



Sierra Leone National Anti-Corruption Strategy (2019-2023)

*“A PUBLIC-PRIVATE INITIATIVE AGAINST
CORRUPTION”*

“...Confronting corruption as a threat to every sphere of national development and building an ethical and accountable republic that promotes zero tolerance for corruption to inspire integrity, transparency, accountability and the rule of law”

National Anti-Corruption Strategy

(NACS)

Sierra Leone

2019 – 2023

“...Confronting corruption as a threat to every sphere of national development and building an ethical and accountable Republic that promotes zero tolerance for corruption to inspire integrity, transparency, accountability and the rule of law”

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ACRONYMS AND ABBREVIATIONS

ACC	Anti-Corruption Commission
AU	African Union
AUCPCC	African Union Convention on Preventing and Combating Corruption
ASSL	Audit Service of Sierra Leone
ASYCUDA	Automated System of Customs Data
BSL	Bank of Sierra Leone
CPI	Corruption Perception Index
CSO	Civil Society Organisations
DFID	Department for International Development
EITI	Extractive Industries Transparency Initiative
EPA	Environmental Protection Agency
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
FSS	Fiscal Strategy Statement
GBBA	Government Budgeting & Accountability Act 2005
GDP	Gross Domestic Product
GST	General Sales Tax
HRMO	Human Resources Management Office
IAO	Integrity Assurance Officer
IMC	Independent Media Commission
IFMIS	Integrated Financial Management Information System
LGFD	Local Government Finance Department
LOD	Law Officers' Department
MCC	Millennium Challenge Corporation
MDAs	Ministries, Departments and Agencies
MFRs	Management & Functional Reviews
MLA	Mutual Legal Assistance
MOFED	Ministry of Finance and Economic Development
MTEF	Medium Term Expenditure Framework
MTI	Ministry of Trade and Industry
NACS	National Anti-Corruption Strategy
NDP	National Development Plan (2019-2023)
NEC	National Electoral Commission
NGO	Non-Governmental Organisation
NIS	National Integrity System
NPPA	National Public Procurement Authority
NRA	National Revenue Authority
NSC	National Security Council
OARG	Office of the Administrator and Registrar General
ONS	Office of National Security
PAC	Public Account Committee
PIC	Public Internal Control
PEPs	Political Exposed Persons
PFM	Public Financial Management
PSRU	Public Sector Reform Unit
PPP	Public-Private Partnerships
PSRU	Public Sector Reform Unit
SP	Strategic Pillar

FOREWORD

Sierra Leone remains committed to the fight against corruption to deliver both the National Development Plan (NDP) and achieving the Sustainable Development Goals (SDGs). The Fourth National Anti-Corruption Strategy (NACS) for the period 2019-2023 is the successor to the NACS 2014-2018. This Strategy, like the three National Anti-Corruption Strategies that preceded it, is aimed at attaining the Vision of Confronting corruption as a threat to every sphere of national development and building an ethical and accountable Republic that promotes zero tolerance for corruption to inspire integrity, transparency, accountability and the rule of law. It builds on the achievements and lessons learned during the implementation of the previous NACS.

Sierra Leone has been, unfortunately, a typical case of bad governance. In the last two decades, we have seen an exponential upsurge in the scourge of corruption with perhaps the steepest rise coming in this last few years. It is now that the demand for accountability became more blatant than ever before. The result of such widespread endemic corruption has been a loss of legitimacy of state institutions.

This NACS calls for changing how we run the affairs of the state with the view to reducing corruption in the society and laying the basis for good governance in the country. Achieving the goals in both the NDP and SDGs will be possible only if we manage to reduce corruption levels to the bare minimum, even if eradication remains an elusive goal.

The country has made substantial development with the introduction and implementation of the various anti-corruption measures, but there are still challenges. The adoption of this strategy that transcends political boundaries and tackles corruption holistically through prevention, education, and enforcement not only in the public sector but also in both the private and religious sectors is necessary.

The National Anti-Corruption Strategy and Action Plan is an unqualified contribution to the fight against corruption and the promotion of national development. It contains strategic action plans identified and agreed upon by stakeholders, including the private sector, during nationwide consultations. The greatest strength of the NACS is that it is directly aligned to the medium-term National Development Plan, making the Strategy an integral part of the regular annual activities of public institutions including the Ministries, Departments, and Agencies (MDAs) as well as the private sector.

Acknowledgments

The Anti-Corruption Commission is grateful for the valuable advice and input provided by various ministries, departments, and agencies of Government, Religious Organisations, Political Parties Leaders, and Private Sector. We must acknowledge the support of His Excellency the President Dr. Brigadier Julius Maada Bio for the Project. His constant involvement in the process was both a source of support and guidance. We are also grateful to the Vice President, Chief Minister, and Heads of Ministries, Department, and Agencies for their inputs and contribution.

The Anti-Corruption Commission appointed a team of Technical Experts (TET) to assist the Commission in drafting the National Anti-Corruption strategy 2019-2023. The TET are experts in various fields ranging from the public sector, financial, legal, private sector, education, corporate governance, monitoring and evaluation, fraud, corruption. These Experts include:

Mohamed Abu Sesay- Chairman; Augustine Sorie-Sengbe Marrah; William Sahr Kamanda; Valnora Edwin; Dr. Fatou Taqi; Joseph Pemagbi; Edward Massaquoi

The TET assisted in their work by the Anti-Corruption Commission National Anti-Corruption Strategy Secretariat and the various ACC districts managers and officials.

The drafting of the National Anti-Corruption Strategy also benefitted by the valuable feedback provided by the public using social media forums like Facebook and WhatsApp messages.

Nevertheless, NACS belongs to the stakeholders, the hundreds of individuals who contributed to a nation-wide consultative process. We acknowledge the individuals, civil society, media, and the international development community, who enriched the consultative process for the preparation of this National Anti-Corruption Strategy for the period 2019-2023.

If we try to acknowledge every person who contributed the list would be very long. However, as stated above, the Report itself belongs to the stakeholders, the hundreds of Sierra Leoneans who contributed through their views. The individuals varied from the business community, bureaucrats, judges, justices of the higher Judiciary, to slum dwellers and low-income groups. One thing was common wherever the Technical Expert Team went; there is an extreme desire in the country to eradicate corruption. People are looking at the top leadership, the politicians, the bureaucrats, the businessmen to deliver. At the slightest movement in the right direction, they would jump to support the process.

Tables and Figures

Part 1

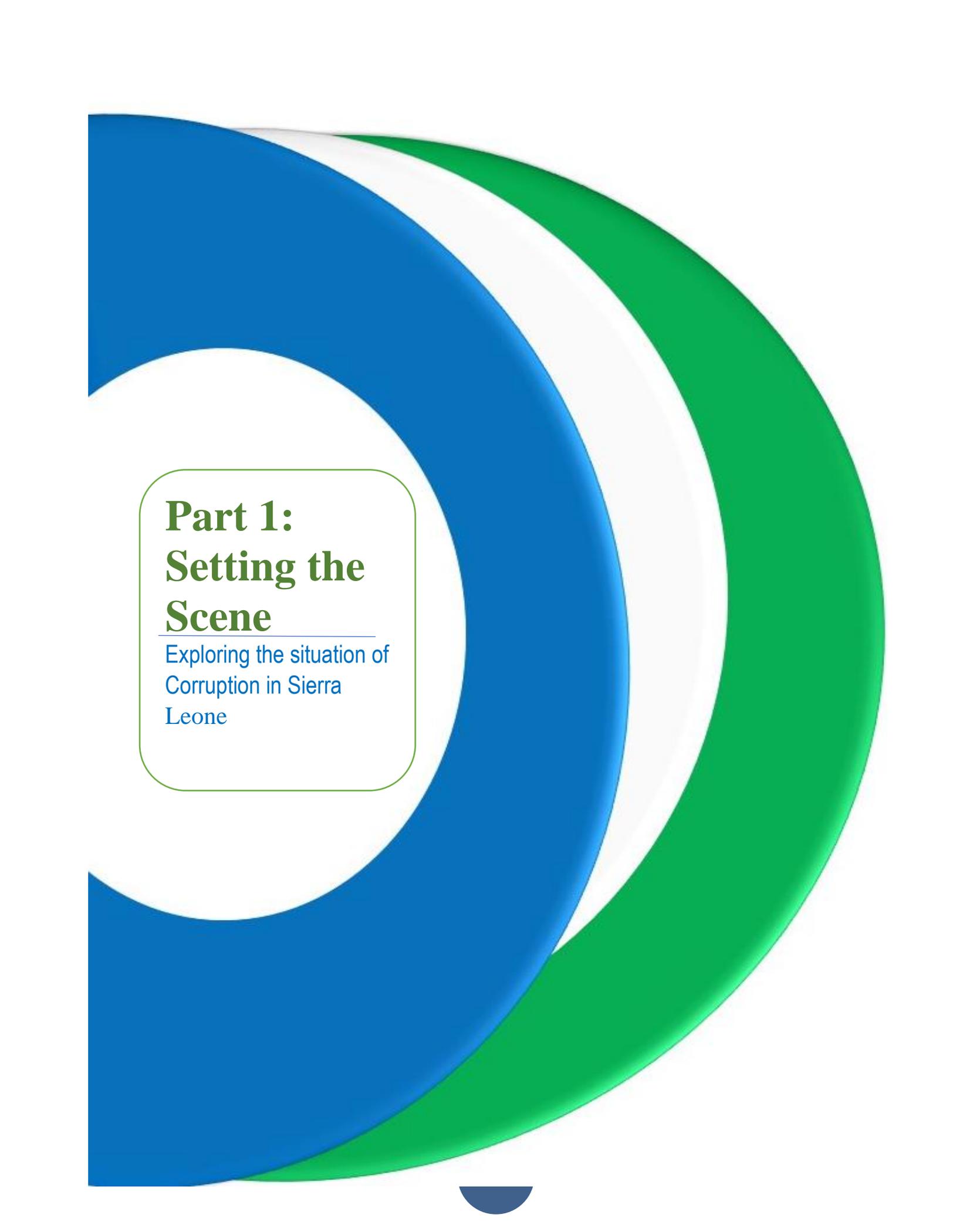
Figure 1: Transparency International Corruption Perception Index (CPI) 2018

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Part 1: Setting the Scene

Exploring the situation of
Corruption in Sierra
Leone

PART ONE: SETTING THE SCENE

Introduction

This national strategy serves as a model for developing a set of shared responsibilities across sectors, to encourage collaboration within and between sectors, and to direct renewed enthusiasm towards the aim of reducing corruption and building an ethical society.

The strategy is intended to intervene at the legal, policy, technical and institutional levels within the public, religious, and private sectors. At the policy level, the intention is to establish a system which supports an improved alignment of private and public interests, while at the Institutional level, the strategy intends to strengthen the effectiveness, efficiency, and synergy of the institutions, laws, and measures designed to prevent and combat corruption as well as engage the public more actively.

There is no single solution to fighting corruption. This strategy adopts a **three-pronged approach**: enforcement, prevention, and education. Enforcement is at the centre of this strategy, the reason being that any successful fight against corruption must start with practical enforcement actions on major targets. To demonstrate to the public the government's determination to fight corruption at all costs, as well as to demonstrate the effectiveness of the anti-corruption agencies like the ACC, Audit Service, Judiciary, Police and Financial Intelligent Unit. Without that, the public would be reluctant to come forward to report corruption. Successful enforcement assists in identifying problem areas for corruption prevention review and can clear any human obstacle in the discussion. The successful enforcement stories also provide a basis for public education and deter other corrupt officials. In addition prevention and education are essential with an initial focus on (1) Strengthening the capacities of the dedicated anti-corruption and public accountability bodies; (2) Mainstreaming of anti-corruption and governance principles into the work of the MDAs and private sectors; (3) Strengthening accountability, integrity and transparency at the central and local government levels as well as CSOs and private sector..

The strategy has outlined clear objectives of changing the logic of corruption and anti-corruption in Sierra Leone, by adopting an approach based on eight (8) pillars of enforcement, prevention; public engagement; sustainable partnership, ethical re-orientation in public, religious, civil society and private sectors.

The National dialogue acknowledged that corruption undermines economic development, political stability, the rule of law, social development, disrupts social order, and destroys public trust in the governance system. In spite of our enormous natural resources, funds meant for the development of infrastructure in education, health and security sectors, among others, have been progressively plundered. But more importantly, the consensus was that 'Corruption **MUST** stop.'

