

# Independent Reporting Mechanism (IRM): Sierra Leone Transitional Results Report 2019–2021

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This report was prepared in collaboration with María Emilia Mamberti and Eva Okoth, independent researchers.

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## I. Introduction

The Open Government Partnership is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Action plan commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate an entirely new area. OGP's Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Civil society and government leaders use the evaluations to reflect on their progress and determine if efforts have impacted people's lives.

The IRM has partnered with Maria Emilia Mamberti and Eva Okoth to carry out this evaluation. The IRM aims to inform ongoing dialogue around the development and implementation of future commitments. For a full description of the IRM's methodology, please visit <https://www.opengovpartnership.org/about/independent-reporting-mechanism>.

This report covers the implementation of Sierra Leone's third action plan for 2019-2021. In 2021, the IRM will implement a new approach to its research process and the scope of its reporting on action plans, approved by the IRM Refresh.<sup>1</sup> The IRM adjusted its Implementation Reports for 2018-2020 action plans to fit the transition process to the new IRM products and enable the IRM to adjust its workflow in light of the COVID-19 pandemic's effects on OGP country processes.

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<sup>1</sup> For more information, see <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>

## II. Action Plan Implementation

The IRM Transitional Results Report assesses the status of the action plan's commitments and the results from their implementation at the end of the action plan cycle. This report does not re-visit the assessments for "Verifiability," "Relevance" or "Potential Impact." The IRM assesses those three indicators in IRM Design Reports. For more details on each indicator, please see Annex I in this report.

### 2.1. General Highlights and Results

Sierra Leone showed moderate progress in the implementation of its third action plan during the period between August 2019 and August 2021. Four commitments were substantially implemented (commitments 5, 6, 7, and 8) and resulted in positive changes in open government. However, three commitments only achieved limited implementation (commitments 1, 2, and 4), and there is no available evidence regarding the implementation of Commitment 3 on tax benefits. This represents marginal progress as compared with the implementation of Sierra Leone's previous action plan, for which the country showed substantial or full implementation of only two of its ten commitments, while the rest were limited or had not been started.

This report focuses its analysis on the open government early results for three commitments (commitments 5, 6 and 7), all of which the IRM reported to be noteworthy due to the ambition of its activities and were substantially completed during the two-year action plan implementation cycle. However, within this same implementation timeframe, the commitments only achieved marginal results in terms of opening the government.

According to the research conducted for this report, factors that contributed to positive progress in implementation of some commitments include sustained political support throughout the action plan timeframe and close engagement with civil society organizations working on a given policy area. Factors that hindered implementation include staff turnover in government, the wide variety of milestones included under some commitments, lack of coordination among different areas of governments, low participation of high-ranking authorities in relevant spaces, lack of budgetary allocations and de-prioritization of commitments, and the absence of analysis of the feasibility (e.g., the financial viability) of commitments and on how different milestones interact with each other.

Challenges to implementation have been particularly noticeable regarding Commitment 4 on beneficial ownership transparency, which was initially coded as noteworthy but around which only very limited progress was made. As a starting point, the government reduced the scope of the commitment to only include extractive sector companies rather than all companies, to which it had already committed under another framework (the "EITI Initiative"), arguing lack of logistical and financial capacity. The government also considered that the commitment had design flaws, stating that there were problems with the logic of some of the commitment's milestones and understanding that without an amendment in legislation (which it had not managed to achieve at the time of writing this report), other milestones could not be pursued.

Where implementing agencies managed to overcome the described challenges, completion of commitment milestones led to important changes in open government practice. Overall, the IRM found that commitments that yielded better results:

- Almost always relied on close collaboration and cooperation with civil society organizations and other stakeholders, and in some cases showed successful coordination among different areas of government. This was the case for

Commitment 6 on gender, for which members of parliament helped support discussions around a bill developed by the executive under its OGP commitments.

- Already counted with preexisting interest and mobilization (as well as funding and political support) around the issues addressed by a commitment or milestone (for instance, around the sustainable development goals).
- Were designed with concrete and feasible milestones that could be achieved within the two-year implementation cycle. These milestones tend to clearly lay out the outputs and outcomes expected and frame them within a broader strategy.

As a result of positive advancements, consultation and validation meetings with stakeholders have been consolidated as a good practice and routine procedure, providing relevant channels for citizens' feedback and participation. More information on government has been created, although not always made fully accessible to the public. OGP actions have helped to create awareness on the substantive issues in the action plan.

