

INDEPENDENT REPORTING MECHANISM (IRM):

SIERRA LEONE END-OF-TERM REPORT 2014-2016



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First End-of-Term Report



INDEPENDENT REPORTING MECHANISM (IRM): SIERRA LEONE END-OF-TERM REPORT 2014-2016

Sierra Leone accelerated implementation of its commitments in the second half of the action plan period. The government largely completed five out of eleven commitments, representing preparatory steps for a number of government reforms. However, many activities were internal to the government and have not led to significant improvements in citizens' access to information or participation opportunities.

The Open Government Partnership (OGP) is a voluntary international initiative that aims to secure commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. The Independent Reporting Mechanism (IRM) carries out a review of the activities of each OGP participating country. This report summarises the results of the period July 2014 to June 2016, covering the implementation of Sierra Leone's first National Action Plan (NAP).

The Open Government Initiative (OGI), in the Office of the President, coordinates OGP in Sierra Leone. OGI led the development of the action plan and facilitated the establishment of the National Steering Committee, supported by government ministries, departments and agencies (MDAs) that were directly in charge of implementing commitments.¹

Sierra Leone presented its second action plan on 30 June 2016. It contains ten commitments, eight of which are new. According to the OGP Coordinator, the Steering Committee had decided to address newer issues, reflecting the priorities of citizens gathered during consultations. Two commitments were carried over from the first action plan: Commitments 5 (audit) and 8 (records and archives). Both commitments were slightly modified. In the second action plan, the audit commitment focuses on implementing only procurement-related audit recommendations. Another modified commitment on public records management intends to ensure passage of the National Records bill and coordinate digital record management.

The government published the end of term self-assessment report on 30 September 2016.

TABLE 1: AT A GLANCE

NUMBER OF COMMITMENTS: 11

LEVEL OF COMPLETION

	MIDTERM	END OF TERM
COMPLETED:	0	1
SUBSTANTIAL:	1	4
LIMITED:	9	5
NOT STARTED:	1	1

NUMBER OF COMMITMENTS WITH:

CLEAR RELEVANCE TO OGP VALUES:	10	10
TRANSFORMATIVE POTENTIAL IMPACT:	4	4
SUBSTANTIAL OR COMPLETE IMPLEMENTATION:	1	5
ALL THREE (★):	0	2

DID IT OPEN GOVERNMENT?

MAJOR:	N/A	0
OUTSTANDING:	N/A	0

MOVING FORWARD

COMMITMENTS CARRIED OVER TO NEXT ACTION PLAN:	2
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This report was prepared by Charlie Hughes, an independent researcher.

¹Excluding foreign missions, there are 100 MDAs in the country, taken from a count in the government list in the annual Government Budget and Statement of Economic and Financial Policies.

CONSULTATION WITH CIVIL SOCIETY DURING IMPLEMENTATION

Countries participating in the OGP follow a process for consultation during development of their OGP action plan and during implementation. Sierra Leone used two methods to collect citizen feedback. First, the Steering Committee centralised consultations by holding monthly meetings hosted at either the OGI premises or the OGP Secretariat. The thirty-four-member committee had equal representation from government agencies and civil society organisations. Monthly meetings were open to members of the Steering Committee only. However, members of the press were regularly invited to witness the deliberations and report on the meetings. The main concern with these meetings was the infrequent attendance by government representatives. Throughout the two-year period, civil society organisations were the primary participants. As reported in the earlier progress report, government agencies saw the Steering Committee as a civil society affair.

The second way Sierra Leone collected citizen feedback was through town hall meetings. Steering Committee members travelled to communities and discussed the implementation progress directly with Sierra Leoneans. Although these meetings were opened to the public, they were irregular and followed no strict schedule. All civil society members of the Steering Committee interviewed by the researcher confirmed that the town hall meetings took place, but none could indicate an exact number.

Table 2: Action Plan Consultation Process

PHASE OF ACTION PLAN	OGP PROCESS REQUIREMENT (ARTICLES OF GOVERNANCE SECTION)	DID THE GOVERNMENT MEET THIS REQUIREMENT?
During Implementation	Regular forum for consultation during implementation?	Yes
	Consultations: Open or Invitation-only?	Open
	Consultations on IAP2 spectrum ¹ ?	Inform

¹ IAP2 Spectrum of Political Participation, International Association for Public Participation, http://www.iap2.org/resource/resmgr/Foundations_Course/IAP2_P2_Spectrum.pdf.

PROGRESS IN COMMITMENT IMPLEMENTATION

All of the indicators and method used in the IRM research can be found in the IRM Procedures Manual, available at (<http://www.opengovpartnership.org/about/about-irm>). One measure deserves further explanation, due to its particular interest for readers and usefulness for encouraging a race to the top between OGP-participating countries: the “starred commitment” ★. Starred commitments are considered exemplary OGP commitments. In order to receive a star, a commitment must meet several criteria:

1. It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have “medium” or “high” specificity.
2. The commitment’s language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability.
3. The commitment would have a “transformative” potential impact if completely implemented.
4. Finally, the commitment must see significant progress during the action plan implementation period, receiving a ranking of “substantial” or “complete” implementation.

Based on these criteria, at the mid-term report, Sierra Leone’s action plan contained no starred commitments. At the end of term, based on the changes in the level of completion, Sierra Leone’s action plan contained two starred commitments: Commitment 5 on the Single Treasury Account and Commitment 10 on the Right to Access Information.

Commitments assessed as star commitments in the mid-term report can lose their starred status if at the end of the action plan implementation cycle, their completion falls short of substantial or full completion, which would mean they have an overall limited completion at the end of term, per commitment language.

Finally, the graphs in this section present an excerpt of the wealth of data the IRM collects during its progress reporting process. For the full datasets for Sierra Leone, see the OGP Explorer at www.opengovpartnership.org/explorer.

ABOUT “DID IT OPEN GOVERNMENT?”

Often, OGP commitments are vaguely worded or not clearly related to opening government, but they actually achieve significant political reforms. Other times, commitments with significant progress may appear relevant and ambitious, but fail to open government. In an attempt to capture these subtleties and, more importantly, actual changes in government practice, the IRM introduced a new variable ‘did it open government?’ in End-of-Term Reports. This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice has changed as a result of the commitment’s implementation. This can be contrasted to the IRM’s “Starred commitments” which describe potential impact.

IRM Researchers assess the “Did it open government?” with regard to each of the OGP values that this commitment is relevant to. It asks, did it stretch the government practice beyond business as usual? The scale for assessment is as follows:

- Worsened: worsens government openness as a result of the measures taken by commitment.
- Did not change: did not change status quo of government practice.
- Marginal: some change, but minor in terms of its impact over level of openness.
- Major: a step forward for government openness in the relevant policy area, but remains limited in scope or scale.
- Outstanding: a reform that has transformed ‘business as usual’ in the relevant policy area by opening government.

To assess this variable, researchers establish the status quo at the outset of the action plan. They then assess outcomes as implemented for changes in government openness.

Readers should keep in mind limitations. IRM End-of-Term Reports are prepared only a few months after the implementation cycle is completed. The variable focus on outcomes that can be observed on government openness practices at the end of the two-year implementation period. The report and the variable do not intend to assess impact because of the complex methodological implications and the time frame of the report.

GENERAL OVERVIEW OF COMMITMENTS

Sierra Leone's first OGP action plan had 11 commitments. The commitments focused on several areas: improving public integrity, transparent management of public resources, and corporate accountability, as well as access to data concerning the mining sector.

The government and civil society concurred that each issue in the action plan addressed at least one of the major challenges for Sierra Leone's democratic governance and economic development. However, the implementation of the action plan faced two key problems. First, government attendance at the Steering Committee meetings was low, and coordination was insufficient among agencies with key responsibilities for implementing the commitments. For example, the commitment to increase audit recommendations never involved the Audit General's office. The second problem facing the plan's implementation was the outbreak of the Ebola virus disease in 2013-2014. The government prioritized efforts to end the epidemic ahead of implementation activities.