The Government of Sierra Leone charged with the responsibility to ensure its citizens are free from poverty, servitude, and provided a quality of life where they can live without fear of injustice and tyranny. Nothing harms these objectives more than corruption in the organs of the state, private sectors, civil societies, and religious organisations. The first victim is the development process itself as inequalities get entrenched and law and order break down. Corruption in Sierra Leone is not restricted to a single sector; it permeates the entire society. Sierra Leone has been, unfortunately, a typical case of a corrupt society. In the last two decades, there has been an exponential upsurge in the scourge of corruption with perhaps the steepest rise coming in the period of the previous five years. The result of such widespread corruption has been a dwindling public trust in the state, leading to the weakening of the legitimacy of state institutions.

NACS belongs to everyone in Sierra Leone and calls for changing how we run the affairs of the state with the view to reducing corruption in the society and laying the basis of good governance in the country. Corruption is a systemic problem a disease infecting every aspect of political, social, and economic activity representing a persistent failure of governance. Sustainable development will be possible only if we can reduce corruption levels to the barest minimum, even if eradication remains an elusive goal.

Though intermittent efforts at combating the menace were undertaken they lacked the requisite level of 'Political Will,' and the effort going forward must, including the current accountability drive, be enforcement based and prioritise visible action.

This NACS focuses on controlling corruption on a sustainable basis with a broader vision and a targeted strategy to deliver that vision incorporating awareness, prevention, monitoring and combating corruption in all its forms; designed and implemented by a coalition of the state, civil society, and the private sector.

The National Anti-Corruption Strategy (2019-2023) is the result of extensive consultations and conversations amongst all stakeholders in the society— public services, private sector, religious organisations, civil society organisations, media, development partners and the citizens of Sierra Leone. It presents the agreed high-level guidance that will allow us all to work towards the delivery of a more effective and coalescence of both public and private efforts as a national response to the fight against corruption.

Arrangement of Sections

Part 1 sets the scene by exploring the situation of Corruption in Sierra Leone and referencing Global context and highlighting various sections. Sections that set out the results of the overall review and assessment of the nature, extent,

and impact of corruption; other sections then outline the root cause of corruption and anti-corruption initiatives, setting out many of the fundamental underlying causes of corruption.

Part 2 – The Framework. First, we set out the strategic vision and objectives; key themes and core toolkits to deliver that vision. The remainder of the sections comprise the strategic objective and Strategic pillars to deliver that objective;

Part 3 - sets out the arrangements for implementation. The implementation of the Strategy sets out under separate cover-Implementation Action Plan, but an integral part of the NACS.

Correlation with the National Development Plan (2019-2023) and Sustainable Development Goals (SDGs)

The Government of Sierra Leone's new Medium-term National Development Plan (MTNDP) 2019–2023 has been founded on a strong political commitment to deliver development results that would improve the welfare of Sierra Leone's citizens. The country has made substantial development with the introduction and implementation of the various anti-corruption measures, but there are still challenges. The adoption of this strategy will transcend political boundaries and tackles corruption holistically through prevention, education, and enforcement, not only in the public sector but also in both the private and religious sectors is necessary.

The National Anti-Corruption Strategy and Action Plan is an unqualified contribution to the fight against corruption and the promotion of national development. It contains strategic action plans identified and agreed upon by stakeholders, including the private sector, during nationwide consultations. The greatest strength of the NACS is that it is aligned to counter corruption that would impede the achievement of the goals of the medium term National Development Plan, making the Strategy an integral part of the regular annual activities of public institutions including the Ministries, Departments, and Agencies (MDAs) as well as private sector.

The NDP states regarding corruption that "In spite of these interventions such as; the implementation of the National Anti-Corruption Strategy, the introduction of Systems and Processes Review as prevention mechanism that targeted mainly Government MDAs and the smart public education and outreach strategies corruption continues to ravage the fabric of the Sierra Leonean society. This has significantly undermined the country's revenue generation capacity, destroyed the reputation of the country in the international community and pose a significant threat to the country's development potentials" Therefore, the National Anti-Corruption Strategy embodies the national vision in the fight against corruption. It is therefore intended to represent a broader vision and strategic alliance regarding the combatting against corruption in a bid to set the nation on the path towards national development.

It has been distinctly acknowledged that the most constant challenge to achieve the National Development Plan (NDP) and the Sustainable Development Goals (SDGs) is Corruption. The NDP took cognizance of this in cluster four-Governance and accountability for result in which it was identified that *‘Corruption and illegal financial flows have been some of the most persistent challenges facing successive governments, posing a significant threat to socio-economic growth, development, and stability. Abundant evidence shows that fighting corruption and illicit financial flows at all levels are crucial for alleviating extreme poverty and boosting private sector growth and development. The lesser the incidence of corruption in a country, the greater the likelihood of steady economic growth, as investor confidence will increase significantly’*.



In implementing the SDGs, we need to make sure that corruption is not standing in our way. SDG 16.5 recommends that we substantially reduce corruption and bribery in all its forms—as a means to many ends as it remains a significant threat to achieving all the SDGs. Assess how corruption plays a role in your area of SDG work. Look at corruption risks at different stages of your SDG implementation plan.

Does your plan include countermeasures to address these risks?

This strategy links the clusters of the NDP with control of corruption to ensure that critical priorities identified are achieved. This is important because all the growth projections in the NDP will not be achieved if we cannot control corruption. Dreher and Herzfeld (2005) estimate that an increase in corruption by about one-point (as measured by the perceptions based International Country Risk Guide index) reduces Gross Domestic Product (GDP) growth by 0.13 percentage points.

The Normative basis for a National Anti-Corruption Strategy

The driving force for Sierra Leone National Anti-corruption strategies was both external and internal. The previous three generations of anti-corruption strategies were more implicit and were linked directly or indirectly to public sector corruption prevention and push for democratic governance.

The global movement pushed countries to launch anti-corruption drives and, as a corollary to draft anti-corruption strategies. However, a real push came with the entry into force of the UNCAC in 2005 for which Sierra Leone became a signatory. Article 5 of UNCAC makes it mandatory for member countries to draft an "effective and coordinated anti-corruption policy" as well as "periodically evaluate relevant legal instruments and administrative measures." Article 6 of the Convention also requires the existence of preventive anti-corruption bodies to oversee and coordinate their implementation. The Anti-Corruption Act 2008 mandated the Commissioner of the ACC to be the Coordinator of the implementation of the NACs. Besides external factors, there are also several internal factors that have necessitated the push for Sierra Leone to draft anti-corruption strategies. Donor agencies have put pressure and resources on the government to address corruption. The call for budgetary support from donor institutions has in turn also resulted in the demand for measures to mitigate fiduciary risks.

The first among several factors is the state of Sierra Leone's economy that was hit by the twin shocks of plummeting commodity prices in the world market and the Ebola Viral Disease. The various support provided by the international community as a recovery package for these crises exposed how corruption, dubbed as "crony capitalism," deeply affected the Sierra Leone economy. It sparked political tensions and regime change in the country. It likely paved the way to political freedom and opened the door to anti-corruption as an agenda of political discourse. The second factor is the series of corruption scandals, which exposed the past regime in the media. Sierra Leone's political transition and economic liberalisation provided opportunities for new forms of corruption and saw an *intensification of corruption*, i.e., high-stake corruption occurring at higher places of leadership.

Corruption in Sierra Leone has also been attributed to both "flawed structures in the political economy" and the lure of "economic incentives between principals and agents, both "exacerbated by social and cultural norms." The development of the National Anti-corruption Strategy provides a framework for corruption risk assessments and multi-stakeholder consultations to be acknowledged as possible ways through which corruption risks may be identified and addressed.

Process and Structure

In general, in so far as, the National Dialogue and Stakeholders Engagement on Corruption pointed out, corruption is endemic and prevalent in every facet of society, and it has continued unabated. This includes but not limited to public procurement, contracting, abuse of office, and misappropriation of state resources. The malfeasance compromises economic development and the delivery of service in Sierra Leone.

The National Dialogue and Stakeholders Consultation on Corruption was held in February to April 2019 to harness greater national ownership of the fight against corruption and ascertain political will and commitment of the policy makers, implementers and all other stakeholders including the private sector and religious organisation. It was also aimed at attaining advocacy support of the media, civil society groups, and the public at large to garner adequate support in the fight against corruption in Sierra Leone through acknowledging the depth and negative consequences of corruption but most importantly taking ownership in seeking solutions and together combating and minimising this scourge. In the National Dialogue and Stakeholders Consultation on Corruption, Leadership from all Sectors of Society pledged commitment and support to fight corruption in Sierra Leone. This commitment translates into a multifaceted approach in the fight against corruption.

Project Methodology

The crafting of the NACS benefitted from a variety of approaches. To procure the support of relevant stakeholders in the development of the NACS and related activities, broad confidence-building and partnership-fostering measures were undertaken. The members of the Technical Expert Team (TET) were drawn from government, anti-corruption agencies, civil society, private sector, media, other key accountability institutions, experts, and development partners. The NACS project team undertook an extensive consultation exercise. The design of the NACS profited from the consultative and interactive approach. To solicit the support of pertinent stakeholders in the development of the NACS and its implementation action plan, large confidence building, and ownership fostering measures were undertaken. These included consultation with government, MDAs, Councils and other public institution, private sectors, CSOs, and the general public.

However, to enhance the participation of all targeted participants, the following main methods of the consultation were used; critical informant interview, FGD, one-on-one interviews, and district town hall meetings.

The team met more than a thousand people, representing different arms of Government, the private sector, religious organisation, and civil society, ranging from Ministers and senior bureaucrats to slum dwellers, in several meetings, twenty-eight workshops and eighteen focus groups in Freetown and, Provincial and District levels. Discussions were held with the stakeholders on their views about corruption and how it might be tackled. The response was overwhelming, and the consultative methodology was strongly endorsed by those consulted. The team and the NACS unit of the ACC are grateful to all stakeholders, particularly the President, for their support, which made the consultation process possible.

Corruption Defined

For the strategy, it is essential to establish a common understanding of what constitutes corruption and what corrupt activities are covered to focus on research and target the strategy effectively.

Various terminologies are used to describe Corruption, including Rent Seeking, Rent Extraction, dishonesty, dishonest dealing, lawbreaking, delinquency, etc. In the Framework, the use of the term Corruption encompasses a broad range of Transparency International (TI) definition of Corruption— 'abuse of entrusted power for private gains. The noun corruption comes from Latin com, meaning "with, together," an umpire, meaning "to break."

Corruption - related criminal acts connote bribery, trading in influence, graft, other criminal acts committed in the pursuit of private or additional personal advantage in the public & private administrative sectors or by providing public services, namely the abuse of office or exceeding one's authority, abuse of one's power, tampering with official records and measuring devices, fraud, misappropriation or embezzlement of property, disclosure of an official secret, disclosure of a

commercial secret, misrepresentation of information about income, profit or property, legitimisation of the proceeds and property of crime, interference with the activities of a public servant or a person discharging public administration functions, or other criminal acts, if these acts are committed with the aim of seeking or demanding a bribe, offering a bribe, or concealing or covering up the act of taking or offering a bribe.

What constitutes 'corruption' in Sierra Leone? This is particularly true concerning the culture of gift-giving and patronage systems. The risks come from traditional cultural or familial factors where people pay 'bora' and 'famao' to chiefs or traditional leaders.

Extent of Corruption

The stakeholder consultation confirmed what appears to be a consensus among Sierra Leoneans: corruption is all-pervasive and deeply entrenched, and demands a robust strategy to secure long term, sustainable behavioural change. Stakeholders were firm of the view that few aspects of life are untouched by one or more forms of corruption, if not by financial corruption, then by abuse of office or misuse of privileges. Corruption is mostly socially accepted as a norm and regarded as inevitable. Many people do not understand the damage corruption does to the national economic, social, and cultural fabrics of society. Even if they do, they may have no alternative but to engage or collude in corrupt activities. Furthermore, there is little evidence that people feel guilty about their role in corruption.

Prevalence and cost of Corruption

In terms of grand or mega corruption, stakeholders perceived the scale of corruption to be highest in political corruption, development projects, procurement (including the public-sector corporations) and the bank loans write-off. It is difficult to determine the value or frequency of such corruption.

Stakeholders were more concerned about petty and middling corruption: the consensus was that there is hardly an arm of government which does not suffer acutely from corruption.