Finally, it is worth noticing that there was insufficient public information on implementation of Sierra Leone's action plan and its results. Although the country has a website dedicated to the OGP process, there is no evidence on the repository to account for the implementation of any commitment<sup>2</sup>. Therefore, the IRM found that the country acted contrary to process (see Section 3.2 for more information). The country did not publish a self-assessment report.

## 2.2. COVID-19 Pandemic Impact on Implementation

The COVID-19 pandemic affected roughly two-thirds of the implementation time of Sierra Leone's third national action plan. Due to the pandemic, the work of OGP's multi-stakeholder forum had to be paused for some months, then moved to a virtual format. While valuable, remote participation has proven challenging due to lack of digital culture and internet access in many parts of the country, including within the government. The fact that Sierra Leone does not publish information on commitments' implementation on an online repository makes virtual work even harder.

Furthermore, COVID-19's impact on the economy negatively affected implementation of some commitments, especially those that entailed creating new entities with significant financial costs, such as Commitment 1. Sierra Leone's fiscal deficit almost doubled in 2020, because of concurring revenue shortfalls (stemming from restrictions that impacted agriculture, mining, and services) and spending increases to support the pandemic response<sup>3</sup>. However, COVID-19 also brought opportunities to apply OGP values. For instance, the National COVID-19 Emergency Operations Center partnered with data science organizations to produce population and infrastructure data to enhance the government's response to the pandemic.<sup>4</sup> Moreover, an International Budget Partnership survey found that the government offered some transparency around COVID-19 emergency funding.<sup>5</sup>

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<sup>2</sup> See <https://www.nacced.gov.sl/ogp-repository/>, accessed February 17, 2022.

<sup>3</sup> See World Bank, "Sierra Leone's Economy is Recovering from COVID-19 Contraction Although Uncertainties Persist," <https://www.worldbank.org/en/news/press-release/2021/08/05/sierra-leone-s-economy-is-recovering-from-covid-19-contraction-although-uncertainties-persists>.

<sup>4</sup> For a general reference, see <https://www.data4sdgs.org/news/press-release-sierra-leone-fights-covid-19-using-innovative-geospatial-data-and-technology>.

<sup>5</sup> 2021 COVID Module Country Dataset. "Sierra Leone." <https://internationalbudget.org/covid/>.

## 2.3. Early Results

The IRM acknowledges that results may not be visible within the two-year timeframe of the action plan and that at least a substantial level of completion is required to assess early results. For the purpose of the Transitional Results Report, the IRM will use the “**Did it Open Government?**” (DIOG) indicator to highlight early results based on the changes to government practice in areas relevant to OGP values.

Section 2.3 focuses on outcomes from the implementation of commitments that had an ambitious or strong design, per the IRM Design Report assessment, or that may have lacked clarity and/or ambition but had successful implementation with “major” or “outstanding” changes to government practice.<sup>6</sup> Commitments considered for analysis in this section had at least a “substantial” level of implementation, as assessed by the IRM in Section 2.4.<sup>7</sup> While this section provides the analysis of the IRM’s findings for the commitments that meet the criteria described above, Section 2.4 includes an overview of the level of completion for all the commitments in the action plan.

<b>Commitment 5: Access to Information</b>	
<b>Aim of the commitment</b>	<p>This commitment sought to increase “proactive disclosure of information held by public authorities, [improve] access to information for women and girls, [timely report] on the sustainable development goals indicators and the national agenda through open data, [and enhance] effectiveness of public institutions by strengthening the whole of government and multiple stakeholders.”<sup>8</sup></p> <p>Specifically, this commitment aimed to enhance the capacity of public institutions and the society to identify, publish, and disseminate useful information. While an access to information law exists, it is not expansive and responsive enough to meet the needs of Sierra Leoneans. If achieved, the commitment would support the advancement of a robust and effective access to information regime.</p> <p>The commitment also aimed to address the most pressing social needs and improve the effectiveness of government institutions, such as mismanagement or waste of public resources, lack of accountability, and gender inclusivity—as well as empowerment of women. Adequate, relevant, and useful information available to the government promises to contribute to solving these challenges.</p> <p>Since 2013, Sierra Leone has had a Right to Access Information Act that governs all public authorities and includes provisions on proactive disclosure. The country had its Right to Access Information Commission (RAIC) established in 2014. In 2018 and 2019, 10 ministries, departments, and agencies were targeted to produce publication</p>

<sup>6</sup> IRM Design Reports identified strong commitments as “noteworthy commitments” if they were assessed as verifiable, relevant, and “transformative” potential impact. If no commitments met the potential impact threshold, the IRM selected noteworthy commitments from the commitments with “moderate” potential impact. For the list of Sierra Leone’s noteworthy commitments, see the Executive Summary of the 2019-2021 IRM Design Report: <https://www.opengovpartnership.org/documents/sierra-leone-design-report-2019-2021/>.