Table 3: Overview: Assessment of Progress by Commitment

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	END OF TERM		Worsened	Did not change	Marginal	Major	Outstanding
															Substantial	Completed					
THEME 1: Improving Public Integrity																					
1. Public Integrity Pacts.			X		X		X			X				X							
2. Archives and Records Management Act.				X	X		X				X			X				X			
THEME 2: Transparency in Budget Management of Public Resources																					
3. Scale up Performance Management and Service Delivery.			X		X	X					X			X						X	
4. Compliance with audit measures.			X		X						X			X				X			
5. Single Treasury Account.			X		X						X			X				X			
6. Extractive Industry Revenue Act.				X	X	X					X			X				X			
7. Scale up extractive industry transparency initiative.				X	X						X			X				X			
THEME 3: Corporate Accountability and Open Data for Mining																					
8. Local content policy linkages with MDAs.				X	Unclear						X				X					X	

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE <i>(as written)</i>				POTENTIAL IMPACT				COMPLETION		MIDTERM END OF TERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding
9. Publish and revise 70% of mining and agricultural contracts.				X	X						X			X				X			
10. Right to access information.			X		X		X				X		X		X			X			
11. Open Data portal.				X	X	X	X			X			X		X				X		

THEME 1 | IMPROVING PUBLIC INTEGRITY

1. Develop and implement a Public Integrity Pact with 5 Ministries, Departments and Agencies

Commitment Text:

Sierra Leone does not currently have a public integrity policy, however, it is expected that a Public Integrity Policy will institute safeguard measures that will guarantee timely access to public services. There is a Code of Conduct for all public officials and other regulations, however, adherence and popularization leaves much to be desired which adversely affects corruption. It is expected that the development of the Pacts will promote ethical and proactive performance by public officials in the discharge of their duties especially in delivering key public services in an effort to improve accountability.

Actions:

- Dissemination, administration and enforcement of existing integrity policies to improve public trust strengthened.
- 5 pilot MDAs selected to sign an integrity pact with ACC on key commitments to reduce corruption in their Institutions.
- Service charters for 20% MDAs (including 5 pilot MDAs for integrity pacts) which clearly identifies the service provided, timeframe to expect service to be rendered and any associated costs developed and displayed with clearly visible complaints mechanisms to identify when services are not rendered according to published procedures and timeframes.
- Yearly assessment of integrity commitments undertaken for 5 pilot MDAs.

Responsible Institution: Anti Corruption Commission

Supporting Institution(s): Ministry of Information and Communication. Public Sector Reform Unit. Open Government Initiative

Start Date: April 2014

End Date: June 2016

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding
1. Public Integrity Pacts			X		X	X			X				X	X					X		

COMMITMENT AIM

This commitment aimed to promote ethical conduct among public officials in accordance with standardized regulations for delivering key public services. Sierra Leone did not have a public integrity policy. Although a Code of Conduct already existed, public officials rarely adhered to these rules.

This commitment had two primary goals. The first was to ensure that 20% of Ministries Departments and Agencies (MDAs) create service charters clearly identifying the public services provided, the timeframe for service delivery, and any associated costs. The charters would include a clearly visible complaint mechanism for citizens to report services that do not meet these standards. Secondly, the Anti-Corruption Commission (ACC) was to sign Public Integrity Pacts with five pilot MDAs to ensure timely access to public services.

STATUS

Midterm: Limited

In May 2015, the ACC signed Integrity Pacts with five pilot MDAs. However, the ACC did not publicly disclose the contents of the Integrity Pacts. As of July 2015, ten MDAs published service charters outlining standards and expectations for service delivery. None of the Service Charters included a complaint mechanism. This represented 10% of all MDAs in the country.¹ In the mid-term progress report, government officials did not show any specific results achieved towards stronger dissemination, administration, and enforcement of integrity policies. For further information please see Sierra Leone's IRM Mid-Term Report.²

End of term: Limited

By the end of the implementation period, the government made limited progress in disclosing service charters. At least 21 out of the country's 100 MDAs publicly displayed their Service Charter on billboards and posters, meeting the 20% commitment target.³ However, none of the published service charters included a complaint mechanism as the commitment intended.

Since June 2015, the ACC took action to promote the dissemination, administration and enforcement of integrity policies. The ACC organised special events and programmes to educate public officials on integrity policies. For example, the researcher attended the signing ceremony for the second round of MDA's public integrity pacts at the ACC's office in August 2015. However, the ACC never made the integrity pacts available to the public, and therefore their content cannot be assessed.

One notable ACC initiative is the online corruption tracker, which provides citizens access to information about ongoing and completed corruption court cases.⁴ This allows citizens to track service delivered by the courts. While the ACC carried out additional activities to create an accountability mechanism through the corruption tracker, these fell outside the scope of this commitment and therefore cannot be assessed. For instance, in February 2016, the ACC began a national "Pay No Bribe" campaign using posters, radio, and television. The campaign included publicising the online corruption tracker through which citizens could report officials who asked for a bribe in return for public services. While commendable, this tracking platform does not replace the service charter complaint mechanism that this commitment envisioned.

The service charter complaint mechanism would allow citizens to report problems directly related to public service delivery, such as receiving the wrong amount or type of medication from a health clinic or an unanswered visa application. While a positive step, the bribery-reporting mechanism is not a substitute for creating a way for citizens to report specific service issues.

The ACC stated it began a yearly assessment of MDAs' implementation of public integrity pacts. Based on the government's self-assessment report, the yearly assessment is considered complete. However the IRM researcher did not find any public information on MDAs' progress toward implementing integrity pacts.

DID IT OPEN GOVERNMENT?

Access to information: Marginal

Public accountability: Marginal

The commitment had the potential to inform citizens of their rights and entitlements regarding public services and to provide a system of redress if their expectations are unmet. The commitment brought marginal change; the government disseminated public integrity policies and 20% of government institutions displayed their service charters, meeting the commitment target. Civil society organisations note that this represents an improvement because citizens now have more information on the required level of public services. In the IRM researcher's view, the online corruption tracker also brought some change to government openness by making the justice system more transparent.⁵ While not a commitment requirement, the ACC developed a platform for reporting bribery in parallel with the service charters. This led to an increase in public accountability by making it easier for citizens to report corruption in the public service sector.

CARRIED FORWARD?

The ACC did not carry this commitment forward. To complete the commitment, the ACC would need to conduct yearly assessments of MDAs' implementation of their public integrity pacts. The OGI could solicit the help of CSOs engaged in accountability issues to encourage the ACC to finalise its assessment procedures and announce a firm commitment to annually assess MDAs' implementation of their public integrity pacts beginning in 2017.

¹Excluding foreign missions, there are 100 MDAs in the country, taken from a count in the government list in the annual Government Budget and Statement of Economic and Financial Policies.

²See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

³Those that have Service Charters include the Ombudsman, Electricity Distribution and Service Authority, National Social Security Trust, Immigration Department, Sierra Leone Road Safety Authority, Corporate Affairs Commission, Njala University College, Sierra Leone Postal Service, Sierra Leone Ports Authority, National Minerals Agency, National Revenue Authority, Environmental Protection Agency, Freetown City Council, Freetown Teachers College, Western Area Rural District Council, Lungi International Airport, Makeni City Council, Office of the Registrar General, Ministry of Agriculture, Forestry and Food Security, Tertiary Education Commission, Sierra Leone Investment and Export Promotion Agency, and the Ministry of Energy and Power.

⁴Yuki Yuki (Corruption) Tracker, (Anti-Corruption Commission, 2016), www.corruptiontrackersl.com.

⁵Programme Officer, Center for Accountability and Rule of Law, personal interview by Charlie Hughes, 28 Oct. 2016; and Governance Officer, Society for Democratic Initiatives, personal interview by Charlie Hughes, 1 Nov. 2016.

2. Public Records Management Act

Commitment Text:

The Archive and Records Management Bill has been drafted and several small scale consultations have already been had in collaboration with the Strategy and Policy Unit in the Office of the President. However, it has yet to be tabled by Cabinet or Parliament. Passing the Archive and Records Management Bill will support the implementation of the Right to Access Information Act as it will serve as a key tool to informing database management and archiving of key Government documents that will be stored in formats that are accessible to the public vis-a vis print and electronic.

Actions:

- Public consultations on the Archives and Records Management Bill undertaken.
- Draft tabled in Cabinet by the Ministry of Information and Communication in collaboration with the Ministry of Education, Science and Technology.
- Capacity and needs assessment in records management completed.
- Bill submitted to Parliament by Ministry of Information and Communication.
- Archives and Records Management Bill passed by Parliament.
- Establish of an e-governance infrastructure.

Responsible Institution: Public Sector Reform Unit

Supporting Institution(s): Open Government Initiative

Start Date: April 2014

End Date: June 2016

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		END OF TERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding		
2. Archives and Records Management Act				X	X		X				X			X				X					

COMMITMENT AIM

This commitment aimed to support the Right to Access Information Act by passing an Archives and Records Management Bill. This commitment also served as a key tool to inform database management and archiving practices for government documents. Finally, the government hoped to use this commitment to establish an e-governance framework to facilitate public access to official documents”?