Causes of Corruption

The challenge is to understand why, when faced with temptation, officials engage in corruption, and why the public often colludes. At the individual level, corruption results from need or greed combined with opportunity, when there is a deep fear of detection and punishment. The need or greed element of corruption must be understood in its broader context by which the system fails to provide a viable alternative to corruption. Key factors include:

- a) Economic: Inadequate and delayed payment of pensions and provision of public service, plus large families; Delay in budget allocation to MDAs and Councils creates room for corruption; Lack of digitized system to manage and monitor strategic information on procurement, customs, Human Resource, Payments, and contracts expose the country to corruption.
- b) Social/cultural: Conflict between demands of modern bureaucracy and demands of family, ethnic and other ties; social pressures for ostentatious demonstration of wealth and to provide for one's children; Most religious organisations and houses have lost the moral ground of integrity and accountability, and that has contributed immensely to the acceptance of corrupt practices across the country. A large part of Sierra Leone's population is religious and see their religious leaders as examples.
- c) Developmental: Low rates of literacy, social empowerment, and opportunities for self-improvement; inequitable distribution of wealth and economic growth;
- d) Political: the local government power structure at the rural level; low levels of political competition; political instability, and arbitrary and selective implementation and enforcement of laws particularly laws on corruption prevention, as well as government ethics and integrity standards, have weakened institutions; with poor example set by politicians; Political interference and influence undermine the efficiency of public institutions in dispensing their duties; Lack of proper background check of most heads of public institutions and politicians undermines the integrity of institutions and the state.
- e) Legal and judicial: Justice is inaccessible, slow and selective, encouraging contempt for the law and an attitude of "everyone for themselves"
- f) Governance- over-centralisation –with all decisions and financial responsibility largely controlled at the central (Freetown). Results in cronyism, 'lay belly' to have access to the required resources.

Audience Timeframe

National Anti-Corruption Strategies (NACS) and action plans are strategic tools developed to mainstream and prioritise measures and reforms to fight corruption in Sierra Leone. The Framework is directed at all stakeholders- public services, private sector, religious organisations, civil society organisations, media, development partners, and the citizens of Sierra Leone.

The National Anti-Corruption strategy (2019-2023) seeks to develop and implement mechanisms aimed to improve the governance of religious organisations, public institutions and to remove corruption related factors inhibiting their accessibility and capacity to deliver quality services to Sierra Leoneans. At the level of the private sector and society as a whole, the Strategy seeks to promote the establishment of ethical standards where they do not exist, and the improved

enforcement of such standards where they exist. The Strategy promotes ethical orientation for improved personal ethics and ethical conduct in nation-building, which will guide citizens.

Lessons Learnt from Previous Strategies

Overall, these various anti-corruption drives, and initiatives failed for two reasons.

The Political Will and capacity to tackle the problem have been lacking within the political elite. And, all previous reviews merely put on paper their findings and views together with a set of recommendations on what they believed should be done to address the issues. No programmatic design for implementation was included. Thus, they remained just recommendations.

Nevertheless, these past efforts do have one use: they serve as an essential lesson for the NACS project. Their failure emphasizes how imperative it is to secure ownership and commitment from those to be charged with the responsibility for the execution of the strategy; to obtain the broadest possible involvement from stakeholders from across the national ecosystem.

Corruption in the Global Context

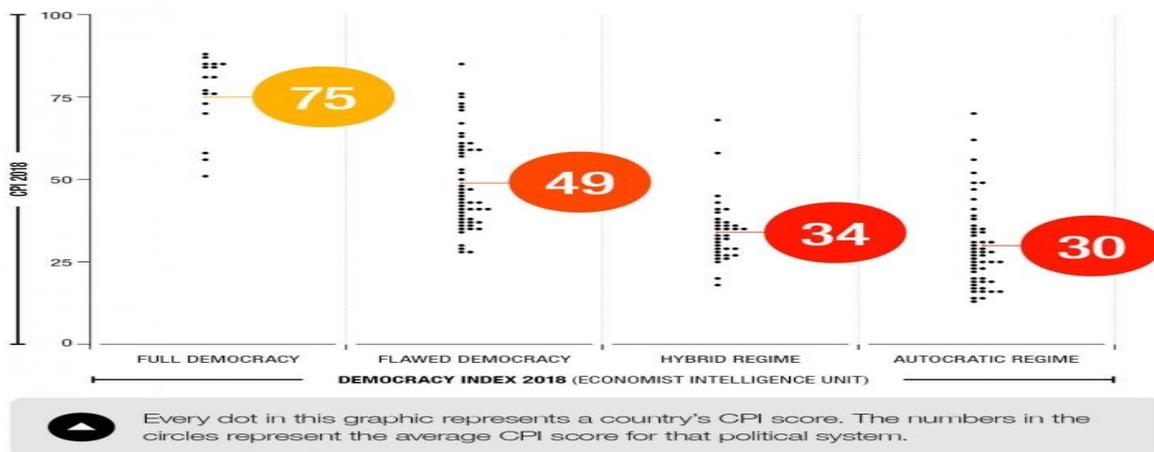
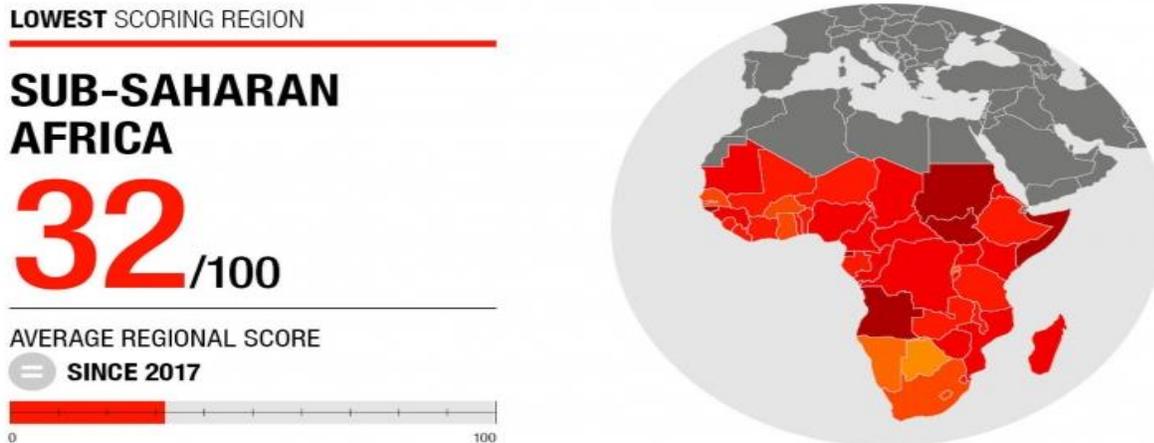
In 2003, member states came together to sign the United Nations Convention against Corruption (UNCAC) which came into force in 2005. The aim was to tackle the growing threat that corruption has become to all nations. In spite of the existence and active implementation of the UNCAC, the ECOWAS Protocol on the Fight against Corruption (2001) and eleven years after the entry into force of the African Union Convention on Preventing and Combating Corruption (AUCPCC), the problem of corruption continues to be pervasive and destructive to member states.

From the African perspective, progress has been made in the fight against corruption in Africa, but significant work still has to be done. To highlight this point, the African Union (AU) designated 2018 as the year for "winning the fight against corruption." The AU is committed to fighting this problem; it signed several treaties aimed at ensuring democracy, the rule of law and good governance. But much more needs to be done. Corruption continues to harm Africa, hampering democracy, development, and the ability to bring people out of poverty. The continent ranks lowest amongst global regions in the (CPI)—TI ranking of 180 countries by their perceived levels of public sector corruption. Countries in Africa average 32 out of 100 in their CPI scores and six out of the bottom ten countries are African. The impact of corruption cannot be underestimated. Roughly 43 percent of Africans are living in poverty, while over US\$ 50 billion worth of stolen assets flows out of Africa every year. Those are much-needed resources that could be used to invest in jobs and social services, where additional resources are needed most.

Transparency International Corruption Perception Index (CPI) 2018

The index, which ranks 180 countries and territories by their perceived levels of public sector corruption according to experts and businesspeople, uses a scale of zero to 100, where zero is highly corrupt, and 100 is very clean. More than two-thirds of countries score below 50 on this year's CPI, with an average score of just 43.

While there are exceptions, the data shows that despite some progress, most countries are failing to make serious inroads against corruption.



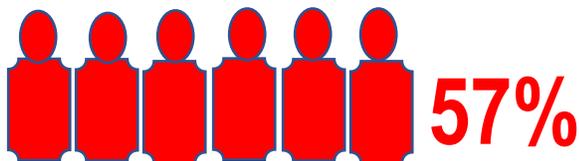
Source: TI

Sierra Leone exemplifies this trend with Sierra Leone Score **30/100** and Rank 129/180. As the Chair of TI, **Delia Ferreira Rubio** put it 'Corruption is much more likely to flourish where democratic foundations are weak and, as we have seen in many countries, where undemocratic and populist politicians can use it to their advantage.'

Transparency International- Global Corruption Barometer 2017

Key findings from the ninth edition of Transparency International's Global Corruption Barometer series – the world's largest survey was asking citizens about their direct personal experience of bribery in their daily lives, their perceptions of corruption challenges in their own countries, and their willingness to act against corruption. It reveals that ordinary citizens too often stand on the front line against corruption. They face demands for bribes to see a doctor, find a school place for their children, or file a police complaint. And it is always those who are least able to pay a bribe who suffer most. The results of this latest edition of the survey have been published via a series of regional reports. This summary brings together those reports and covers 119 countries, territories, and regions around the globe. It is based on interviews with 162,136 adults from March 2014 until January 2017, and it identifies the key differences between the regions and key results by place.

TI asked people how well or badly they thought their government was doing at fighting corruption in their country. Around the world, we found that nearly six in ten people thought that their government was doing poorly, while only three in ten thought that their government was doing well.



SAY THEIR GOVERNMENT IS DOING BADLY



SAY THEIR GOVERNMENT IS DOING WELL

On the percentage of people who paid a bribe when they came into contact with a public service in the last 12 months, the survey reported that Sierra Leone scores 40%-50% range alongside Nigeria, Egypt, Cameroon, Morocco, Sudan, etc.

The World Bank Group's Worldwide Governance Indicators

The Worldwide Governance Indicators (WGI) project reports aggregate and individual governance indicators for over 200 countries and territories over the period 1996–2017, for six dimensions of governance:

- Voice and Accountability
- Political Stability and Absence of Violence
- Government Effectiveness
- Regulatory Quality
- Rule of Law
- Control of Corruption

These aggregate indicators combine the views of a large number of enterprises, citizen, and expert survey respondents in industrial and developing countries. They are based on over 30 individual data sources produced by a variety of survey institutes, think tanks, non-governmental organizations, international organizations, and private sector firms. On the 21st September 2018, the World Bank Group released the 2018 update of the Worldwide Governance Indicators (WGI) on individual and aggregate governance indicators for over 200 countries and territories.

Sierra Leone Scored **31.25%** on control of Corruption which reflects perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as "capture" of the state by elites and private interests.

Corruption in National Context (using PESTLE Analysis)

Corruption continues to exact a heavy toll on Sierra Leone's economy, society, politics, and retarding national development. PESTLE analysis enables the exposure of the different dimensions of the problem to an all-encompassing diagnostic tool.

Political Factors

The level of political will that exists is not enough to engender political climate conducive to effectively preventing and fighting corruption. Political interference largely compromises investigations of corruption cases. This hinders the smooth progress in combating corruption as it leads to unfair administration of justice. The lack of political maturity and politicized public service make those responsible vulnerable to misuse, and delivery of service very poor and biased.

The most important element of an effective anti-corruption strategy is "political will." Without a political will or buy-in from the highest level of government, the fight against corruption will remain a fallacy. Political will by government involves adequate budgetary allocation to Anti-corruption Commission; enactment of anti-corruption laws; support to the investigation of corruption cases especially High Profile Corruption Cases (HPCCs); true independence and freedom from political interference of Anti-Corruption Commission; zero tolerance across board towards the fight against corruption, it should not be a case of double standards or preferential treatment of some certain class of persons. Everyone should be and should be seen as equal before the law. Political will must also include the will for the ruling party to hold its members to the same standards of ethics and integrity as members of other political parties and members of various networks and societies of influence. Also, sufficient political will must materialize to credibly ensure that those who assert or attempt to assert inappropriate influence in respect of acts of corruption or integrity/ethics violations will be dealt with appropriately.

Beyond the political will institutions with regulatory mandate most importantly the Political Parties Registration Commission

(PPRC) Act of 2002 and the provision of Financing of **Political Activities** are all initiatives aimed at strengthening accountability within the political space. However, in practice, certain legal solutions proved to be deficient, particularly in terms of obligations of the persons connected to political entities, the use of public resources, and obligations of the competent authorities for the control of the financing of political entities. No external audit of political entities has been carried out until the present day as they are not provided for by the Law as mandatory save for the two big political parties (All Peoples Congress and the Sierra Leone Peoples Party). An additional difficulty in this area makes the lack of necessary capacities of the Commission incompetent for the control of financing activities. Such gaps present a challenge for the level of collaboration required by the ACC to pursue such matters.