<sup>7</sup> The following commitments assessed as noteworthy in Sierra Leone’s IRM Design Report are not included in this section because their limited implementation means there is not enough progress to assess results: Commitment 4: Beneficial Ownership Information.

<sup>8</sup> See Sierra Leone’s Third Action Plan, <https://www.opengovpartnership.org/members/sierra-leone/>.

	<p>schemes, including “Statistics Sierra Leone.” Despite legal provisions and discrete targeted actions, proactive disclosure of government-held information was still limited at the time of creating this commitment.<sup>9</sup> Furthermore, women were often excluded from the flow of information due to a lack of sex-disaggregated data, among other factors.<sup>10</sup></p> <p>This commitment was evaluated to be a positive but minor step towards greater access to information, given that many of the envisioned milestones were already in place at the time the commitment was adopted. Sierra Leone had already established an Open Data Council, completed an Open Data Readiness Assessment, and acceded to the International Open Data Charter. The remaining milestones sought to expand the number of ministries, departments, and agencies (MDAs) proactively disclosing information. Moreover, the commitment missed an opportunity to incorporate citizen engagement—particularly with women and girls—in implementation.<sup>11</sup></p>
<p><b>Did it open government?</b></p> <p><b>Marginal</b></p>	<p>Sierra Leone substantially completed the implementation of milestones associated with this commitment. However, implementation led to only marginal changes in access to information.</p> <p>To complete Milestone 1, the Right to Access Information Commission (RAIC) committed to preparing annual and special reports on women’s right of access to information. The RAIC launched its 2019-2020 annual report, which “encapsulates the work of RAIC spanning from the commencement of operation of this current Commission in December 2018 onto December 2019.”<sup>12</sup> However, the report does not include information specific to gender or women’s access to information. After conducting online desk research and stakeholder interviews, the IRM did not find evidence on the publication of a gender-specific report.<sup>13</sup></p> <p>The RAIC conducted relevant work on proactive disclosure of information (Milestone 2), such as holding countrywide events,<sup>14</sup> supporting five MDAs in presenting new datasets in an ad hoc conference as part of a pilot plan<sup>15</sup> and carrying out an assessment on proactive publication of information.<sup>16</sup> Although RAIC published articles stating that MDAs presented inventories of datasets, the IRM found no evidence to suggest that these datasets were made public, after reviewing the relevant open data portal and RAIC’s website. There was no information on other MDAs following initial pilot actions to reach the 20 MDAs’ goal included in the commitment.</p>

<sup>9</sup> See Sierra Leone Design Report 2019-2021, <https://www.opengovpartnership.org/documents/sierra-leone-design-report-2019-2021/>.

<sup>10</sup> Idem.

<sup>11</sup> Idem.

<sup>12</sup> See Page 4 of the report available at RAIC’s website, available at <https://raic.gov.sl/images/raic-Annual-report-2019-2020-print-d2.pdf>, accessed March 11, 2022.

<sup>13</sup> In addition to conducting extensive desk research, the IRM discussed implementation of this commitment with Hannah (Hamida) Jimmy, government contact person and member of OGP’s Steering Committee, and tried contacting Mrs. Yeama Thompson in different opportunities, although no further information was provided.

<sup>14</sup> See activity reported by RAIC at <https://raic.gov.sl/index.php/en/pdi/36-staff/211-pdi-regions> (last accessed March 11, 2022).

<sup>15</sup> See activity reported by RAIC at <https://raic.gov.sl/index.php/en/society-culture-2/220-raic-world-bank-consultant-presents-findings-of-an-assessment-on-proactive-publication-of-information-2>, accessed March 11, 2022.

<sup>16</sup> See activity posted on RAIC’s Facebook page, <https://www.facebook.com/Right-to-Access-Information-Commission-RAIC-109400544182090/>, accessed March 11, 2022.

