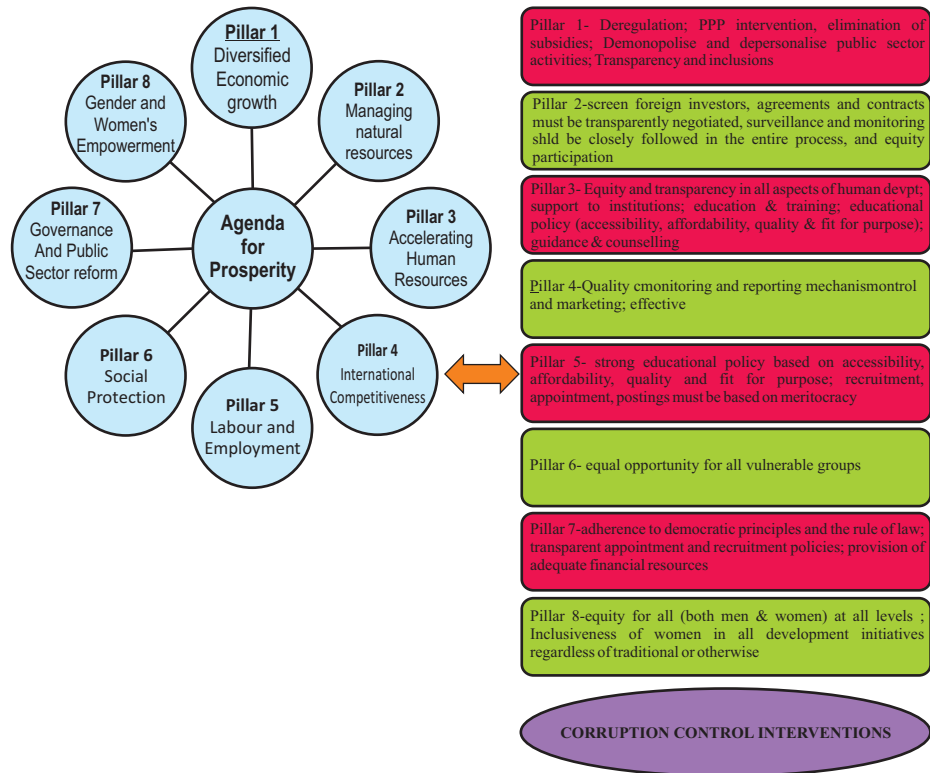
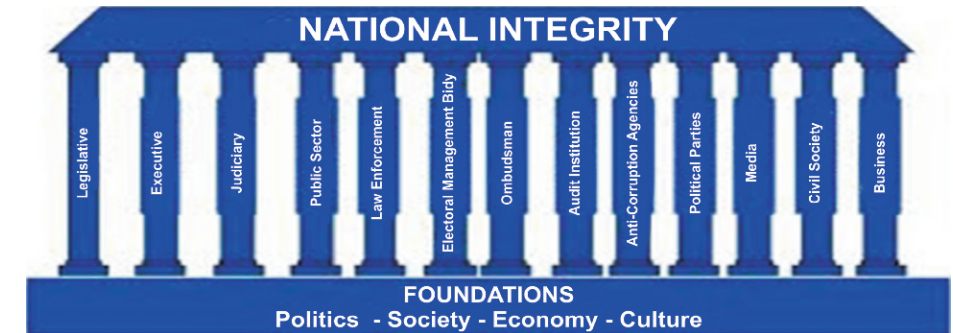


Figure 8- shows linkages of the AfP pillars with corruption control interventions

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Sierra Leone's National Integrity System (NIS) has the following pillars



The NACS (2014-2018) is built around common themes and a toolkit of measures: The NACS will be openly adopted and implemented transparently so that all can see the results. If some measures fail, others must be adopted as NACS will adapt and mature as we learn from our successes and failures.