The Anti-Corruption Commission (ACC) has achieved significant results in the field of prevention through public engagements and some conviction in the High Courts. The limited success cases hamper these achievements in the appellate courts. However, the issue of conflict of interest, in terms of elimination of the influence of the private interest of the persons performing a public function, has not been regulated properly, which inhibits actions of the ACC. Therefore, it is necessary to specify and provide mechanisms for development, enactment, monitoring, and consistent application of the provisions on the conflict of interest and increase accountability and transparency in actions. In the field of control of property and incomes of public officials, the ACC has faced difficulties related to the verification of accuracy and completeness of property and income reports and to keeping asset declaration register. The main deficiencies in practice are a loosely defined legal term, rights, and obligations of a public official and non-existence of a range of public functions. Furthermore, imprecisely defined powers and duties of the ACC in the control procedure, as well as inadequate cooperation with competent authorities, further complicate the procedure of verification of data in submitted asset declaration forms.

The criminalization of politics, i.e., the use of criminals and musclemen in politics, and the prevalence of confrontational politics has made *political corruption* to be the mother of all corruption in Sierra Leone.

Involvement of the public and civil society organization has a key role in increasing transparency of work and accountability of politicians. Namely, the process of adoption of regulations in the Republic of Sierra Leone, at all levels, is characterized by insufficient involvement of the public, which is the reason why many regulations become an "instrument" of corruption and misuse rather than means of its eradication. The reason for this is, among other things, non-existence of a legal guarantee which would guarantee that public hearings would precede the adoption of regulation and that proposals of the public would be considered. The Republic of Sierra Leone also does not have a regulated lobbying process as a mechanism for affecting interested individuals and groups to adopt regulations and decisions.

Favourable conditions were slowly created for the influence of interests of political entities on their work due to the manner of appointment and removal of directors and the manner of managing public enterprises at all levels of the government. Although requirements for the election of directors are prescribed within the respective Acts of Ministries, Departments, and Agencies, there are no clear criteria on the basis of which a relevant ministry would propose a candidate to the Executive and on the basis of which the President would make the final selection of the candidates who meet all prescribed requirements. Therefore, selection, removal, and the method of evaluation of work of directors are still hazardous processes and subject to abuse and corruption.

Although public goods are, to obtain a private gain, traded at all levels of the government, the issue of anti-corruption actions is almost entirely left out and forgotten by political decision-makers at the territorial autonomy and local self-government levels. No serious local anti-corruption action plan, except in rare cases, has been adopted and implemented. This would ensure transparent work of territorial autonomy, and local self-government authorities, as well as of regional and local public authorities, the budgeting process, and creating and spending budgetary funds, as well as an adequate response of the civil society and media to corruption challenges. The potential of the corruption problem at these levels has increased and will continue to grow with the non- implementation of the decentralisation process.

Economic Factors

There is a high level of unemployment in Sierra Leone, especially among the youths, and this leads to poverty levels that end up creating an environment prone to corruption. Moreover, the government has not allocated sufficient resources towards supporting economic activity and the fight against corruption in Sierra Leone, as a consequence, socio-economic factors lead to chronic under development.

Sierra Leone has a cash-based economy, an environment prone to financial crimes, including corruption. Tracking of corruption transactions in a cash-based economy can be tricky and cumbersome. High inflation and interest rate discourage savings and erode purchasing power, and when this is experienced by a competitive individual who has peer pressure, it can easily create a temptation for corruption in an environment where controls are weak.

The new Public Financial Management (PFM) Act 2016 was enacted by Parliament on the 31st of May 2016, replacing the Government Budgeting and Accountability Act (GBBA) 2005. The accompanying Public Financial Management Regulations were also enacted by Parliament in 2017. The PFM Act, 2016 requires a new Government to prepare a Fiscal Strategy Statement in which it should indicate its fiscal objectives for the next five years. In particular, section 21 (1) of the PFM Act, 2016 states that "When an election to the Office of the President of the Republic of Sierra Leone has taken place, the new Cabinet shall, based on the principles of responsible financial management, specify in its first Fiscal

Strategy Statement, the fiscal objectives to be applied in the next five years ".Hence, the preparation of the Fiscal Strategy Statement (FSS) for 2019 to 2023 complies with Section 21(1) of the Public Financial Management (PFM Act), 2016. The FSS should be submitted to Cabinet for approval and subsequently laid in Parliament for information only.

In terms of public revenue, the Government plans on improving domestic revenue collection from 12.6 percent of GDP in 2017 to 14.3 percent of GDP in 2018 and further to 20 percent of GDP in 2023. It is important to note that the potential revenue to be generated based on the macroeconomic fundamentals will amount to 15.9 percent of GDP by 2023 from 12.6 percent of GDP in 2017.

Reforms undertaken by the National Revenue Authority if decentralised and adequately monitored enforced and sustained could serve as a deterrent to opportunities for corruption. Sierra Leone Tax Administration implemented by the National Revenue Authority started working more transparently with the establishment of reform of both domestic tax revenue and the introduction of ASYCUDA, which is a computerised customs management system which covers most foreign trade procedures. The system handles manifests and customs declarations, accounting procedures, and transit and suspense procedures. It generates trade data that can be used for statistical economic analysis. The system is still at its initial stage, and there is enough space for further building of capacities, technical requirements, education of employees, as well as for carrying out campaigns for raising awareness of citizens about the existence and operation of this system. Also, no system with a unique tax identification number for linking records on persons, property, and incomes kept in the Republic of Sierra Leone has been established. This makes it difficult to track changes and control the information reported in the period before the reform of the tax system.

The National Revenue Authority (NRA) embarked on far-reaching reform measures and investment in capacity. That is why the Domestic Tax Department (DTD) has made some progress in the automation and computerization of management, tax, and customs procedures. It has created the privilege for taxpayers to declare their tax obligation, lodge their declaration using the Direct Trader Input (DTI) system at customs and jointly operating the one-stop shop for the issuance of Taxpayer Identification Number (TIN) and business registration. The Authority has so far contributed immensely to the country's ease in doing business by reducing the number of taxes (through the consolidation of GST) and the time it takes to comply. Its role in trade facilitation is glaring; for which the Authority is championing moves towards efficiency in service delivery by all stakeholders at customs, while at the same time contributing to improving port security.

The Customs Administration is expected to take significant systemic measures in this field: drafting the Anti-Corruption policies at the level of the Customs Administration, introducing video surveillance and license plate reader system in each organization unit carrying out customs service duties.

In terms of public expenditure, the Government seeks to maintain Government expenditure at an average of 23.5% of GDP from 2018 to 2023. An important strategy to keep public expenditures at sustainable levels is to rationalise the Government wage bill. The aim is to gradually clean the Government payroll to keep it at the sustainable level of 6.0 percent of GDP from 6.7 percent of GDP in 2018. In nominal terms, the Government Wage bill will increase from Le1.9trillion in 2017 to Le2.1trillion in 2018 to Le3.03 trillion in 2023 as the economy grows.

Control and accountability are particularly important when it comes to the management of public resources or funds allocated by the citizens for effective and efficient management of public affairs by general interests. Adherence to these standards is still not satisfactory in the Republic of Sierra Leone. The public is still not thoroughly and understandably, familiarized with the processes of planning and spending of budgetary funds. Laws on the budget for a specific fiscal year are mostly adopted in a short period.

In terms of monetary policy, The Bank of Sierra Leone (BSL) maintained a tight monetary policy stance in 2017 with the monetary policy rate being raised cumulatively by 350 basis points to 14.5 percent in December 2017 from 11 percent in December 2016. The maintenance of tight monetary policy stance and the stability in the exchange rate contributed in part to the downward trend in headline inflation observed after the first quarter of 2018. Inflationary pressures re-emerged in March 2018 as inflation rose to 14.9 percent and subsequently increased to 17 percent in July and 18.2 percent in August, attributable to the increased demand for goods and services in the period leading to and during the month of Ramadan as well as pressure on the exchange rate. In response, the Monetary Policy Committee tightened monetary policy further by increasing the policy rate by a cumulative 200 basis points to 16.5 percent in June 2018 from 14.5 percent in December 2017. The decision was motivated by the committee's assessment of the short-term outlook for inflation, which suggested that upside risks to inflation were prominent in the months ahead.

In terms of sanctioning policy, so far, there has been no efficient sanctioning of malpractice in public procurements and adequate cooperation between the National Public Procurement Authority, the Directorate of Public Procurement at the Ministry of Finance, the ACC and other competent institutions. Although some progress has been achieved, significant improvement is required in the regulatory plan, in the field of transparency of procedures, reduction of discretionary powers of directors of the bodies conducting procurement, strengthening control over public procurement procedures, sanctions, professionalism, building capacities and integrities of the persons responsible for public procurements. The carrying out of monitoring and control of public procurement procedures, the procurement mechanisms aimed at preventing the conclusion of agreements based on unjustified or irregular execution of the public procurement procedure, internal acts that would precisely govern the public procurement procedure, etc.

In terms of public internal control and external Audit, the concept of the Public Internal Control (PIC) as a comprehensive and effective system, to ensure financial management, control, internal audits and reporting on the use of

public funds, including Development Partners' funds. This concept applies equally to all budgetary beneficiaries (direct or indirect), and other users (local self-government, public companies, etc.). Therefore, it is essential to ensure its functional and operational independence and mandatory application. Another obstacle represents the fact that the existing systematized positions for internal auditors are not fully populated due to the lack of highly educated staff, low salaries, inadequacy of systematized professions in terms of the workload and complexity of work and competition of the private sector. It was also noticed that senior managers in the public sector are not sufficiently familiar with their role and responsibilities in establishing the internal control system, as well as with the role of an internal auditor in their organization. Managerial accountability and financial management and control are still understood in their literal meaning. The financial management and control are focused on the legality and regularity of financial transactions, without explicit consideration of the issue of cost-effectiveness, efficiency, and appropriateness.

There is no doubt that progress has been made in the field of **external audit** under the auspices of the Audit Service Sierra Leone (ASSL). The ASSL continues to build its capacities gradually, and new auditors are being employed.

The ASSL is still in the process of institutional construction and also because not all conditions for its successful operation are provided timeously. The ASSL has insufficient resources, and the number of audit subjects is still somewhat limited. The building of capacities for conducting the audit of appropriacy is still underway.

The private sector and commercial enterprise have been stifled by corruption. Unnecessary, obstructive, and, above all, coercive bureaucracy impedes healthy businesses. Business depends crucially on operating in a climate where contracts can be made and enforced, and where risks can be predicted with confidence. The excessively intrusive public sector further reduces incentives for investment. The legal system affords little or no protection to small and medium-sized businesses with a crippling effect on private sector development. This reduces revenue for public purposes, encourages massive wastes and increases costs to consumers.

Social Factors

The public generally acknowledges the existence of corruption but appears to have resigned themselves to fate because they perceive corruption to have no direct victim. Members of society see it as the responsibility of the Government to fight against corruption without identifying the role of each and the society at large.

The healthcare system provides an example. Sierra Leone's Health Care System shows that the risk of corruption may exist in the field of public procurement, additional work of physicians, spending funds (from the budget or grants), acceptance of gifts, conflict of interest, waiting lists, provision of non-standard services, as well as in the relation between pharmaceutical companies and doctors, and employment of health care workers and associates. The causes of these

risks are primarily gaps in systemic laws. Therefore, it is conducive for cases of abuse that there are no clear procedures and lists of non-standard services; criteria and procedures for performing additional work whose incomes in cash are not returned to the budget but are allocated to health care institutions and their employees (existence of the so-called “own incomes”); loosely regulated relation position of the pharmaceutical industry in terms of the medical practice and training of employees in the health care system; imprecisely regulated legal conditions under which health care workers and associates employed in public institutions can provide health care services in private institutions, etc. The current practice shows that there is no adequate accountability and transparency in terms of adoption of decisions about waiting lists, access to personal information or specific services, etc.

Again, the educational sector has not been immune. Risks of corruption noticed in the educational sector are mostly associated with insufficient transparency of several processes taking place within educational institutions, as well as great discretionary powers in decision-making. Risks of corruption are mainly related to discretionary powers of directors in terms of employment of personnel, public procurement procedures, organization of trips, renting of school facilities, sex for grades, etc. At this point, this is an economic activity in schools which may pose a threat to integrity. The absence of effective control represents a significant problem because mechanisms for responding to different types of irregularities do not exist. The lack of control is also connected to the issues with the inspection whose work and contents of decisions may be influenced by the ministry competent for education. The issue of private higher education institutions is insufficiently regulated, considering that adequate quality control standards and mechanisms are not prescribed, which creates a possibility for abuse within these educational systems.