STATUS

Midterm: Limited

This commitment was part of the government's effort to develop a Public Records Management Act. In 2014, selected ministries and local councils conducted a self-assessment of their records management. As a result of their findings, the Public Service Reform Unit (PSRU) recommended the development of a Public Records Management Policy and Public Archives Bill. As of July 2015, the government drafted a Public Archives and Record Management Bill, but it had not been evaluated in Cabinet. A key stumbling block, according to the head of the PSRU and civil society representatives, was that the proposed reforms to archive management required moving the Public Archives Department's authority from the Ministry of Education, Science and Technology (MEST) to the Ministry of Information and Communication (MIC). Disagreement between the ministries over how to reorganise responsibilities stalled the process. Given these delays, the government had not begun developing an e-governance framework. Prior to the commitment period, the government audited the record management process to determine weaknesses and problems; the outcome informed commitment activities. Please see Sierra Leone's IRM Mid-Term Report for further information.¹

End of term: Limited

In the period following June 2015, responsibility for the Public Archives Department passed from the MEST to MIC, resuming progress on records management reform. According to the implementing MDAs, the government has finalised the text of the Archives and Records Management Bill.² The government self-assessment report states that it completed public consultation on the bill, and it was tabled in Cabinet. However, the Ministry of Information and Communication has not yet submitted the bill to Parliament.

According to its self-assessment report, the government established an e-government framework.³ However, the report gave no details as to how or what the completion of this infrastructure entailed. Government officials confirmed progress on a range of e-governance prerequisites.⁴ These included laying fibre-optic networks across the country, installing intranet connectivity in 47 government institutions, and further developing the policy framework. While these activities are necessary, the government official directly overseeing the e-governance rollout believes that this progress does not equate to full establishment of an e-governance framework as indicated in the self-assessment report.⁵ The basic prerequisites for e-governance include a legal framework, a minimum threshold of technological infrastructure, and a re-design and integration of government organisation and processes.⁶ The Sierra Leonean government has yet to achieve these prerequisites, and civil society organisations that promote access to information share this view.⁷

DID IT OPEN GOVERNMENT?

Access to information: Did not change

Poor records management as a consequence of inadequate legislation hinders citizens' access to government-held information. The Public Records Management Bill could improve the organisation, storage, and retrieval of archived information thereby making it easier for public institutions to release such information to citizens when demanded.

The government has not passed the Archives and Records Management Bill, therefore access to information has not changed as a result of this commitment. The government is moving towards e-governance, but work remains before the infrastructure is complete. Relevant civil society organisations believe a good indication of a sufficient e-government infrastructure is regular use e-services in the conduct of governance. However, this practice has not yet occurred.⁸ Due to the limited progress on its key deliverables, this commitment did not change or improve access to information.

CARRIED FORWARD?

The government carried forward this commitment in the second action plan. In addition to the passage of the National Records Bill, the commitment aims to harmonize policies and procedures for managing digital records with the Right to Access Information law and the open data portal.

¹See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership: 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

²Information obtained from the Ministry of Information and Communication, the Public Service Reform Unit and the Right to Access Information Commission.

³See the milestone progress summary, Sierra Leone Open Government Programme Self Assessment Report for the Period 2014 to 2016. Sept. 2016) 15.

⁴Chairman, Project Management Unit-West Africa Regional Backbone and e-governance project, personal interview by Charlie Hughes, 23 Oct. 2016.

⁵Ibid.

⁶Nancy J. Hafkin, E-governance in Africa: An overview of progress made and challenges ahead, 17-19 Feb. 2009, <http://wisat.org/wp-content/uploads/unpan034002.pdf>.

⁷Interview of Director of Society for Knowledge Management, personal interview by Charlie Hughes, 13 Nov. 2016.

⁸Ibid; Governance Officer, Society for Democratic Initiatives), personal interview by Charlie Hughes, 1 Nov. 2016.

THEME 2 | TRANSPARENCY IN BUDGET MANAGEMENT OF PUBLIC RESOURCES

3. Scale up performance management and service delivery directorate

Commitment Text:

The Performance Management and Service Delivery Directorate (PMSD) was established in 2013 in the Office of the Chief of Staff to lead performance contracting of key public officials within key service delivery institutions across Government. To date, performance contracts have been rolled out to over 80% of ministries, departments and agencies (MDAs), tertiary education institutions and local councils. The Performance Tracking Table is used to help institutions plan their activities against which they are assessed on a bi-yearly basis in a bid to ensure improved service delivery, however, dissemination of the assessments to the public has been poor, which has undermined its objectives of improving accountability. Improving on civic participation in the PMSD process will increase accountability which is assumed will result in improved service delivery.

Actions:

- *All assessments of MDAs covered by PMSD published in a yearly volume to be made available to the public in print and online mediums.*
- *9 pilot MDAs for implementation selected.*
- *Ensure that in the planning and budget cycle for an initial 9 piloted MDAs; yearly activity plans are prepared in conjunction with procurement plans which will be the basis of budgets submitted for consideration to the Ministry of Finance and Economic Development. The planning cycle and fiscal cycle must be synchronized to ensure that the activity based budget by MOFED is in fact informed by proper planning vis-à-vis a robust activity and procurement plan, which should inform budget preparation.*
- *Town Hall meeting held not more than 2 months after publication to engage the public on the findings by the Performance Management and Service Delivery Directorate through a public bi-yearly assessment of the performance contracts.*

Responsible Institution: Performance Management and Service Delivery Directorate

Supporting Institution(s): Open Government Initiative

Start Date: April 2014

End Date: June 2016

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		END OF TERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding		
3. Scale up Performance Management and Service Delivery.			X		X	X					X			X						X			

COMMITMENT AIM

The commitment aimed to expand and improve monitoring and assessment of MDA delivery of public services. Transparency on the performance assessment outcomes was poor during the action plan development. This commitment promoted performance contracts and allowed citizens to engage with the process.

STATUS

Midterm: Limited

Completion as of June 2015 was limited. The government had not published the results of the yearly assessment of MDAs under the Performance Contract scheme. At the time the action plan was drafted, all 24 ministries, 19 local councils, two public universities, and 26 state-owned enterprises had signed performance contracts. Therefore, the government considered the “nine pilot MDAs selected” goal completed. Similarly, the government introduced activity-based budget planning by MDAs two years before the development of the action plan, rendering this part of the commitment redundant. During the first year of implementation, the government did not hold town hall meetings on the findings by the Performance Management and Service Delivery Directorate. For further information, please see Sierra Leone’s IRM Mid-Term Report.¹

End of term: Substantial

The government publicly announced the results of the 2015 Performance Contracts on 4 August 2016 at a specially convened conference. At the same event, according to newspaper reports, the President signed performance contracts for 2016 with government institutions, state-owned enterprises, and local councils.² Although the media covered the event, the content of the 2015 results were not published or made permanently available as envisaged in the commitment.

According to the government self-assessment report, the government held a town hall meeting in August 2016 to engage the public on the findings of Performance Contract assessments of the 2015 results.³ However, CSOs interviewed by the researcher stated that the government should have held more meetings outside the capital city (Freetown) to explain the Performance Contracts findings to other segments of the population. The head of the PMSD, however, told the researcher that the Chief of Staff in the Office of the President later approved a consortium

of CSOs to popularise the Performance Contracts and engage citizens. This official said that the CSOs had started popularising Performance Contracts at the time of the end-of-term report.⁴

The head of the PMSD told the researcher that the Directorate has piloted a “participatory community monitoring framework” in 54 communities across various regions to improve Performance Contract engagement and community feedback.”⁵ However, a CSO representative on the Steering Committee involved with this commitment says he was unfamiliar with monitoring framework initiatives.⁶ Two other CSOs representatives on the Steering Committee said they were also unfamiliar with participatory community monitoring outreach initiatives, though this could be due to their recent implementation at the end of the action plan period.⁷

DID IT OPEN GOVERNMENT?

Access to information: Marginal

Civic participation: Did not change

Sierra Leone has never had a system to regularly measure the efficacy of public institutions and their delivery of public services. This commitment intended to spark public discussion around accountability and the performance of public service MDAs. Increased awareness and debate could have acted as a catalyst for improving public service delivery.