RAIC held trainings and engagements on quality data production and on the Right to Information Act,<sup>17</sup> and it identified public information officers in different ministries (Milestone 4).<sup>18</sup> According to a 2021 RAIC report, the Commission organized a three-day training for public information officers in November 2019. The training built public information officers' capacity in disciplines involving information-request handling, records management, proactive disclosure, information-access limitations, and national and international instruments for access to information. At the training, the public information officers asked questions regarding their roles, responsibilities, and limitations.<sup>19</sup> Some public authorities appointed public information officers, while others continue to use public relations officers to carry out the combined responsibilities following the trainings.<sup>20</sup> RIAC determined that out of 20 MDAs, 15 have public information officers, while 5 reported that they do not.<sup>21</sup>

In terms of open data efforts, the government continues to maintain an open data portal, although very few datasets have been updated during the timeframe of the action plan.<sup>22</sup> Furthermore, there is still no gender or women's/girls' category among datasets, although a few sets are relevant for women's and girl's rights (e.g., those on reproductive health). Regarding data accessibility, it is worth noting the creation of a portal that integrates geo-referenced data sets from different areas of government,<sup>23</sup> an app to visualize data launched in 2020,<sup>24</sup> and the government's active use of data in response to the COVID-19 pandemic.<sup>25</sup>

Activities carried out under this commitment represented positive but incremental improvements that led to marginal changes from the existing baseline at the time the commitment was designed. Very little information was made accessible to the public as a result of implementation. New information consisted centrally of RAIC's annual report, which is a relevant first step on the road to accountability but about which dissemination efforts are not clear. Moreover, the quality of existing data seems to have remained unaltered in terms of the update of datasets and the capacity to disaggregate data by gender.

No barriers appear to have been removed for women's access to information, and the engagement of women and women's rights organizations specifically around the commitment appears low. RAIC did engage different stakeholders, including non-state actors, in many of its actions. This is a relevant example of an approach by which to seek

<sup>17</sup> See activity posted on RAIC's Facebook page, <https://www.facebook.com/Right-to-Access-Information-Commission-Commission-RAIC-109400544182090/>, last accessed March 11, 2022.

<sup>18</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP's Steering Committee.

<sup>19</sup> RAIC, "RAIC Compliance Assessment Report: Sierra Leone Voluntary National Review (VNR) Report on the SDGs", 2021, <http://raic.gov.sl/images/downloads/Compliance-Assessment-Report.pdf>.

<sup>20</sup> RAIC, "RAIC Compliance Assessment Report: Sierra Leone Voluntary National Review (VNR) Report on the SDGs", 2021, <http://raic.gov.sl/images/downloads/Compliance-Assessment-Report.pdf>, Page 31.

<sup>21</sup> Ibid.

<sup>22</sup> See <https://opendata.sl.gov.sl/search/type/dataset>, accessed March 11, 2022. [Note: This link was no longer functional at the time this report was being finalized in August 2022]

<sup>23</sup> See <https://gis.dsti.gov.sl/>, accessed March 11, 2022.

<sup>24</sup> The app is available for download at [https://play.google.com/store/apps/details?id=org.communitysystemsfoundation.sierraleoneinfo&hl=en\\_CA](https://play.google.com/store/apps/details?id=org.communitysystemsfoundation.sierraleoneinfo&hl=en_CA).

<sup>25</sup> For a reference, see <https://www.data4sdgs.org/news/press-release-sierra-leone-fights-covid-19-using-innovative-geospatial-data-and-technology>, accessed March 11, 2022.

	<p>citizen feedback that could be enhanced and systematized in the future. Importantly, some of the engagement activities were carried out in all regions of the country, providing a good model for inclusive participation.</p> <p>The wide range of milestones included under the commitment can help explain the discrete impact it had. Furthermore, the lack of targeted measures for women’s access to information can explain the meager results on that end. In the future, closer cooperation among implementing agencies for different commitments—such as those responsible for Commitment 6 on gender—could prove fruitful.</p>
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<b>Commitment 6: Gender</b>	
<p><b>Aim of the commitment</b></p>	<p>The aims of this commitment were to reduce gender-based violence, enhance women’s access to justice through improved knowledge of their rights and strengthening of law enforcement agencies, improve women’s political representation, and mainstream adequately funded gender policies.<sup>26</sup> When the commitment was designed, women were poorly represented in spaces of decision-making and in political leadership (e.g., representing only 12.33% of parliamentarians). While there was increased awareness and activism and advances in prevention of gender-based violence, stereotypes that hindered gender equality remained, and key institutions were inadequately resourced.<sup>27</sup></p> <p>The potential impact of this commitment was assessed as moderate, as it addressed important gaps in existing policy and norms, but it represented an initial step towards enhanced access to information, civic participation, public accountability for women, and rectifying structural factors contributing to women’s disempowerment.</p>
<p><b>Did it open government?</b></p> <p><b>Marginal</b></p>	<p>This commitment was substantially completed, and implementation contributed to marginal improvements in public participation in gender policymaking.</p> <p>Through implementation of Milestone 1, Sierra Leone developed and launched a Gender Equality and Women’s Empowerment (GEWE) policy 2020.<sup>28</sup> The policy is publicly available on the website of the Ministry of Gender and Children’s Affairs (<a href="http://www.mogca.gov.sl">www.mogca.gov.sl</a>).<sup>29</sup> The policy was developed through an inclusive process of consultations and validations, including with women and women’s organizations. The resulting policy</p>