The Government of Sierra Leone recognizes that for effective governance to take place there is need to engage the civil society in addressing the challenges of implementation of human rights and access to justice principles, as well as anti-corruption initiatives. There are significant numbers of Civil Society Organizations (CSOs) involved in advocacy for good governance, and anti-corruption initiatives. The Media as part of the broader civil society is seen as playing a key role in delivering awareness on human rights and access to justice and as an integral and essential part of the democratic process while limited activities have been heard or perceived in anti-corruption programs in Sierra Leone.

Civil society Organisations (CSOs) are increasingly important agents for promoting good governance like transparency, effectiveness, openness, responsiveness, and accountability. Civil society can help further and improve good governance through its policy analysis and advocacy in Sierra Leone. In this respect, civil society in Sierra Leone has a long way to go to engage in pragmatic and country-specific roles for a robust enabling environment within the scope of civic movements such as to protest and to sit at the table with governments to dialogue and contribute to anti-corruption policy outcomes.

Corruption within the **media** prevents objective informing and public supervision over social activities. The importance of these issues can be seen in the fact that they are recognized as critical issues in this Strategy. In the sphere of journalist protection, less progress has been achieved especially with criminal libel law in force which criminalizes the criminal offenses of "Slander," 'libel' and "Unauthorized public commentary on judicial proceedings." International recommendations and conventions have recognized pluralism and media diversity as crucial to the functioning of a democratic society. The Strategy calls for media transparency, which would allow the public to form its own opinion on the value it ought to give to the information, ideas, and opinions spread by the media. Also, the public concern was expressed over the Government's attempt to control the work of the media and drew attention to the concentration of ownership and the lack of transparency in the media ownership structure. From the perspective of media transparency, such a tendency could cause a dual problem. On the one hand, it is more complicated or it could become more difficult for the public to find out who owns the media it follows and thus, in light of the owners' identities and motives, as well as those who may be behind them, form an opinion on the value of the information, opinions, and ideas that media broadcasts or spreads. On the other hand, it complicates the work of the Independent Media Commission (IMC) which is responsible for the application of provisions which refer to the monitoring of illicit media concentration, especially in the procedure of broadcasting permits being issued for radio and television services.

Technological Factors

The technological advancement of Sierra Leone and the world at large puts the country in a vulnerable position as it lags in terms of both technological infrastructure and skills. Most economic offenses today accompany international transfer payments, and there are also instances of cybercrime, which require very advanced technological equipment and skills to detect and redress. There is a generally slow rate of development in technological infrastructure, and this opens an opportunity for technologically facilitated corruption to increase unabated.

The President has established the Directorate of Science, Technology, and Innovation; a new initiative. The idea behind the creation is not only to foster national growth through science and technology but also to ensure that the country moves towards the global trend of digital governance. This would substantially reduce human contact and the need for corruption and bribery to persist. Already, the directorate has established a working Memorandum of Understanding with the Anti-Corruption Commission to provide relevant information to the ACC, which will be useful in the fight against corruption. No doubt, as technology progresses globally, so too are the schemes of perpetrators of corruption. Therefore, the tools of technology must also be up to date to combat high-level, sophisticated corruption.

Legal Factors

Sierra Leone's first Anti-Corruption law was passed in 2000. It was largely an ineffective legal framework since the Anti-Corruption Commission was not made independent of the Executive arm of Government. A new Anti-Corruption law was passed in 2008 making the commission's prosecutorial mandate independent and more effective. However, a separate anti-corruption court system with expert judges on corruption was not established and only in February 2019, has an anti-corruption division of the High Court been created with judges assigned to sit on anti-corruption matters.

A judicial abuse of office is still rife, and anti-corruption trials are unnecessarily protracted and their decisions, more often than do not match the seriousness of the offense. Pecuniary punishments/fines under the current Anti-Corruption law are a mere fraction of usually the total quantum of monies for which trials are done.

Achieving **independence of judiciary** means that the judiciary budget is entirely separate from the executive budget, which is not the case now. The Judiciary, like any MDAs, are subject to the budgetary process and allocation.

In the field of setting criteria for the selection of a person for the judicial function, the Judicial and Legal Service Commission should be strengthened and given the required autonomy, which will subsequently result in future holders of judicial functions selected based on clearly laid down criteria. It should also have a key role in the application of professional standards and the merit principle in the judiciary. However, an adequate merit-based career system for judges and prosecutors is yet to be fully developed.

There is a need to review and harmonise provisions of the various acts aimed at enhancing accountability and transparency; the extant Anti-Corruption Act 2008 and other anti-corruption related laws such as the Procurement Act 2016 and its Rules; the Public Financial Management Act 2016; the Financial Management Rules 2007; the Anti-Money Laundering and Combating of Financing of Terrorism Act 2012. These laws need to be reviewed from time to time for the fight against corruption not to be undermined by weaknesses of the laws. There is a proposed amendment to the current Anti-Corruption currently before parliament which proposes among other things the power for judges to order full restitution of misappropriated monies in addition to pecuniary or custodial sentences; provision of clear power and mandate of the ACC to enter into settlements arrangement; and the power of the ACC to temporarily suspend illegal contracts. While these proposals are welcoming, they are not the sort of comprehensive amendments that are needed to elevate the law governing corruption to meet with the growing need to thoroughly minimise or eradicate corruption in Sierra Leone.

Also, there is a proposed regulation to govern asset declaration and whistle-blower protection. **Protection of whistle-blowers** is regulated by some scanty provisions of laws (the ACC Act 2008, Right to Access Information Act 2013). Nevertheless, such protection is limited in its scope for several reasons (a person enjoying protection, the extent of protection, cases in which protection is provided, non-regulated field of sanctions for those who do retaliate, or indemnity or rewarding of whistle-blowers), therefore, it is necessary to have a complete legal framework in this field with enactment

of a particular law dealing with protection of persons making disclosures in both, public and private sector, in public interest. Also, it is necessary to gain the trust of the public and persons who are potential whistle-blowers, that the adopted law will guarantee full protection of these persons.

The criminal offense of “illicit enrichment” defined in the UNCAC has not been prescribed yet.

Financial investigation is mainly conducted after a criminal charge has been filed, during investigation. Delay of financial investigation increases the risk of taking the property out of the country.

What is also noted is legally unregulated work of court experts, who often use their title to work for banks and companies as appraisers. This creates an opportunity for different forms of abuse resulting from such a legally unregulated situation.

The mechanisms for the prevention and elimination of **conflict of interest** in Sierra Leone needs to be improved. The ACC Act 2008 does not regulate the issue of conflict of interest that refers only to the officials performing public functions. Although the Corporate Affairs Commission Governance Codes of Conduct highlights what are the forms of conflicts of interest, means of dealing with them, but does not adequately regulate this issue. Therefore, it is necessary to create a unique legal framework which will generate the same mechanisms for the prevention and elimination of conflict of interest for all employees in the public sector. The starting point is carrying out the feasibility study to determine the most suitable model for control and defining roles of managers, internal auditors, Tax Administration, the Anti-Corruption Agency, and other public and private authorities.

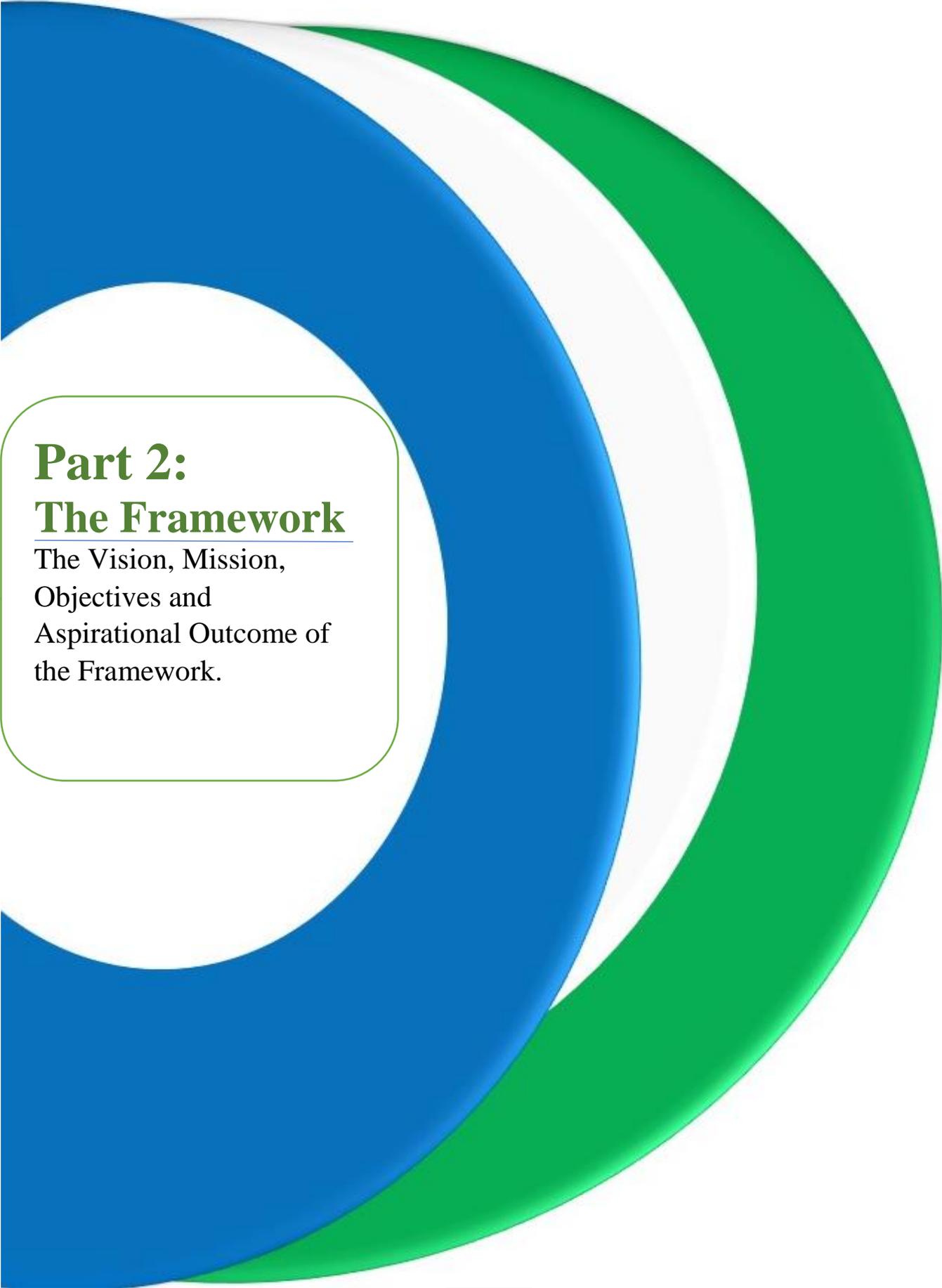
One of the most important drivers of corruption is the lack of adequate access to reliably official and updated versions of laws/regulations by all officials, the courts, and citizens. Another important impediment to corruption is removing corruption risks in the law-making process. Currently, Sierra Leone lacks a law that contains mandatory and legally enforceable minimum standards for procedural transparency and integrity in the important processes of law drafting, legal quality control, reviews/consultations, and deliberation. These minimum standards must be subject to legally enforceable systems to ensure full compliance of each law, regulation, and other similar legal instruments.

Environmental Factors

Sierra Leone is endowed with different natural resources in its ecological space ranging from the diversity of minerals, e.g., diamonds of high quality, abundant clean and potable water, etc. These comprise the necessary resources for improved economic growth and development. However, Inadequate Environmental Management Expertise and rent-seeking behaviour and attitude of responsible officers' lead to weak enforcement of environmental laws and as such industrial activities cause environmental degradation, unnecessary health risks and high risk of extinction for flora and

fauna due to failure to regulate investors. Corruption does not only inhibit the growth and development of the human resource of a nation, but it also contributes to the destruction of the environment. When harmful mining and other environment-related contracts are illicitly negotiated and executed, the environment, in turn, suffers from the aftermath. It is therefore essential that an anti-corruption policy in addition to environmental impact assessment be submitted to EPA (which will forward the former to the ACC) by any company or entity proposing to commence some activity which would have an impact of the environment.

The EPA process itself must trigger a publicly transparent permitting system leading to a mandatory Environmental and Social Risk Management Plan (ESRMP) that should be part of the documentation submitted for approval of any extractive endeavour with strict monitoring standards and compliance enforcement.



Part 2:

The Framework

The Vision, Mission,
Objectives and
Aspirational Outcome of
the Framework.