The commitment marginally changed government practices regarding access to information. The announcement of the 2015 Performance Contracts results, and a civil society consortium’s efforts to popularise the performance contracts, enabled the media and the general public to learn how different MDAs fared in their delivery of public services. For example, one newspaper highlighted the point that women-headed institutions tended to top the list of service delivery performance since the introduction of the performance contract scheme.⁸ Among them were the top two performers in 2015: the National Revenue Authority and the Environmental Protection Agency. According to civil society representatives involved in this commitment, the government’s announcements of the performance contracts assessment results increased access to information on public service delivery.

As implemented, this commitment did not create opportunities for public participation. The head of the PMSD told the researcher that the Directorate undertook further work to inform communities on performance contracts and to solicit community feedback. However, the researcher could not verify examples of such work at the time of this report.

CARRIED FORWARD?

The government did not carry this commitment forward. The majority of public institutions now sign performance contracts and publish the results annually of the assessment on service delivery to citizens. Publishing the results online so that they are permanently available can complete the commitment as originally envisaged.

¹ See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

² State House Communication Unit, “President Signs 2016 Performance Contracts with MDAs, SOEs,” (Cocorioko, 9 Aug. 2016), <http://cocorioko.net/president-signs-2016-performance-contracts--with-mdas-soes/>.

³ Every civil society member of the Steering Committee interviewed by the researcher was asked to give an opinion on the government position.

⁴ Head of PMSD, email to Charlie Hughes, 8 Nov. 2016.

⁵ Ibid.

⁶ John Momoh, Programme, Director, Mining and Extractives Programme, Network Movement for Justice and Development, interview by Charlie Hughes, 7 Nov. 2016. The Network Movement for Justice and Development is indicated in the action plan as the civil society organisation that would be involved with the commitment.

⁷ Governance Officer, Society for Democratic Initiatives, interview by Charlie Hughes, 1 Nov. 2016; Representative of Center for Accountability and Rule of Law, interview by Charlie Hughes, 10 Nov. 2016.

⁸ Assessment published in the Standard Times, 9 Aug. 2016.

4. Compliance with audit measures

Commitment Text:

The Audit Service Sierra Leone is the key institution that have championed the fight against reducing public wastage and promoting value for money across Government. However, there are still opportunities to strengthen the work of this institution in an effort to ensure more effective and transparent use of public resources.

Actions:

- White Paper prepared by the Executive that addresses key mechanisms and actions that Government intends to take to implement the recommendations of the annual Audit report with the view of reviewing recommendations.
- Policy paper to advice the Parliamentary Public Accounts Committee with regard to placing limitations on length of time their review and deliberations and the publishing of the audit report. This policy paper will be prepared by Open Government Partnership Sierra Leone National Steering Committee.
- At least 50% of the published Audit Report and/or PAC recommendations implemented by relevant MDAs and these actions made public during the annual performance contracting assessment process.

Responsible Institution: Strategy and Policy Unit and Open Government Initiative

Supporting Institution(s): Performance Management and Service delivery Directorate

Start Date: April 2014

End Date: June 2016

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		END OF TERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding		
4. Compliance with audit measures.			X		X						X			X				X					

COMMITMENT AIM

This commitment aimed to increase institutional compliance with the recommendations of the Audit Service and Parliament's Public Accounts Committee (PAC). The commitment called on the government to produce a white paper on implementation strategies recommended in the annual Audit report. It also urged the government to create a policy paper in partnership with the OGP Sierra Leone National Steering Committee to advise Parliament. Lastly, it required the government to implement at least 50% of the recommendations resulting from these initiatives and publish the resulting activities during the annual performance contracting assessment process.

STATUS

Midterm: Limited

The government made limited progress during the first half of the commitment's implementation. It had not started the requested White Paper on implementing audit recommendations. It began some work on drafting a policy paper to advise Parliament on a recommended timeframe for debating and publishing the auditor general's report. However, MDAs had yet to start implementing Audit Report recommendations or publishing results. For further information, please see Sierra Leone's IRM Mid-Term Report.¹

End of term: Limited

Based on the government's self-assessment report and the researcher's own findings, completion of the commitment activities remains limited. The government did not publish a White Paper detailing plans to implement current audit recommendations. Although the Performance Contracts of MDAs included addressing audit recommendations, the government self-assessment states that it implemented only 24.2% of the recommendations of the 2013 Auditor General's Report.² This figure falls short of the 50% target and uses an outdated report. The 2015 Auditor General's Report confirmed the slow uptake of implementing audit recommendations, stating "between 2011 and 2015, there were 959 recommendations of which 276 were implemented, 65 are a work in progress and 618 were not implemented."³ According to the government self-assessment report, the OGP National Steering Committee prepared the policy paper to review and amend the Government Budgeting and Accountability Act of 2005 and submitted it to both the Constitutional Review Committee and the House of Parliament. However, the policy proposal was not made public and the researcher was unable to verify its contents.

DID IT OPEN GOVERNMENT?

Access to information: Did not change

Implementing 50% or more Auditor General recommendations could have a transformative impact on fiscal transparency in Sierra Leone. However, this commitment saw minimal completion, and therefore the only progress achieved was the submission of a position paper by the Steering Committee to the Constitutional Review Committee (CRC). The IRM researcher is only aware of one demand made in the position paper, which recommended the new constitution require Parliament to debate the annual audit report within six months of its publication.⁴

CARRIED FORWARD?

This commitment was carried forward with modifications in the second action plan. It seeks to increase compliance with audit recommendations relating to public procurement. The researcher notes, however, that OGP's 50% target differs from the target the Audit Service has set for itself. According to the institution's Strategic Plan, the Audit Service aims to implement 37% of audit recommendations by 2020, which may be a more feasible target.⁵

¹ See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

² 2014 Auditor General's Report, xi, auditservice.gov.sl/download/ASSL_Strategic-plan-2016.pdf.

³ Audit Service Sierra Leone, Transmittal Letter, Dec. 2016 <http://www.auditservice.gov.sl/report/assl-auditor-general-annual-report-2015.pdf>.

⁴ Sierra Leone Open Government Partnership Steering Committee Position Paper to establish timeframe within which parliament shall produce a report on the auditor general report.

⁵ 2014 Auditor General's Report, auditservice.gov.sl/download/ASSL_Strategic-plan-2016.pdf.

★ 5. Single Treasury Account

Commitment Text:

It is evident that reducing wastage in the management of public resources is partially dependent on fiscal discipline and the leveraging of the extractive industry especially through the promoting of transparent practices in contract negotiation and management. The aim is to leverage on key actions that the Government has already identified as essential to improving fiscal and extractive industries transparency with a view towards better management of public resources such as the establishment of the Single Treasury Account which was highlighted in the 2014 Budget presentation by the Hon. Minister of Finance and Economic Development. Its establishment will streamline Government fiscal procedures and create more transparency and accountability in Government spending.

Actions:

- Single Treasury Account established by undertaking a census of all Government Bank accounts and findings made public.
- Procedures and mechanisms implemented by the Ministry of Finance and Economic Development in collaboration with relevant institutions will run a Single Treasury Account (STA) which will form the basis of a new Memorandum of Understanding with relevant Banks on the modus operandi of Government transactions based on Single Treasury Account Model.

Responsible Institution: Ministry of Finance and Economic Development

Supporting Institution(s): Open Government Initiative

Start Date: April 2014

End Date: June 2016

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		DID IT OPEN GOVERNMENT?					
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding	
★ 5. Single Treasury Account.			X		X									X								X

Editorial note: This commitment is clearly relevant to OGP values as written, has transformative potential impact, and is substantially or completely implemented and therefore qualifies as a starred commitment.

COMMITMENT AIM

This commitment aimed to establish one treasury account for all ministries, departments and agencies (MDAs). This could greatly improve financial accountability by eliminating the numerous accounts through which the government carries out financial transactions. Planned activities included conducting an assessment of all

government bank accounts and publishing the results before consolidating accounts under a single treasury account. Additionally, the commitment called on the Ministry of Finance and Economic Development to establish a memorandum of understanding with all relevant banks on new practice standards under the new Single Treasury Account Model.