<sup>26</sup> See Sierra Leone’s Third Action Plan, <https://www.opengovpartnership.org/members/sierra-leone/>.

<sup>27</sup> See Sierra Leone Design Report 2019-2021, <https://www.opengovpartnership.org/documents/sierra-leone-design-report-2019-2021/>.

<sup>28</sup> Interview with Charles B. Vandi, Director of Gender Affairs, Ministry of Gender and Children’s Affairs, and statement available at <https://statehouse.gov.sl/sierra-leones-president-julius-maada-bio-launches-gender-equality-and-womens-empowerment-policy-says-happy-women-make-a-happy-nation/>, accessed March 11, 2022.

<sup>29</sup> See Sierra Leone’s Gender Equality and Women’s Empowerment Policy, <https://mogca.gov.sl/wp-content/uploads/2021/05/GEWE-Policy-Final.pdf>.



was widely disseminated across the country.<sup>30</sup> As a result, new opportunities to seek feedback from citizens were created.<sup>31</sup>

The text of the policy itself highlights the importance of women's participation and devotes sections to women's decision-making and political leadership, access to information, and gender-responsive budgeting. The GEWE policy sets out strategic actions for the government to address gender imbalance and realize the goals.<sup>32</sup> While the policy has the overall goal of mainstreaming gender issues and functioning as a blueprint in different policy areas, its potential impact remains to be seen. Sahr Kendema from the civil society organization Campaign for Good Governance observed that translating the policy into the Gender Empowerment Bill of 2021 and tabling it in parliament was a significant first step towards ensuring its implementation.<sup>33</sup> It is noteworthy that the policy contains explicit commitments from different governmental agencies, foresees offices with specific authority to monitor compliance with gender commitments, and creates a National Gender Steering Committee. However, at the time of writing, the committee had not yet been appointed.

Importantly, the policy also anticipates an annual reporting mechanism to “ensure the regular and systematic follow-up and review of progress made in the implementation,” with stakeholder engagement and performance-based indicators. At the time of writing this report, however, this mechanism was not yet in place.

Under Milestone 2, the government developed and presented the Gender Empowerment Bill to Parliament,<sup>34</sup> and it is before parliament for discussion and publicly available online. The drafting process involved public consultations, sensitization around the bill and its content, opportunities to receive input and feedback, and identification of priorities by stakeholders. Some provisions of the bill could be potentially relevant for advancing civic participation, such as quotas for elective positions and for access to information. These include provisions stating that ministries should monitor, audit, collect, and analyze gender disaggregated data, and that institutions must prepare an annual report containing measures planned and implemented to promote gender equality.

Sahr Kendema noted that enactment of a final bill reflecting civil society recommendations would result in increased women's representation in elected and appointed positions, more women in politics and decision-

<sup>30</sup> Interview with Charles B. Vandí, Director of Gender Affairs, Ministry of Gender and Children's Affairs.

<sup>31</sup> For example, the “areas of concerns” around which the whole gender policy is structured were identified by participants of consultative meetings. See page 8 of Sierra Leone's Gender Equality and Women's Empowerment Policy, available at <https://mogca.gov.sl/wp-content/uploads/2021/05/GEWE-Policy-Final.pdf>.

<sup>32</sup> Sierra Leone's Gender Equality and Women's empowerment policy, <https://mogca.gov.sl/wp-content/uploads/2021/05/GEWE-Policy-Final.pdf>, Page 24–36.

<sup>33</sup> Interview with Sahr Kendema, Program Manager, Campaign for Good Governance (held on 19th May 2022).