PART TWO – THE FRAMEWORK

The rationale for a National Anti-Corruption Strategy

The National Anti-Corruption Strategy is intended to serve as a guide for Government, the private and business sector and civil society organisations, to help coordinate and support their efforts to reduce corruption. The strategy, therefore, provides a set of strategic pillars around which sectors, organisations, and other forums within these sectors can direct an attempt to align their work. It also provides a tool for citizens and others to monitor Sierra Leone's progress in achieving a substantial reduction in corruption in the country.

The National Anti-Corruption Strategy outlined below include eight strategic themes or pillars under which organisations and sectors can develop new programmes as well as a standard set of concepts and commitments for reducing corruption. In summary, the rationale of an overarching National Anti-Corruption Strategy is to:

- ✓ Direct energy towards practical mechanisms to reduce corruption and improve ethical practice across sectors and among citizens in Sierra Leone
- ✓ Support coordination of government, business and civil society efforts to reduce corruption and enhance accountability and ethical practice
- ✓ Provide a robust conceptual framework and strategic pillars to guide anti-corruption approaches across sectors in the country
- ✓ Provide a tool for monitoring progress towards a less corrupt society

Vision

Our initiative to combat corruption will contribute towards three long-term outcomes:

- **Delivery on our National Development Plan** and achieving sustainable development goals
- **reduced the threat to our national security**, by promoting zero tolerance for corruption
- **enhanced public confidence, inspire integrity, transparency, accountability and the rule of law**

The vision of the National Anti-Corruption Strategy is thus:

Our Vision

- **Sierra Leone National Anti-corruption strategy aims to confront corruption as a threat to every sphere of national development and embodies a set of principles and initiatives to build an ethical and accountable Republic that promotes zero tolerance for corruption to inspire integrity, transparency, accountability and the rule of law**

Delivering the vision

As we work to deliver the vision, **we will**:

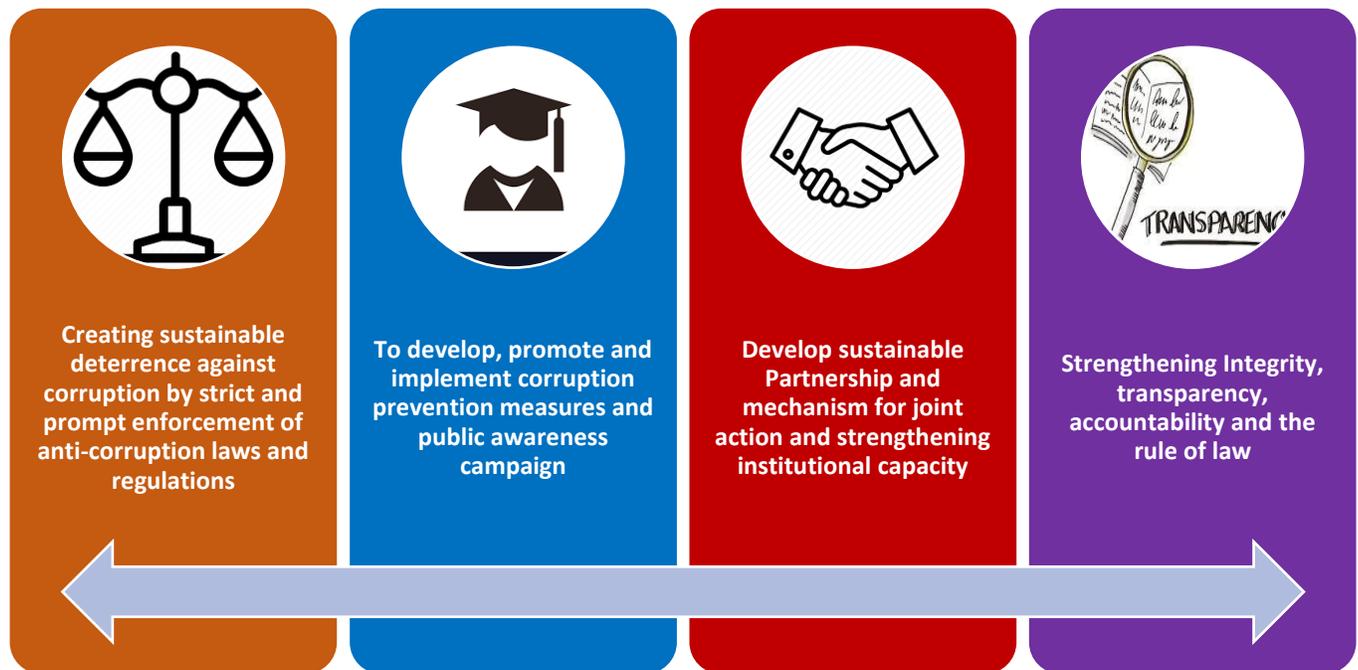
- **Promote, Pursue, and punish** the corrupt. We will strengthen the ability of law enforcement, criminal justice and oversight bodies to disrupt, investigate, and prosecute wrongdoers, including those seeking to move, hide and use the proceeds of corruption, inside and across our borders. In particular, we will focus on transparency, increasing the accessibility of information needed to investigate, prosecute, and increase accountability.
- **Prevent** people from engaging in corruption, including strengthening professional integrity. We will promote professional standards and personal ethical behaviour in both the public and private sectors through training and education.
- **Protect** against corruption, by building open and resilient organisations across the public and private sectors and **reduce** the impact of corruption where it takes place, including redress from injustice caused by corruption.

Mission Statement

To increase citizens' awareness on the values of a corrupt free society and encourage zero tolerance for corruption through civic education, implementation of reforms and a robust legal framework

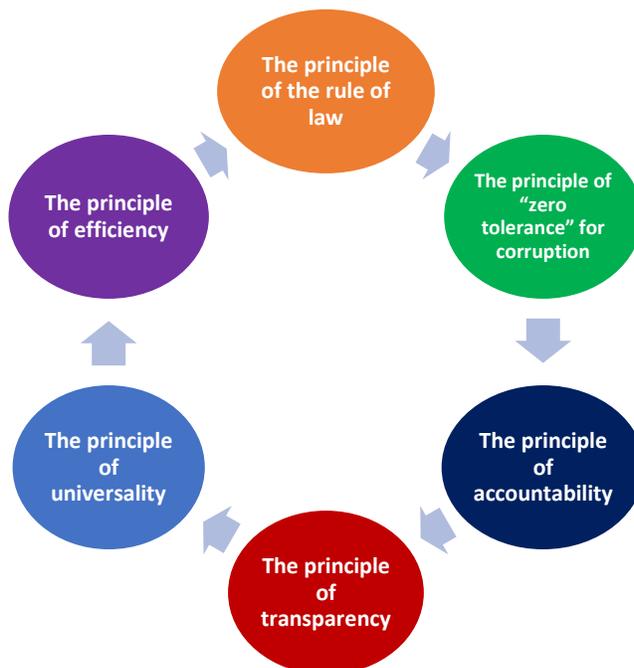
Objectives

The objectives of the National Anti-Corruption Strategy are to:



Principles

In the implementation of this Strategy, authorities and holders of public powers that are involved in the prevention of and fight against corruption, are obliged to perform their duties by the following general principles:



1. **The principle of the rule of law** – A guarantee of the legality of actions, equality before the law and rights of all citizens to legal remedies. The Constitution of the Republic of Sierra Leone, laws and by-laws, as well as ratified international treaties and generally accepted rules of the international law, must be fully and consistently implemented.
2. **The principle of “zero tolerance” for corruption** – Indiscriminate application of the law in all forms of corruption.
3. **The principle of accountability** – An obligation to assume full accountability for creating public policies and their efficient implementation, including implementation of this Strategy and the Action Plan.
4. **The principle of universality of implementation of measures and cooperation of entities** – A duty to implement measures comprehensively and consistently in all fields, and cooperation, as well as to exchange experiences and harmonize actions of relevant entities at all levels of the government with established good practice.
5. **The principle of efficiency** – A duty to usually conduct anti-corruption measures within one's powers, and to conduct ongoing training for the purposes of improving efficiency in the fight against corruption;
6. **The principle of transparency** – A guarantee of publicity in the process of adoption and implementation of decisions, as well as enabling citizens to access information, by the law.

Enablers

Six specific Enablers has been identified that will assist in achieving the Vision of the Framework. Appropriate use of the Enablers will give effect to successful policies, strategies, actions, and services that will support the fight against Corruption.

The **Enablers** comprise:

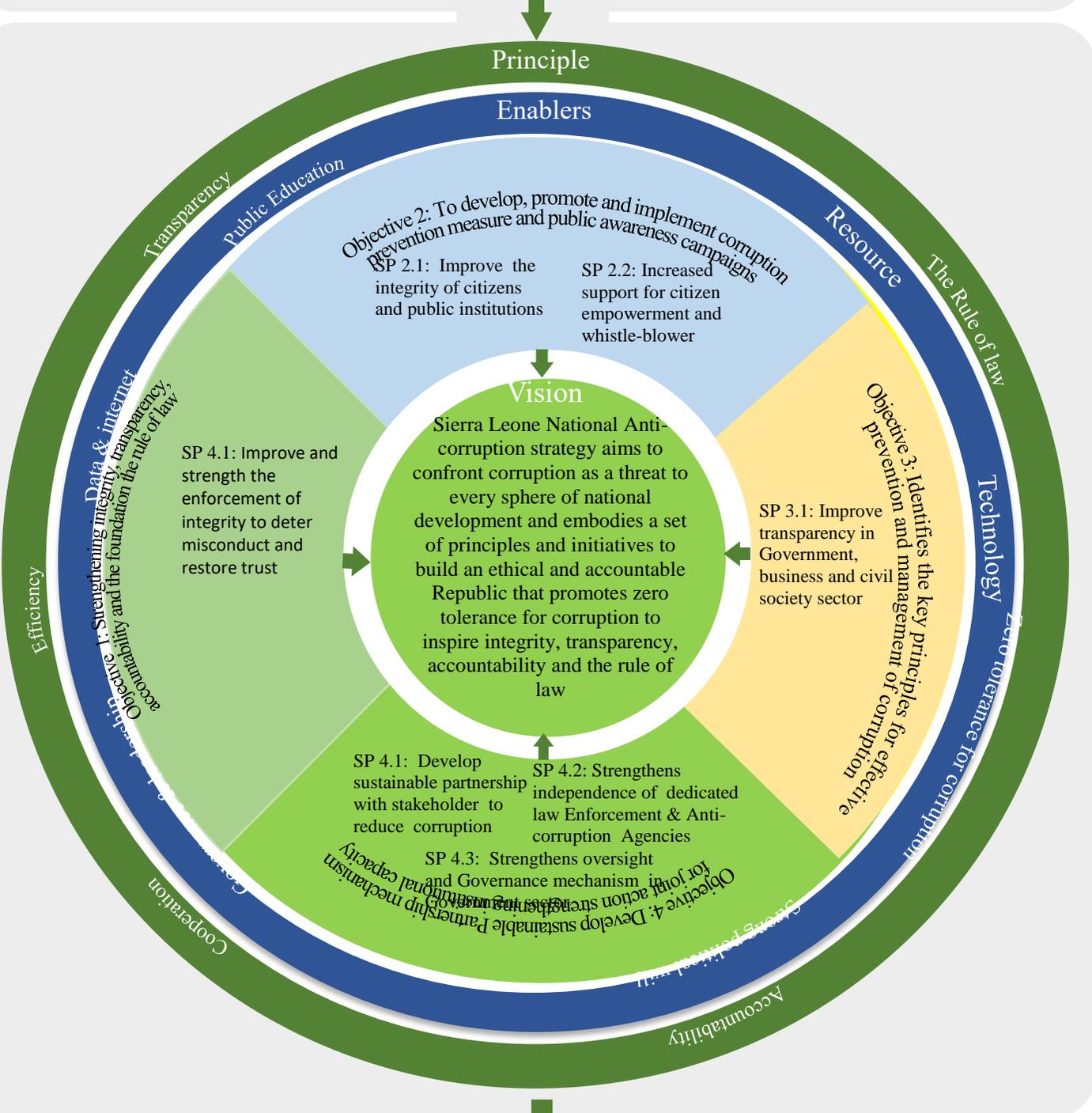
- **Governance and leadership**- supports evidence-based, shared decision-making and encourages collaboration to enhance good governance;
- **Resources**- adequate allocation, appropriate distribution, and efficient use of resources, including funding, to address identified corruption control needs over the long-term.
- **Technology** — supports more useful and accessible anti-corruption prevention and management strategies and offers avenues for new and improved technologically driven initiatives. Computerize all activities involving the delivery of public services on a mission mode. Adoption of technology would reduce direct interface between the citizens and the public officials.
- **Data and information** — the use of consistent, quality data and real-time data sharing enable monitoring and quality improvement to achieve better outcomes.
- **Public Education and Awareness**- to address some of the issues raised in this report, public education and awareness programme should be designed and rolled-out.
- **Robust Political Will**- The Head of state should exhibit and commit to the fight against corruption through providing the necessary support, resources and backing to the Integrity Institutions such as the ACC, Audit Service, the Sierra Leone Police, the Judiciary even if the Corruption fight comes close to the Presidency. This political leadership is expected to cascade to the other Leadership of Government, Religious leaders, private sector leaders and broader political support to steer the overall process and mobilise necessary resources, is an

essential condition of an effective anti-corruption strategy development process. The President committed to supporting this drive during his engagement with the team of experts.