STATUS

Midterm: Limited

As of June 2015, progress toward creating a single treasury account remained limited, though many positive steps were underway. The Ministry of Finance and Economic Development (MoFed) completed a census of all the bank accounts held by MDAs in early 2015.¹ By July 2015, MoFed created a database to maintain records of these accounts and the Governor of the Central Bank had directed commercial banks to submit balances for government accounts. Newspapers reported the number of bank accounts held by different government agencies, as uncovered by the MoFed assessment of public accounts.² However, Parliament had not yet passed the Public Financial Management Bill, which provides the legal basis for the single treasury account. For further information please see Sierra Leone's IRM Mid-Term Report.³

End of term: Substantial

Although not mentioned in the government's self-assessment report, the Public Financial Management Act, which provides the legal basis for the single treasury account, passed into law in 2016.⁴ In the period following July 2015, MoFed and the Central Bank linked their Information Communication Technology (ICT) platforms. The required single account software was installed and demonstrations were conducted. Further, MoFed signed memorandums of understanding (MOUs) with relevant banks, and established a relationship with 12 commercial banks to carry out the commitment.⁵ With technical assistance from the International Monetary Fund, MoFed and the Central Bank decided on the (successfully tested) Single Treasury Account model to be applied to all banking.⁶ The Accountant General's office says a single treasury account is not yet operational as regulatory and ICT support work continues.⁷

DID IT OPEN GOVERNMENT?

Access to information: Did not change

The existence of hundreds of MDA-operated bank accounts hindered transparent and accountable management of public finances. This commitment had the potential to transform fiscal practices in Sierra Leone by consolidating financial management under a single account system. The Accountant General's office states that although the single treasury account is not yet operational, the Ministry of Finance has improved the consolidation of government cash resources, revenues received, and payments.⁸ Unclassified information of the bank account census was submitted to OGP and was made public. However, apart from the number of bank accounts holding government funds, no further fiscal information arising from this commitment was disclosed to the public. While acknowledging the improvements claimed by the Accountant General's office, CSOs stated that access to government-held information has not changed. The establishment of the single treasury account, once it is finalized, will improve administrative processes within government. However, without disclosure of the single account's operations, access to information will not likely expand.

CARRIED FORWARD?

The government did not carry the commitment forward. The government is gradually consolidating the accounts of all agencies into the single treasury account as it concludes the remaining regulatory and ICT work. Once all agencies have become fully compliant and transitioned to the single account system, the commitment will be fully complete.

¹Treasury Single Account: Summary of Government Bank Accounts By Bank, (Accountant General's Department, 21 Mar. 2016), <http://bit.ly/1Nlukku>.

²The Concord Times, 22 Sept. 2015.

³See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

⁴The Public Financial Management Act, 2016, <http://mofed.gov.sl/PUBLICATIONS/Public%20Financial%20Management%20Act%202016.pdf>.

⁵Accountant General's Office, update on Treasury Single Account Implementation given to Charlie Hughes, 10 Nov. 2016.

⁶Ibid.

⁷Representative from the Deputy Accountant General, interview by Charlie Hughes, 10 Nov. 2016.

⁸Ibid.

6. Extractive Industry Revenue Act

Commitment Text:

The Extractives Industry Revenue is an Act that is required to regulate the management of revenue especially with reference to the granting of tax incentives to companies operating in Sierra Leone. Implementing the draft Extractives Industry Revenue Bill is crucial in that it would require the government to publish a statement of its tax expenditure, detailing all tax exemptions, the beneficiaries and revenue foregone in a bid to promote transparency. It will also require producing and publishing a cost benefit analysis on the need to grant tax incentive on an annual basis hence the public will be well informed on the rationale for granting tax incentives which may engender public debate and foster accountability and reduce the discretionary powers of Government officials. Recently, according to the National Revenue Authority over \$1 Billion in concessions were given to countries operating in Sierra Leone over a two year period.

Actions:

- Public consultations held on the Bill within a reasonable time frame.
- Bill tabled in Cabinet by Ministry of Finance and Economic Development.
- Bill tabled in Parliament.
- Bill passed by Parliament and enacted.

Responsible Institution: Ministry of Finance and Economic Development

Supporting Institution(s): Open Government Initiative

Start Date: April 2014

End Date: June 2016

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding
6. Extractive Industry Revenue Act				X	X	X					X	X						X			

COMMITMENT AIM

This commitment required the government to disclose tax expenditures to make the extractive sector transparent and accountable. Planned activities included passing the Extractives Industry Revenue Act in Parliament.

STATUS

Midterm: Not started

The Ministry of Finance and Economic Development (MoFed) prepared a draft Extractives Industry Revenue Bill in 2012 to manage mining revenues. The government held no public consultations on the draft bill. MoFed did not table the bill in Cabinet, and therefore progress stalled and it was never sent to Parliament for enactment. For further information, please see Sierra Leone's IRM Mid-Term Report.¹

End of term: Not started

MoFed has not made progress on this commitment. An official from MoFed confirmed that the Ministry has not taken action because the bill's text has yet to be finalized.² According to the government self-assessment report, the government incorporated into the Public Financial Management Act of 2016 some elements from the extractive revenue bill "especially targeted at reducing tax incentives." However, Part 6, entitled "Management of Extractives Industries Revenue," only establishes funds into which the government might deposit some mining sector revenue for specific investments and the benefit of future initiatives.³ The act does not address tax concessions, which was the crux of the Extractive Industry Revenue Act.

DID IT OPEN GOVERNMENT?

Access to information: Did not change

Civic participation: Did not change

Mining dominates Sierra Leone's economy, but the sector's contribution to government revenue remains small.⁴ One reason for this discrepancy is that the government grants generous tax concessions to individual mining companies through negotiated agreements.⁵ The Extractives Industry Revenue Act could ensure mining companies pay their fair share of taxes, thus improving the government's capacity to fund public services. Furthermore, the act would improve transparency by requiring companies to disclose tax concession information. The commitment did not contribute to any change in civic participation, as the government held no public consultations on the bill.

CARRIED FORWARD?

The next action plan does not include this commitment. CSO advocacy was the impetus behind the Extractive Industries Revenue Act. Since there remains no legal framework requiring government disclosure of lucrative tax concessions to the mining industry, and since the government reportedly no longer wishes to pass the law, civil society could continue to promote this issue until the government makes this sector more transparent.

¹See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

²Coordinator, Integrated Project Administration Unit, Ministry of Finance, interview by Charlie Hughes, 18 Oct. 2016.

³Public Financial Management Act, 2016, Supplement to the Sierra Leone Gazette Vol. CXLVII, No. 34, July 2016.

⁴Dan Watch, "Not Sharing the Loot: An investigation of tax payments and corporate structures in the mining industry in Sierra Leone," Oct. 2011, 3.

⁵Ibid. at 7.

7. Scaling up Extractive Industry Transparency Initiatives

Commitment Text:

In the area of transparency in the extractive industries, Sierra Leone has been a member of the Extractive Industry Transparency Initiative since 2008, and although it was suspended in 2012, she just recently became EITI-compliant. It is currently working on passing the EITI bill which has already been developed to improve efforts towards transparency and to ensure Sierra Leone's compliance. The non-disclosure of mining contracts has been an issue that has been raised by Civil Society organizations and the issue is valid as it will hold both government and the extractive Industries accountable.

Actions:

- EITI Bill tabled in Cabinet by the relevant MDA (Ministry of Mines and Mineral Resources or the Office of the Chief of Staff).
- EITI Bill passed by Parliament.
- Publish the process and outline the checks and balances carried out for allocation of licenses by the Mines and Mineral Resources Ministry and the Petroleum Directorate.
- Disclose environmental impact assessments prior to the award of any extractives rights.
- Perform audits and publish reports of the Diamond Area Community Development Fund and the Community Development Fund.

Responsible Institution: Ministry of Mines or the Office of the Chief of Staff

Supporting Institution(s): Parliament, EITI Secretariat, National Minerals Agency, National Revenue Authority, and Environmental Protection Agency

Start Date: April 2014

End Date: June 2015

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding
7. Scale up extractive industry transparency initiative.				X	X						X							X			

COMMITMENT AIM

This commitment aimed to have the Ministry of Finance prepare an Extractives Industry Revenue Bill for Parliamentary approval. In addition, the government was to publish the mining licence allocation process to highlight the procedural safeguards against corruption. Finally, the government committed to publish environmental impact assessments and audit reports of both the Diamond Area Community Development Fund and the Community Development Fund before awarding any extractive rights or licenses.

STATUS

Midterm: Limited

At the mid-term assessment, the Cabinet had not tabled the draft EITI bill for approval, and therefore Parliament has not passed it into law. Government and civil society officials confirmed that they conferred with the Law Officers department and agreed that a consultant must first prepare EITI policy to inform the final EITI draft bill. At the time of the mid-term IRM report, the government secured funding from the African Development Bank (AfDB) to hire a consultant to work on the policy. For further information, please see Sierra Leone's IRM Mid-Term Report.¹

End of term: Limited

The government has not taken the EITI bill to Cabinet or consequently submitted the bill to Parliament. Further action depends on the completion of the EITI policy. Prior to this commitment, the National Minerals Agency website (www.nma.gov.sl/home/mining-agreements) already made information on mining license allocation and environmental impact assessments available. The government did not audit additional assessments proposed in the commitment, including the Diamond Area Community Development Fund and the Community Development Funds as they never received funding. Both funds are within the Community Development Agreement through which large-scale mining companies contribute a portion of their profits to support development in the communities that host their operations. However, the government has yet to implement this Agreement in any of the major mining operations.