Elements of the strategy

The strategy aims at tackling corruption in Sierra Leone through a multi-pronged balanced approach and combination of actions on three mutually reinforcing fronts as provided for within the ACC Act 2008:

Prevention – systemic, institutional, legislative, administrative reforms and public education and awareness raising, aimed at building democracy, create political competition, poverty reduction, and delivery of public goods and services

Enforcement – improvement in the legal and institutional arrangements for the detection, investigation and prosecution of corruption.

Suppression – the regular and systematic measuring of the nature, causes and extent of corruption through reliable and verifiable data collection, analysis and co-ordination;

Themes of NACS

Cutting across these three broad fronts of action, are a number of consistent themes.

THEMES OF THE ANTI-CORRUPTION STRATEGY

- ✓ Political Will and leadership: demonstrations by a range of key leaders of commitment to change; setting the tone at the top
- ✓ Transparency: openness in dealing with the public and public opinion
- ✓ Accountability: responsibility for the performance of public duties and being answerable for all acts and omissions
- ✓ Meritocracy: promotion of the most talented and able to perform
- ✓ Deregulation: systematic removal of unnecessary regulations, processes and procedures
- ✓ Standardisation and automation: simplification and widespread use of technology
- ✓ Efficiency of service delivery: progressive performance improvement
- ✓ Professionalism and competence: investment in recruitment and training
- ✓ Public participation: active engagement of civil society and the media

Change management: measures which facilitate change, for example, capacity building and awareness raising.

An Anti-Corruption Toolkit

AN ANTI-CORRUPTION TOOLKIT

The recurring themes of the strategy are mirrored in a core set of measures – these form the anti-corruption toolkit, and are summarised below.

Institutional Anti-Corruption policies:-MDAs should be encouraged to develop their own Anti-corruption policies with regard its employees, suppliers and other third parties;

Adherence to the NPPA Act and Regulation: MDAs must comply with the relevant procurement Act, regulations and manual and NPPA and the ACC should observe all GoSL and Donor procurement above \$1 million;

Development of Conflict of interest rules for MDAs: Conflict of interest must be avoided. Rules for conflict of interest must be developed and popularise to all MDAs and Donors

Access to information legislation: gives citizens the legal right of access to government documents without having to prove a special interest and the burden of justifying non- disclosure falls on the government administration.

Integrity pledges: a set of promises and undertakings made publicly by a group, typically government ministers, to a common overseer, whereby any failure to perform the promise entails resignation from or removal from the group.

- ✓ Codes of conduct: a set of ethical standards to which institutions adopting the code will adhere in order to demonstrate their commitment to eliminate corruption from their activities.
- ✓ Conflict of interest provisions: a law, regulation or rule of business prohibiting participation in decision making whenever private interests might be present in the performance of public duties.
- ✓ Assets declaration and monitoring: an essential statement by all prominent public office holders, which is effectively monitored.
- ✓ Integrity pacts: an integrity pact is a formal no-bribery pact made by a group of related stakeholders (e.g. contractors tendering for procurement contracts) whereby they set open and verifiable undertakings not to engage in corruption of any kind.
- ✓ Whistle-blower provisions and protection: a key mechanism to overcome the culture of tolerance of corrupt practices, people must be provided with the means to report responsibly any abuses of power or acts of corruption
- ✓ Vigilance units: groups appointed throughout the public sector with responsibility for verifying compliance with integrity pacts, codes of conduct and anti-corruption rules and procedures.
- ✓ Integrity testing: random checks on those in vulnerable positions.
- ✓ Citizens Charters: set out the public services a government agency will offer and how it will respond to members of the public.
- ✓ Service delivery surveys and report cards: publicised reports of tests of anti-corruption standards and targets, based on verified surveys, which departments will welcome as recognition of due performance and justification of appropriate resources.

Linking the Control of Corruption with the Agenda for Prosperity (AfP)

This strategy links the pillars of the AfP with the control of corruption. This is important because all the growth projections in the AfP will not be achieved if we cannot control corruption. Furthermore, Transparency International (TI) points out that corruption may damage not only a country's economy, but also its political systems and institutions, civil society, and natural environment.

Therefore, a strategy of corruption control intervention aligned with the Agenda for prosperity and built on the policy triangle of growth, poverty reduction and governance is critical.