Conceptual framework

Corruption affects and involves the actions of people in the government, business, and civil society sectors. Tackling it will require commitment from all sectors, and interventions to empower citizens to support efforts aimed at reducing corruption. Furthermore, corruption is not simply caused by a few "bad apples." To deal with the systemic factors enabling corruption, it is important to recognise that corruption and, conversely, Behavioural change is supported through changes to the institutions that govern or shape behaviour. Institutions are those structures, processes, and mechanisms that shape people's behaviour in a particular context or community. Examples of relevant institutions are the organisations that govern training, such as schools or universities, workplace or organisational cultures and religions. Therefore, ensuring people know anti-corruption regulations, ethics frameworks, etc., is the first important step towards reducing corruption and supporting ethical practice. It is however, not sufficient.

- Partners**
- . Government (at all level)
 - . Non-Governmental Organisation
 - . Private Sector and industry
 - . Researchers and Academics
 - . Communities
 - . Individuals



The Strategy

- Moves away from a sector-based approach
- Identifies the key principles for effective prevention and management of corruption
- Reinforces a stronger emphasis on coordination across the Integrity institutions
- It acknowledges and builds on work already in place that supports corruption controls
- It complements country-based, national and international policies for corruption
- Accommodates existing and new strategies and policies without changing the responsibility
- Provides flexibility to accommodate future and emerging priorities and allow for an innovative solution for the prevention and management of corruption

National action is required to strengthen Sierra Leone's approach to reducing the impact of corruption. The national approach should be coordinated and needs to accommodate every Sierra Leonean in the fight against corruption.

HOW WE WILL DELIVER THE VISION

Strategic Pillars (SP)

The National Anti-Corruption Strategy is built on the following eight strategic pillars, which are mutually supportive and can deliver the vision:

Pillar 1. Improve and strengthen the enforcement of integrity to deter misconduct and restore trust

Pillar 2. Improve transparency in Government, business and civil society sector

Pillar 3. Improve the integrity of citizens and public institutions to ensure fair, effective and efficient use of resources

Pillar 4. Support citizen empowerment in the fight against corruption, including increased support for whistleblowers

Pillar 5. Develop a sustainable partnership with stakeholders to reduce corruption and improve the integrity management

Pillar 6. Strengthen oversight and governance mechanism in the government sector

Pillar 7. Strengthen the resourcing, cooperation, and independence of dedicated anti-corruption agencies

Pillar 8. Build specific programmes to reduce corruption and improve integrity in sectors particularly sectors vulnerable to corruption

These strategic pillars will be supported by the following 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.

- a) **Institutional Anti-Corruption policies:** -MDAs should be encouraged to develop their Anti-corruption policies with regard its employees, suppliers and other third parties;
- b) **Awareness raising and public dialogue – ACC should maintain a sustained civic education program through various platforms- traditional media, social media, giving talks and seminars**

- c) **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. Specific conflict of interest rules must be written clearly and unambiguously, so all officials know what constitutes a conflict of interest, and what decisions and actions will result in accountability
- d) **Implementation of the Right to information:** gives citizens the legal right of access to government documents without having to prove a particular interest, and the burden of justifying non-disclosure falls on the government administration.
- e) **Integrity pledges:** a set of promises made publicly by a group, typically government ministers, to a typical overseer, whereby any failure to perform the promise entails resignation from the group.
- f) **Codes of conduct:** a set of ethical standards to which institutions adopting the code will adhere to demonstrate their commitment to eliminate corruption from their activities.
- g) **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.
- h) **Integrity pacts:** an integrity pact is a formal no-bribery pact made by a group of related stakeholders (e.g., contractors are tendering for procurement contracts) whereby they set open and verifiable undertakings not to engage in corruption of any kind.
- i) **Whistle-blower and protection framework:** a key mechanism to overcome the culture of tolerance for corrupt practices, people must be provided with the means to report responsibly any abuses of power or acts of corruption
- j) **Citizens Charters:** set out the public services a government agency will offer and how it will respond to members of the public.

Pillar 1: Strengthen and enforce anti-corruption laws through exemplary punishment of offenders

	Strategic schemes	To mitigate
1.1	Strengthening enforcement of stringent laws to curb misappropriation, abuse of office, and other corruption offenses.	Enforcement of Corruption
1.2	Strengthening of legal sanctions against those abusing their authority, for instance, by having them return assets, they have corrupted and pay for damages caused by the said misuse of authority.	Enforcement of Corruption
1.3	Strengthening the coordination of handling of corruption cases among law enforcement agencies with the support of a comprehensive IT (e-law enforcement).	Enforcement of Corruption
1.4	Anti-bribery and corruption arrangement in the code of ethics of the profession, including lawyers, public accountants, and tax consultants. Giving heavier	Enforcement of Corruption

	sanctions for bribery performed by professionals regulated having the codes of ethics.	
1.5	ACC and other Law enforcement agencies are provided with sufficient resources, research, and analysis capacity to support effective investigations and prosecutions. Also, support them with a computerized case management system, procedural simplification, as well as measures aimed at strengthening the independence and integrity of the law enforcement authorities and the criminal justice system.	Enforcement of Corruption
1.6	Establish specialised task forces at the ACC and other Law enforcement agencies in promoting team-based management of cases and skilled pools of investigators, prosecutors	Enforcement of Corruption
1.7	A zero-tolerance policy on corruption offense. So long as there is reasonable suspicion, all reports of corruption, irrespective of whether it is severe or relatively minor, will be appropriately investigated.	Enforcement of Corruption

Pillar 2: Improve transparency and accountability (by government, business, and civil society sectors)

	Strategic schemes	To mitigate
2.1	Develop and implement awareness-raising campaigns and training interventions on legislation that give concrete effect to transparency, with a focus on the Promotion of the Access to Information Act and the Promotion of the Anti-Corruption Act and Procurement laws, in partnership with civil society and media.	Prevention of Corruption
2.2	The government should computerise all activities involving the delivery of public services on a mission mode. Adoption of technology would reduce direct interface between the citizens and the public officials. Information about the status of the processing of the application of beneficiaries on a "First Come First Served" basis and the progress of delivery should be displayed in public. The potential of the Unique ID project in preventing corruption in the delivery of public services should be fully exploited. This would minimise discretion, the subjective intervention of public authorities, and enhance objectivity. Literacy level and access should be given equal priority	Administrative Corruption
2.3	Setup an effective public complaint system to encourage reporting of corruption by members of the public and referrals from other institutions. ACC under PNB has a reporting Centre which should be rolled out to other services centers.	Administrative Corruption
2.4	Simplification of rules and procedures should be undertaken to make them citizen-friendly and avoid the need for the citizens to approach public officials for intervention. Review of systems and procedures should also aim at identifying and mitigating the risk of corruption. Ministry of Trade and Industry and the ACC Systems and Processes Unit should take up this exercise at the earliest.	Administrative Corruption

2.5	Establish appropriate instruments and mechanisms to provide for information on beneficial ownership through Amendments to or development of legislation regarding ownership of real properties, equities, etc. • Appropriate systems to capture and report on beneficial ownership. • Information and awareness-raising campaigns on the nature of beneficial ownership and the purpose of transparency in this area, in partnership with civil society and media.	Prevention of Corruption
2.6	Establish mechanisms for improving the transparency of governance in civil society organisations and private sector firms, in partnership with these sectors, for example, through • The development of guidelines for information to be provided to the public. • Awareness-raising campaigns and dialogues on transparency. • Other mechanisms.	Prevention of Corruption
2.7	Concealment of ill-gotten wealth should be made difficult by ensuring traceability and transparency of all transactions and investments using instruments like Anti-money Laundering provisions.	Prevention of Corruption
2.8	Develop mechanisms to improve business sector compliance with reporting requirements on corruption as outlined in the ACC Act, through mechanisms such as • Awareness-raising campaigns. • The development of guidelines regarding how and what to report.	Prevention of Corruption
2.9	Promotion of transparency, objectivity, and merit in selection and appointment to critical public offices, including the regulatory bodies.	Prevention of Corruption
2.10	Establishment by the Government a free and public database of laws that is officially recognized as the 'official' version of laws/regulations and is reliably and systematically updated will go a long way to impede corruption that is currently so easily executed in ways that are undetectable and for which no one can be held accountable.	Prevention of Corruption
2.11	Develop a law that contains mandatory and legally enforceable minimum standards for procedural transparency and integrity in the important processes of law drafting, legal quality control, reviews/consultations, and deliberation. These minimum standards must be subject to legally enforceable systems to ensure full compliance of each law, regulation, and another similar legal instrument.	Prevention of Corruption

Pillar 3: Improve the integrity of citizens and public institutions

	Strategic schemes	To address
3.1	Strengthening the independence and integrity of regulatory bodies. The performance and effectiveness of regulatory agencies in achieving fair-play in the regulation of business in their sectors should be evaluated periodically and reported to Parliament.	Prevention of Corruption

3.2	Strengthening the enforcement of corporate governance measures. Financial disclosure and accounting norms should be streamlined so that the payment of bribes and kickbacks gets disclosed in accounts and become challenging to conceal	Prevention of Corruption
3.3	Commitment to maintaining integrity in governance and combating corruption should be made a key election manifesto by all parties. Simultaneously the electorate should also be educated and made aware of giving due consideration to this manifesto and the integrity of candidates while casting their vote in elections.	Political Corruption
3.4	The concept of Integrity Pact should be made more effective by allaying the fear and enhancing the confidence of the private sector. It is a public-private partnership against corruption in public procurement. Private sector participation in Integrity Pact is still not wholehearted and treated as more of a ritual. Further citizens and civil society organizations should be involved to act as monitors of Integrity Pact.	Prevention of Corruption
3.5	About public procurement contracts, the private sector is driven to corruption, mainly due to the phenomenon of "winner's curse." The bidder for a government contract believes that if he does not bribe other competitors would bribe and win the contract because they are convinced that it is the only way of doing business with the government. Efforts need to be made to allay the fears and convince the private sector to contribute towards a corruption-free public procurement regime. The private sector should be urged to renounce its misperception of being a hapless victim of the corrupt system and instead come forward and cleanse the system by desisting from corruption. They need to take some initial risk for their long-term interest.	Prevention of Corruption
3.6	Ensuring that adequate budgetary allocations are made available promptly to MDAs based on approved allocations. In additions, improvement in the Conditions of public servants should be looked into as quickly as possible.	Prevention of Corruption

Pillar 4: Reinforce citizens' empowerment in the fight against corruption

	Strategic schemes	To address
4.1	Citizens should be empowered to resist the demand for bribes by instituting mechanisms like "Anti Bribery Hot Lines" or Whistle Blower provisions so that citizens can report solicitation of bribes which should then be followed by prompt action. Citizens should also be persuaded and convinced to desist from paying bribes through awareness and education campaign. d. Promoting the involvement of citizens and Civil Society Organisations in keeping vigil through means of social audit.	Prevention of Corruption
4.2	Improve service delivery by adopting an action plan for improving standards of public service through benchmarking and assessment. Innovative and localised solutions should be promoted with the involvement of civil society organisations. Instruments like citizen charters,	Prevention of Corruption

	centralised public grievance, and monitoring system (CPGRAMS) and citizen report card system developed.	
4.3	To recognize and reward the efforts of companies that voluntarily embody good anticorruption policies, a system of “credits” should be introduced. Companies would be eligible to earn credits on various objective parameters. A framework should be evolved under which specific concessions or incentives should be made available to companies holding credits. Incentives could be in the form of additional points when evaluated for government contracts, priority clearances for major projects, governmental assistance or endorsement in tapping foreign markets, etc.	Prevention of Corruption
4.4	Graduate towards transparent and participative policymaking in place of closed-door policy, especially about grant of licenses, auction of public assets, the award of large public contracts and in formulating regulatory norms. After the finalisation of policy and before its implementation, the opportunity should be given to all stakeholders to review, debate, and contest the policy to ensure fair play.	Private Sector Participation in Corruption
4.5	Corruption needs to be mainstreamed on the agenda of bodies like women organisations, professional organisation, religious organisation, etc. who have either ignored this aspect or done very little in this direction. This is the most significant service which they can do to the sector they represent and the people at large.	Civil Society Participation in the prevention of Corruption
4.6	Citizens should be empowered to resist corruption by enabling them to report solicitation of bribes in vulnerable service delivery activities like vehicle licenses, passport, registration of property, local authority services, health schemes, etc. The system of hotlines through 'Pay-No-Bribe should be reinforced for this purpose so that prompt action is taken on the complaints. The system should be regularly monitored as a high priority activity by the ACC.	Encourage citizens to resist corruption.