At the end of the commitment period, the government discontinued work on the completion of the EITI policy, reportedly due to SLEITI-facing funding issues due to "administrative problems faced by the AfDB".² In November 2016, after the implementation period passed, progress resumed when the government paid a consultant to continue developing the EITI policy.

DID IT OPEN GOVERNMENT?

Access to information: Did not change

One of the government's main priorities for the extractive sector is to ensure that mineral wealth, a key industry in Sierra Leone, supports economic and social development. To accomplish this task and prevent wastage of national income through corruption, the government has committed to transparency and accountability in the mineral sector.³ Passing the EITI bill and publishing information on the allocation of licenses and revenues can improve both these principles. This information could help citizens better assess how the extractive industry's revenue is allocated and whether communities benefit from the mineral sector.

Although Sierra Leone has neither developed nor passed the EITI policy into law, the country remains EITI compliant. This allows citizens to know the amounts and methods through which the government collects mineral sector revenue. The Mines and Minerals Act (2009), the Environmental Protection (Mines and Minerals) Regulations (2013) and related laws provide information on the process and safeguards involved in granting mining licenses. All mining lease agreements are available on the National Minerals Agency's website, and the government fully

discloses environment impact assessments. However, these activities predated the national action plan, and thus did not contribute to the implementation of this commitment. Therefore, this commitment did not change government practice.

CARRIED FORWARD?

The government did not carry this commitment forward. The Office of the President should continue to lead stronger implementation and enforcement of all EITI mechanisms while awaiting completion of the EITI policy and passage of EITI legislation.

¹See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

²Firstname Lastname (relevant position), email to Charlie Hughes, 18 Oct. 2016.

³The Agenda For Prosperity: Road to Middle Income Status, (The Government of Sierra Leone, 2013) 43, <http://sierra-leone.org/Agenda%204%20Prosperity.pdf>.

THEME 3 | CORPORATE ACCOUNTABILITY AND OPEN DATA FOR MINING

8. Local Content linkages with ministries, departments and agencies

Commitment Text:

The policy is necessary to ensure that there is sufficient linkage between the local economy and foreign enterprises. By setting specific performance requirements, the Government aims to ensure that the benefits that Sierra Leone seeks to obtain from foreign direct investment (FDI) including improved technology and managerial skills are integrated into the domestic market and networks. There are key facilitative commitments that are already prescribed by the Local Content policy such as the establishment of an implementing committee; however it is currently not functional. And for us to proceed effectively, it needs to become functional. Since key MDAs have a monitoring role to play it is important that they understand their roles and responsibilities to implement the Local Content policy. Moreover, MDAs should have collaborative meetings and share plans, revenue streams to enhance transparency and accountability.

Actions:

- Setting up of an MDA linkage mechanism (revival of the implementing committee) to inform the implementation and monitoring of the local content policy to ensure more efficient sharing of information across key implementing institutions facilitated.
- An audit of the implementation of the Local Content Policy to inform the development of a Local Content Bill to be undertaken.
- Local Content Bill tabled by Ministry of Trade and Industry in Cabinet.
- Local Content Bill discussed and ratified by Parliament and passed into law.

Responsible Institution: Ministry of Trade and Industry

Supporting Institution(s): Ministry of Labour and Social Security. Open Government Initiative

Start Date: April 2014

End Date: June 2015

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		DID IT OPEN GOVERNMENT?					
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding	
8. Local content policy linkages with MDAs.				X	Unclear						X				X					X		

COMMITMENT AIM

This commitment aimed to create standard practices to integrate benefits from Foreign Direct Investment (FDI) into domestic markets and networks. This policy supports capacity development by requiring foreign investors to hire and train local citizens.

The activities built on the existing Local Content Policy (2011) to establish an implementing committee, facilitate information sharing among government agencies, and set up a system to determine how local enterprises can institutionalize improvements from foreign investment. This commitment connects international enterprises to local content development in order to improve Sierra Leoneans' technological skills, create jobs, encourage the use of locally produced goods, and increase the rate of local ownership.

STATUS

Midterm: Substantial

A Local Content Committee was created to coordinate the implementation of the Local Content Policy within different state institutions. The committee consists of two members from civil society; the rest are from government agencies. While the Local Content Committee predates the action plan, officials of the Sierra Leone Local Content Unit (SLLCU) confirmed that during this period, the committee was ineffective and seldom met. The SLLCU states that, as a result of this commitment, the Local Content Committee now meets quarterly. In addition, SLLCU created a scorecard survey and collected information from 26 companies on a half-yearly basis in 2014, prior to the commitment period. The scorecard's results informed the drafting of the Local Content Bill. As of June 2015, the Ministry of Trade and Industry tabled the bill in Cabinet for Parliament approval. However, Parliament has yet to pass the bill into law. For further information please see Sierra Leone's IRM Mid-Term Report.¹

End of term: Completed

In March 2016, Parliament passed the Local Content Act, achieving the main goal of this commitment. The Local Content Act established the Sierra Leone Local Content Agency (SLLCA). According to SLLCA, the Local Content Committee continues to meet quarterly. At the time of this report, the SLLCA had concluded a second round of national consultations with businesses (the first was conducted before the commitment period). The Local Content Act requires businesses to periodically report their performance increasing use of local resources and employing local citizens.² At the time of this report, the SLLCA reported that ten companies had participated in both rounds of SLLCA consultations. These companies fully complied with their obligations to submit performance reports using the SLLCA's online platform.³ The reports detail each company's progress in procuring local materials and employing local workers, as well as the associated costs.⁴

DID IT OPEN GOVERNMENT?

Civic participation: Marginal

In the period between 2009 and 2013, Sierra Leone witnessed double digit Gross Domestic Product (GDP) growth.⁵ According to the government, real GDP was 6% in 2011, but reached an estimated 21.3% in 2012.⁶ Foreign direct investment in mining and agriculture spurred much of this economic growth.⁷ Seventy percent of the population in Sierra Leone depends on informal economic activities, particularly subsistence agriculture, and this commitment sought to improve the socioeconomic status of the population. The government has encouraged initiatives to ensure that citizens are consistently employed and paid real wages to reduce dependence on informal economic activities.

It is beyond OGP's scope to evaluate whether this commitment effectively changed the economic structure of the country. However, implementation resulted in some positive changes. For example, the commitment brought increased attention to citizens' participation in private sector economic activities associated with the GDP growth. Consultation with stakeholders and communities in developing and passing the Local Content Act marginally improved civic participation. In addition, this commitment improved business and NGO monitoring of policy compliance, allowing them to consult with the government via reports to the SLLCA.

CARRIED FORWARD?

The commitment was not carried forward to the second action plan.

¹See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

²The Local Content Act, 2016, §§ 63 and 64, <http://www.localcontent.sl/Sierra%20Leone%20Local%20Content%20Agency%20Act%202016.pdf>.

³Sierra Leone Local Content Agency, 14 Dec. 2016, <http://www.localcontent.sl/>.

⁴The Local Content Act, 2016, §§ 67 and 68.

⁵Government Budget and Statement of Economic and Financial Policies for the Financial Year 2013, 2012-2013 Parliament Session, Official Hansard Report 1, No. 5 (21 Dec. 2012) 7, <http://www.parliament.gov.sl/Portals/0/HANSARDS/21st%20December,%202012.pdf>.

⁶Government Budget and Statement of Economic and Financial Policies for the Financial Year 2013, 2012-2013 Parliament Session, Official Hansard Report 1, No. 5 (21 Dec. 2012) 7, <http://www.parliament.gov.sl/Portals/0/HANSARDS/21st%20December,%202012.pdf>.

⁷Ibid.

9. Publish and revise 70% of mining and agricultural lease agreements and contracts

Commitment Text:

Currently, not all mining and agribusiness agreements and contracts are accessible documents vis-à-vis Government online repositories. Following the preparation of the 2011 EITI report, a gap analysis was undertaken by Government institutions in collaboration with Civil Society organizations and one of the key areas of concern was the revision of contracts and making these documents public. While significant progress has been made on the revision of key mining contracts, some work is still required on making lease agreements and contracts public in an effort to promote transparency and encourage civic participation in the debate and execution of mining contracts. This commitment will create more access points for the public to these documents to engender national debate. Similar issues lie around agribusiness contracts and the level of concern is similar to that of mining companies.