Pillar 5: Develop a sustainable partnership with stakeholders

	Strategic schemes	To address
5.1	The ACC should develop sustainable partnership through Memorandum of Understanding with the following integrity institutions: <ul style="list-style-type: none"> ✓ Audit Service ✓ Sierra Leone Police ✓ Financial Intelligence Unit ✓ National Public Procurement Authority 	Integrity Institutions to resist corruption
5.2	The ACC should develop sustainable partnership through Memorandum of Understanding with the following support Institutions: <ul style="list-style-type: none"> ✓ Media ✓ Civil Society targeting the promotion of good governance and accountability ✓ Chamber of Commerce ✓ Inter-religious Council 	Prevention of Corruption

5.3	Establish National Anti-Corruption Forum as a platform to coordinate and strengthen anti-corruption and integrity effort across the business, civil society, and government sector. Ensuring that the Forum has the necessary leadership, support, resources and appropriate structure to be effective	Prevention of Corruption

Pillar 6: Strengthen oversight mechanism in Government sectors

	Strategic schemes	To address
6.1	Political parties should demonstrate the political will to fight corruption by adopting and enforcing a code of ethics among members, avoiding conflict of interest in an appointment to public offices and adopt integrity in governance and prevention of corruption as a key election manifesto	Political Corruption
6.2	Disclosure of source of funding and the annual financial statements of the political parties should be made mandatory to the public. Regulation of election funding and expenditure should be further strengthened.	Prevention of Corruption
6.3	A system of blacklisting and debarring of companies found guilty of indulging in unethical practices should be instituted	Prevention of Corruption
6.4	Political parties should adopt a code of ethics and vigorously enforce it. Personal integrity should be given due weight while enlisting members or giving tickets for election. These are mandatory minimum measures for establishing the credibility of the political institutions.	Political Corruption
6.5	Political parties should avoid conflict of interest while nominating members to public offices like ministers, chairpersons or member of parliamentary committees.	Political Corruption
6.6		

Pillar 7: Strengthen the resourcing, cooperation, and independence of dedicated anti-corruption agencies

	Strategic schemes	To address
7.1	<p>Objectivity and transparency should be ensured in senior-level appointments to integrity institution like the ACC, Audit Services, Police, Judges. The following recommendations should be implemented to achieve this:</p> <ul style="list-style-type: none"> • Bring transparency to the appointment process of Judges, for example. • Open competition for selection to the posts and Selection to be based on performance and domain competence. • Selection through an independent authority. • Setting time limits for the selection process. • If the administrative ministry disapproves a panel, it should put forward its speaking reasons. • The setting of objective and transparent criteria for appointments, promotion, and dismissals for senior positions. 	Administrative Corruption

7.2	Strengthen the independence and integrity of regulatory bodies. Conflict of interest in an appointment to regulatory authorities should be avoided. Appointment to regulatory agencies should be free from the patronage system and should be based on merit, past performance, domain knowledge, and integrity. Performance and effectiveness of regulatory bodies in ensuring level playing field in their sector of operation should be reviewed periodically by oversight bodies and the report presented to Parliament.	Prevention of Corruption
7.3	Despite the provision of special judges in Corruption Cases, there is a considerable backlog. The delays are mostly on account of in- the establishment of special courts for corruption, resource constraints of the courts, etc. To enhance efficient case disposal, adequate strength of judges along with requisite support staff, should be sanctioned. A mandatory outer time limit of six months should be set for the disposal of corruption cases.	Enforcement of Corruption
7.4	The Complaint and Ethics committee tasked with investigating cases of corruption within the judiciary needs to be strengthened. While such a suggestion has been considered in the past, it is important that the role and constitution of the Committee be carefully structured to balance the twin goals of increasing judicial responsibility and protecting the independence of the judiciary.	Enforcement of Corruption
7.5	Ensuring that adequate budgetary allocations are made available promptly to dedicated integrity institutions	Prevention of Corruption

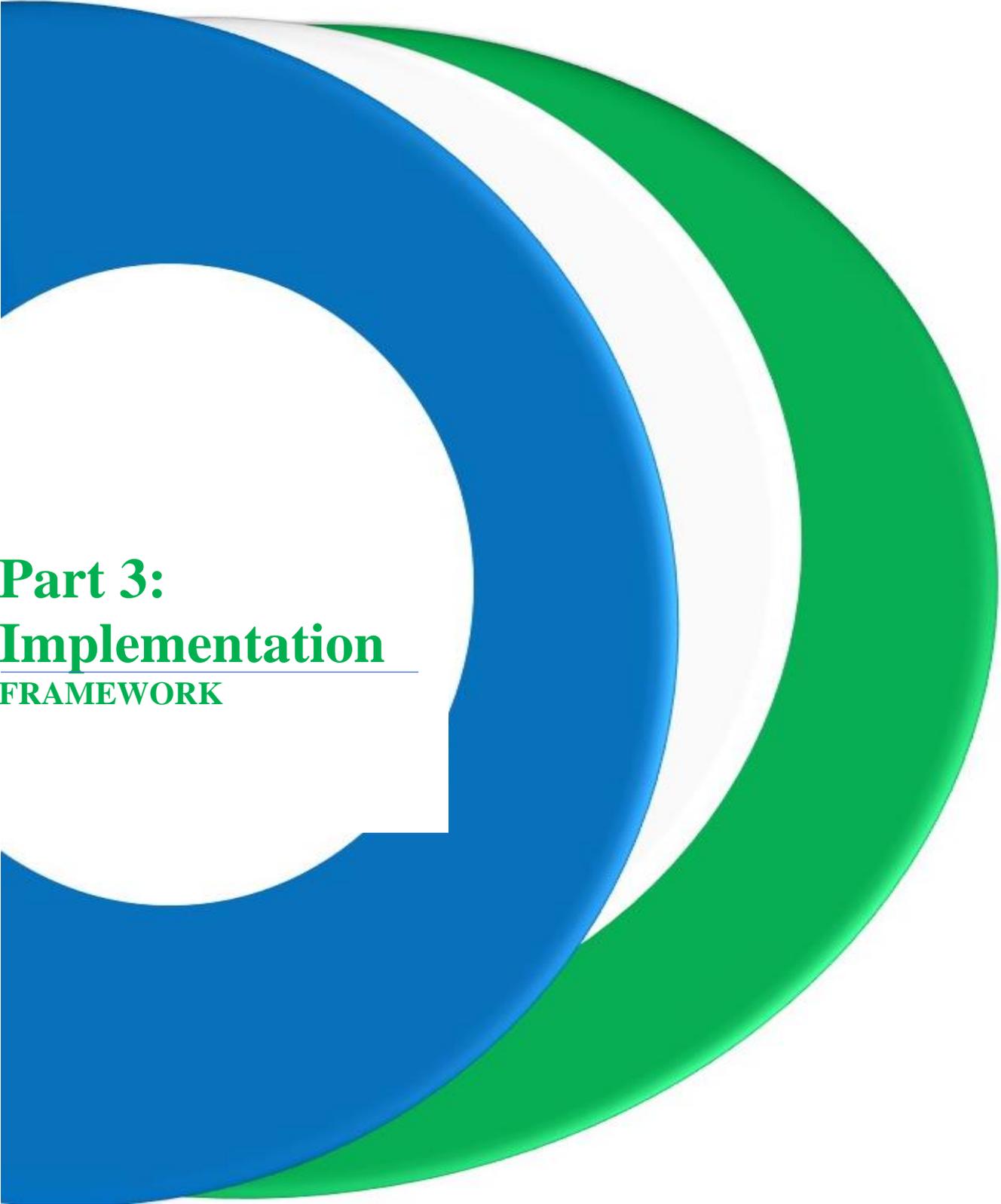
Pillar 8: Build specific programmes to reduce corruption and improve integrity in sectors particularly vulnerable to corruption

	Strategic schemes	To address
8.1	The private sector should realise that corruption is against the long-term interest of the business as it distorts the market and increases the cost of doing business. The private sector should, therefore, work for a corruption-free market-based transaction system.	Private Sector Corruption
8.2	The ACC Act 2008 to be amended to cover private sector corruption. The ACC Act does not expressly seek to punish corrupt acts of private parties, except to a limited extent dealing with persons offering advantage to a public officer; using their influence on a public servant in the conduct of an official transaction; or in terms of the broader offence of conspiracy to commit a corruption offence whereby a private person can try and convicted along with a public officer. However, there is no direct provision prohibiting a private person from offering a bribe or engaging in other corrupt practices in private	Enforcement of Corruption

	transactions. Such a provision is required to ensure that all parties to corruption are dealt with adequately.	
8.3	The provisions of the ACC Act are inadequate since restitution of misappropriated monies is lacking in the current legislation. It is imperative that the proposed amendments to the Anti-corruption Act be passed to include the powers of the court to order full restitution in addition to fines/jail term. This ensures that corrupt officials do not benefit at all from corrupt acts or transactions.	Enforcement Corruption
8.4	To introduce transparency in the working of the Media Organisation, the owners, proprietors, and editors should be asked to disclose their financial, political and other interests which can have a bearing on the objectivity of the Organisation	Prevention of Corruption
8.5	Campaign to educate and create awareness in the society against the evil of corruption. This should include a media campaign as well as outreach activities. ACC is already in the process of launching an Awareness Campaign. This has to be on a sustained basis to achieve the desired impact.	Prevention of Corruption
8.6	Education is the foundation of a morally sound society. Lesson on ethics should be included in the curriculum of schools. Children should be taught to achieve their goals and to earn money through rightful means to be taught in middle school.	Prevention of Corruption
8.7	Develop a code of conduct for religious groups as most of these organisations and houses have lost the moral ground of integrity and accountability, and that has contributed immensely to the acceptance of corrupt practices across the country. The vast size of the Sierra Leone population is religious and see their religious leaders as examples.	Prevention of Corruption
8.8	<ul style="list-style-type: none"> • The Government can give its commitment to not interfering with the press. Competition and liberalisation of the media should be encouraged through private ownership. The legislation is required to avoid monopoly control of media sources. Local TV and radio stations are a priority, as they have a valuable role to play in social empowerment, and local accountability and public participation. • Considerable steps can be taken by the media to enhance their integrity and professionalism. A code of ethics developed with the wide participation of journalists is an important first step. Increased pay for journalists is imperative, but this issue should be outside the purview of government. The media must take urgent steps to improve the quality and accuracy of its coverage and increase its capacity to root out corruption. • Training in investigative reporting is critical, as that are source protection provisions for 	Prevention of Corruption

	<p>journalists to ensure that they are free to undertake such reporting.</p> <ul style="list-style-type: none"> • Government and civil society must work together to provide an enabling environment and support for NGOs, to ensure that confidence in the NGOs is not betrayed by unscrupulous elements and low competence. Government is already created a regulatory framework for NGOs through a non-consultative method which should be looked into. CSOs must respond with transparent accounting and reporting, and appropriate codes of conduct. 	
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Part 3:
Implementation
FRAMEWORK

PART 3- IMPLEMENTATION FRAMEWORK

The Way Forward to Implementation

The NACS stakeholder consultation justifies some degree of optimism, it is critical at this point not to be swept away with enthusiasm about the strategy. The strategy and the implementation Action plan must be subjected now, and continually, to the strictest "achievability test" – what can actually be achieved? We advocate optimism with pragmatism. It is better to invest limited resources in a small number of isolated initiatives that work effectively and give hope, than spread resources thinly – and fail, reinforcing the views of the cynics.

This Strategy is an integral part of the Implementation Action Plan and each reinforces the other.

CONCLUSIONS

This strategy recognises that corruption does not respect national or organisational boundaries. To counter it we need strong partnerships involving governments, the private sector and civil society at local and global levels. The strategy has set out our partnership approach and priorities.

It is imperative to note the following in rolling out the strategy:

- The focus on corruption should not divert from the broader meeting the goals in the National Development Plan & other reforms;
- efforts that shortcut existing institutions and governance systems may be counterproductive (fragility of institutions may be bigger/deeper problem than corruption);
- Quick fixes may not be sustainable;
- The measures are not based on 'symptomatic economics' .Tendency of focusing on the symptoms rather than causes;
- The Strategy is broad framework, the biteable measures are in the Implementation Action Plan.

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