Actions:

- 70% of mining and agricultural contracts published on the yet to be established open data portal, in addition to the websites of the Ministry of Finance and Economic Development, National Minerals Agency and Ministry of Agriculture, Forestry and Food Security.
- Publish processes and outline the checks and balances carried out for allocation of licenses by the Ministry of Mines and Mineral Resources and the Petroleum Directorate.
- A yearly symposium held of private sector partners, relevant communities, Government and Civil Society organizations to discuss the state of contract execution.
- Public discussions held on all new mining licenses and agribusiness contracts before they are signed by Government with relevant documentation prepared for public dissemination by the Ministry of Mines and Mineral Resources and Ministry of Agriculture, Forestry and Food Security.
- Participating companies make public their Corporate Social Responsibility (CSR) policies and yearly Work Plan (online posting a minimum) to facilitate operation of the Community Development Agreement and ascertained by the Strategy and Policy Unit. Adherence monitored by the National Minerals Agency in a yearly assessment of the respective work plans of the participating Companies.

Responsible Institution: Ministry of Information and Communication

Supporting Institution(s): Ministry of Finance and Economic Development. National Minerals Agency

Start Date: June 2014

End Date: June 2015

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	END OF TERM		Worsened	Did not change	Marginal	Major	Outstanding
															Substantial	Completed					
9. Publish and revise 70% of mining and agricultural contracts.				X	X					X				X				X			

COMMITMENT AIM

This commitment aimed to improve access to information on mining and corporate agricultural investments such as mining licenses and land leases. It required the government to publish 70% of mining and agricultural contracts on government websites and on a new open data portal. The commitment also called for the government to hold a symposium for stakeholders, and publish policies and information related to the allocation of mining and agricultural licenses.

This commitment addresses two contentious areas. First, mining lease agreements negotiated and ratified during the commodity boom of the 2000's were not in the national interest and needed renegotiation. Secondly, government neglected of agribusiness caused issues involving large-scale land acquisition for non-food agricultural activities, such as plantations. This type of land-use has serious consequences in Sierra Leone where subsistence farming sustains the vast majority of the population. This commitment seeks to increase transparency by publishing information about mining and agriculture.

STATUS

Midterm: Limited

This commitment saw limited completion as of June 2015. Prior to this commitment, the National Minerals Agency's (NMA's) website (www.nma.gov.sl/home/mining-agreements) regularly published mining agreements between the government and companies after the NMA had already granted the license. However, despite progress in mining, the Petroleum Directorate did not have a website and had not published the licensing processes or procedural safeguards. Furthermore, the government did not hold a symposium in 2015 to discuss the extractive sector among government, private sector, civil society, and community representatives. Additionally, the government did not sign any new agribusiness land leases during the first half of the implementation period due to the Ebola crisis, so government practice in holding public discussions before signing new lease agreements was impossible to evaluate.¹ Finally, no mining companies or large-scale agribusinesses published their Corporate Social Responsibility (CSR) policies or work plans. For further information, please see Sierra Leone's IRM Mid-Term Report.²

End of term: Limited

As of June 2016, the government had reviewed its agreements with all five license-holding mining companies in Sierra Leone. The government publishes the findings on the NMA's website.³ However, the government did not negotiate any large-scale agricultural business agreements during the implementation period, and therefore it is unclear whether future negotiations will employ the transparency measures proposed in this commitment. Based on the government self-assessment report, the government did not hold annual symposiums to discuss contracts. According to the self-assessment, the government no longer needed to hold public discussions on new mining and agricultural contracts before it signed them. The government self-assessment report also found limited progress on companies publishing their CSR policies and annual work plans. The researcher could find no mining company in the country that published its CSR policy or work plan. Also, since the mid-term review, agribusinesses had not made progress in creating a CSR framework similar to the Community Development Agreement (CDA) process in the mining sector.

Acknowledging the reluctance of mining companies to disclose their CSR policies and annual work plans to inform community development, the government requested company compliance with an alternative CDA process. At the conclusion of the assessment period, however, no mining company had entered into a CDA with a host community.

DID IT OPEN GOVERNMENT?

Access to information: Did not change

While increased investment in mining and large-scale agribusiness spurred economic growth in Sierra Leone, weak regulation of the extractives sector has led to lost revenue for the government and host communities.⁴ CSR policies and work plans envisioned by this commitment called for the re-negotiation of existing mining agreements and required companies to contribute to the development of their host communities. However, due to limited completion of the commitment activities, this commitment improved neither access to information nor civic participation.

Civil society organisations involved in the mineral sector say that some information is accessible due to practices that pre-date the action plan. Putting CSR policies and work plans online would disclose new information on large-scale agribusinesses and mining companies. However, CSR information was not made public, and many companies remain unwilling to release CSR policies and annual work plans.

CARRIED FORWARD?

The government has not carried this commitment forward. However, two large-scale mining companies indicated that they would begin work on funding community development through the CDA framework,⁵ indicating there may be further opportunities to complete the commitment.

¹ See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

² Ibid.

³ "Mining Agreements," (National Minerals Agency, 2016), <http://www.nma.gov.sl/home/%20mining-agreements/>.

⁴ DanWatch, *supra*; Richard Fanthorpe and Christopher Gabelle, *Political Economy of Extractives Governance in Sierra Leone*, 2013; Christian Aid, *Who is benefitting? The social and economic impact of three large-scale land investments in Sierra Leone: a cost-benefit analysis*, 2013.

⁵ Resource Governance Project officer at the Sierra Leone Office of the German International Cooperation, interview by Charlie Hughes, 14 Oct. 2016.

★ 10. The Right to Access Information

Commitment Text:

The Right to Access Information Act was passed in October, 2013 as part of Government’s response to a clarion call to improve transparency across Government by making information readily available and accessible. Government has worked collaboratively with Civil Society and donor partners to develop the Right to Access Information Act and implementation has leveraged on support from partners; however we need to put pressure to ensure full implementation. Government of Sierra Leone is vested in ensuring that the Right to Access Information tenets take root in Sierra Leone and engender greater transparency in Government wide transactions. Some training has been undertaken of Information Officers and a Right to Access Information Act implementation readiness assessment is currently underway but the process needs to be supported and nurtured to achieve the desired results.

Actions:

- Regulations to implement the Right to Access Information Act developed.
- 250 public information officers in 13 Districts within the first year of implementation trained.
- Public sensitization campaigns launched for both Government and non-government users.
- Public Information Commission established with Commissioner(s) identified.

Responsible Institution: Ministry of Information and Communication

Supporting Institution(s): Open Government Initiative

Start Date: April 2014

End Date: June 2016

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	END OF TERM		Worsened	Did not change	Marginal	Major	Outstanding
															Substantial	Completed					
★ 10. Right to access information.			X		X		X				X		X				X				

Editorial note: This commitment is clearly relevant to OGP values as written, has transformative potential impact, and is substantially or completely implemented and therefore qualifies as a starred commitment.

COMMITMENT AIM

This commitment aimed to implement the Right to Access Information (RAI) Act passed in 2013. The RAI Act established the Right to Access Information Commission (RAI Commission) with the principal responsibility to implement a freedom of information regime in Sierra Leone. This commitment required the creation of regulations to fully implement all provisions of the RAI Act, including training 250 public information officers in 13

districts, launching a public awareness campaign, and establishing a public information commission and commissioner.

STATUS

Midterm: Limited

As of June 2015, the President nominated right-to-access-information commissioners and Parliament approved their appointments. Additionally, the Society for Democratic Initiatives (SDI), a CSO, led a coalition to implement the freedom of information law. SDI developed and submitted draft regulations to the Ministries of Information and Communication for implementing of the RAI Act. As of June 2015, SDI had begun working with the new RAI Commission to finalize the regulations for submission to Cabinet. However, although the RAI Commission was responsible for training public information officers, only SDI completed the training activities, conducting a two-day class to train 50 PIOs.

The RAI Commission engaged in limited campaigns to educate citizens about the RAI Act and made a few radio and television announcements to inform citizens about freedom of information policies. The RAI commission also developed a public education and communication strategy, but it was not implemented due to insufficient funds.¹ For further information, please see Sierra Leone's IRM Mid-Term Report.²

End of term: Substantial

According to the government's self-assessment report and the researcher's own findings, all activities saw substantial progress in the second half of the assessment period. According to the Executive Secretary of the RAI Commission, the Commission finalised the regulations for implementing the RAI Act by the end of 2015. However, the Chairman of the RAI Commission has yet to present the regulations to Parliament for ratification, although he indicated this would be completed in 2017. Training public information officials continued. In August 2015, the RAI Commission trained 47 MDA officials. In October 2015, the SDI trained over 50 Public Information Officers.³ According to SDI's Governance Officer, SDI trained another 25 PIOs in 2016.⁴ By the end of the assessment period, the RAI Commission and SDI trained a total of 122 Public Information Officers.

Since the midpoint of the implementation period, the RAI continued to grow in staffing, adding 14 additional personnel. After June 2015, the RAI undertook different activities to inform and educate the public about its work and the RAI Act, including radio and television discussion programmes and public announcements. On 21-22 April 2016, the RAI Commission held a "datafest" as a public education and awareness outreach campaign.

DID IT OPEN GOVERNMENT?

Access to information: Did not change

The commitment had the potential to improve accessibility of public information for citizens. Additionally, it might have improved accountability and transparency in interactions between citizens and government institutions by providing better access to official information through trained information officers. However, the commitment did not change public access to information, as the relevant regulations have not come into effect. Absent these regulations, members of the public who seek official information from government institutions must still rely on personal contacts and favours. CSOs involved with access to information emphasized this issue when stating that the commitment has not led to changes in practice.⁵

CARRIED FORWARD?

This commitment was not carried forward. According to the OGP Coordinator, the commitment's implementation reached a stage where further OGP involvement was no longer needed. In order to complete the commitment, the

RAI Commission should assess the number of Public Information Officers that have been trained, including their places of deployment and the content of their training. The Steering Committee should urge the RAI Commission to commit to a firm date by which it will submit the regulations to Parliament in 2017. Once Parliament passes the regulations, the RAI Commission and SDI should lead a publicity campaign to educate citizens about freedom of information rights.

¹See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

²Ibid.

³Government End-of-Term self assessment report 2014-2016: <https://www.opengovpartnership.org/country/sierra-leone/assessment>.

⁴Governance Officer, Society for Democratic Initiatives, interview by Charlie Hughes, 1 Nov. 2016.

⁵Ibid.; Director of Society for Knowledge Management, interview by Charlie Hughes, 13 Nov. 2016.

11. Open Data Portal

Commitment Text:

The Government of Sierra Leone has made commitment to participate in the Open Government Partnership in order to increase transparency and accountability, and at the same time help in the fight against corruption.

Building on our progress to date with other initiatives, Sierra Leone continues its efforts to expand access to government data from government ministries, departments and agencies. Today, we do not have such a website that is fully functional with open government data even though we have a website named Transparency Sierra Leone that has not met its objectives. This past October, Sierra Leone announced its intent and commitment to become a member in the Open Government Partnership whose strategy is grounded on information technology as the primary medium to open government.

Actions:

- Open data readiness assessment completed in collaboration with development partners.
- Experts on the design of an open data portal with development partners and Non-Governmental Organizations engaged.
- Source funding to establish a data portal for pilot Government documents such as budget, 70% of mining and agricultural contracts and 20% of Laws of Sierra Leone that have been gazetted.

Responsible Institution: Ministry of Information and Communication

Supporting Institution(s): Open Government Initiative. Millennium Challenge Corporation Coordinating Unit

Start Date: April 2014

End Date: June 2016

COMMITMENT OVERVIEW	SPECIFICITY				OGP VALUE RELEVANCE (as written)				POTENTIAL IMPACT				COMPLETION		MIDTERM		END OF TERM		DID IT OPEN GOVERNMENT?				
	None	Low	Medium	High	Access to Information	Civic participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Completed	Worsened	Did not change	Marginal	Major	Outstanding		
11. Open Data portal				X	X	X	X			X				X						X			

COMMITMENT AIM

This commitment aimed to establish an open data portal to improve citizen access to government information. The government planned to complete an "open data readiness assessment" in collaboration with development partners and to work with NGO experts to design the portal. Documents to be published on the portal included budget information, 70% of mining and agricultural contracts, and 20% of gazetted laws in Sierra Leone.

STATUS

Midterm: Limited

The open data portal intended to support proactive disclosure of information by government institutions, in line with the Right to Access to Information Act of 2013. The World Bank approved funding for the open data portal. However, the Ebola outbreak delayed the open data portal readiness assessment. The government primarily used the website to publish data on the Ebola virus instead of uploading documents envisaged in the commitment, such as the annual national budget, mining contracts, leases for commercial agricultural lands and laws of Sierra Leone. For further information, please see Sierra Leone's IRM Mid-Term Report.¹

End of term: Substantial

Based on the government's self-assessment report, a World Bank Mission to Sierra Leone trained key personnel in the Millennium Challenge Corporation Unit, the RAI Commission, the Ministry of Information and Communication (MIC) and OGI in August 2015. In November 2015, a newspaper reported that officials from the World Bank's Open Aid Partnership concluded a twelve-day visit to Sierra Leone to assess open data readiness. During the visit, the team held approximately 40 focus group discussions on the open data portal with government agencies, civil society organisations, academic institutions, and the private sector.² The activities of the World Bank team during this visit fulfilled both the commitment's pledge to conduct an open data readiness assessment and the engagement of critical stakeholders.

After the mid-term assessment, the hosting and management of the open data portal moved from the RAI Commission to the OGI. According to RAI Commission officials the IRM researcher spoke with, OGI initiated the move without valid reasons. However, the OGP Coordinator explained to the researcher that OGI made the move to better manage the open data portal.³ According to the Coordinator, a key reason for the RAI Commission's unsatisfactory management of the open data portal was that OGI is better suited to urge government agencies to upload contents to the portal.⁴ According to the Executive Secretary of the RAI Commission, the country office of the World Bank has been working with both OGI and the RAI Commission so that the commission might regain control of the open data portal.⁵ Returning management of the open data portal to the RAI Commission is important because the open data portal partly fulfills the proactive information disclosure component of the Right to Access Information Act.

The commitment sought to publish 70% of mining and agricultural contracts and 20% of the Sierra Leonean laws on the open data portal. However, the government did not meet these targets by the end of the assessment period, although the information is available on the government's Mining and Natural Resource website and in the national gazette of laws.

DID IT OPEN GOVERNMENT?

Access to information: Marginal

Civic participation: Marginal

The absence of policies or laws requiring MDAs to proactively disclose official information contributed to an environment of limited access to official information. This commitment could improve access to information for citizens, however this potential was limited as this was the first time that the government facilitated a specific platform for official information disclosure. The commitment achieved marginal improvements for civic participation as the World Bank held approximately 40 focus group discussions between government agencies, CSOs, academic institutions, and the private sector regarding open data readiness.

CARRIED FORWARD?

The government did not carry this commitment forward. According to the OGP Coordinator, this commitment was completed and any remaining issues could be addressed as administrative matters. At the time of this report, dialogue continued between the RAI Commission, MIC, OGP and the World Bank's in-country office to return management of the open data portal to the RAI commission. According to the Executive Secretary, the RAI Commission will activate the open data portal once OGI returns it to the Commission.

¹See the Sierra Leone IRM Mid-Term report for more details. Charlie Hughes, Independent Reporting Mechanism (IRM): Sierra Leone Progress Report 2014-2015, (Open Government Partnership, 2015), https://www.opengovpartnership.org/sites/default/files/OG_SierraLeone_2016_final.pdf.

²Article published in the Standard Times, 24 Nov. 2015.

³<http://opendata.gov.sl/>.

⁴OGP Coordinator, interview by Charlie Hughes, 14 Nov. 2016.

⁵Executive Secretary of the RAI Commission, interview by Charlie Hughes, 14 Oct. 2016.

METHODOLOGICAL NOTE

Commitments are clustered based on the original action plan. This report is based on a desk review of government programmes, laws and regulations that are either in draft form or have been passed, the government self-assessment reports, media reports, analysis of the commitments, and monitoring implementation of the second action plan. The IRM researcher also conducted in-person interviews and written consultations with relevant government ministries, departments and agencies, and civil society organisations.



Charlie J. Hughes is an independent consultant. His main fields of interest are civil society, corruption and accountability, local government, democracy building, and elections.

Open
Government
Partnership

INDEPENDENT
REPORTING MECHANISM

Open Government Partnership (OGP) aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.



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