<sup>34</sup> Interview with Charles B. Vandí, Director of Gender Affairs, Ministry of Gender and Children's Affairs. Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP's Steering Committee. See also news available at <https://www.africanews.com/2021/10/22/sierra-leone-moves-to-bring-more-women-into-politics/>, <https://www.songhaiadvisory.com/blog/2021/7/29/sierra-leone-revives-gender-bill-to-reserve-30-of-positions-for-women>, and <https://www.thesierraleonetelegraph.com/president-bios-cabinet-approves-gender-empowerment-bill-for-parliamentary-debate/>, accessed March 11, 2022.

making, with women's priority policy issues reflected in MDAs' development plans. He cautioned that the anticipated impact will only be achieved only if the joint recommendation by civil society organizations who are part of the Yellow Ribbon Campaign for Women's Empowerment<sup>35</sup> are incorporated in the final bill. Generally, CSO's recommendations to parliament revolved around the need to expand the scope and provisions of the bill to align with the strategic objectives of the GEWE policy—particularly in relation to political and public participation, health, education, gender-based violence, marital status, rural women, women and girls with disabilities, gender stereotype, employment, harmful cultural practices, and equal access before the law. The recommendations also include the need to detail clear redress mechanisms, including compensation, damages, and public apology to be made by heads of public or private bodies in the event of failure to comply with or contravention of the bill. Sahr Kendema noted that strong punitive measures would guarantee implementation and compliance.<sup>36</sup> Although these recommendations were formally presented to the relevant parliamentary committees, Kendema noted that the government has the discretion to choose to incorporate this input. For this reason, not all recommendations may be reflected in the final law.

Pursuant to what the IRM could assess after its research, Milestone 3 of the commitment on data disaggregation was not met.

While dealing with an issue of tremendous importance, the potential impact of this commitment is thus far discrete. The processes for developing the gender bill and policy illustrate a productive way to seek feedback from citizens and co-decide priorities. For example, the "areas of concern" that structure the gender policy were identified as priorities by participants in consultative meetings.<sup>37</sup> Furthermore, stakeholders included a wide variety of actors.<sup>38</sup> Sahr Kendema confirmed that CSOs engaged in developing the bill, and policy culminated in the formation of the Yellow Ribbon Technical Committee, a consortium of organizations and women with diverse backgrounds.<sup>39</sup> He also noted some general progress such as access to primary education for girls, free speech for women, and the enactment of stronger legislative framework to protect women. One of the greatest challenges remaining is the appointment of women to political positions, as the number of women in ministerial positions in government is few. For example, out of 146 members of parliament, the parliament of Sierra Leone has only 19 women.<sup>40</sup>

At the time of assessment, this commitment has resulted in marginal changes to open government. Inclusive development of the policy and bill has helped CSOs and women's groups coalesce and collectively influence government policy. However, the long-term impact of this

<sup>35</sup> See the joint proposals by Yellow Ribbon Campaign for Women's Empowerment Key Amendments to the Proposed Gender Empowerment Bill of 2021.

<sup>36</sup> Interview with Sahr Kendema, Program Manager, Campaign for Good Governance (held on 19th May 2022).

<sup>37</sup> See Sierra Leone's Gender Equality and Women's Empowerment Policy, Page 8, available at <https://mogca.gov.sl/wp-content/uploads/2021/05/GEWE-Policy-Final.pdf>.

<sup>38</sup> Idem. Engaged stakeholders included "...parliamentarians; ministries, departments and agencies, non-governmental organizations, community-based organizations; women's and youth groups; groups representing persons with disabilities; military; law enforcement and media."

<sup>39</sup> Interview with Sahr Kendema, Program Manager, Campaign for Good Governance (held on 19th May 2022).

<sup>40</sup> Interview with Sahr Kendema, Program Manager, Campaign for Good Governance (held on 19th May 2022).

	reform is dependent on successful implementation of the gender policy's provisions for a National Gender Steering Committee and annual monitoring process. Likewise, the full impact will depend on the extent to which the final version of the Gender Empowerment Act reflects civil society input and incentivizes compliance. Equally important is the successful passage and implementation of the bill to institutionalize women's participation in society and government.
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<b>Commitment 7: Open Parliament</b>	
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<b>Aim of the commitment</b>	<p>This commitment aimed to make parliament a “more open, responsive, democratic institution with increased civil society engagement.”<sup>41</sup> This commitment sought to have parliament engage in oversight of the implementation of the action plan, develop mechanisms for citizen participation, produce reports, and increase inclusion of women and marginalized groups.</p> <p>At the time the commitment was drafted, Sierra Leone’s parliament did not play a strong role in the OGP process, provided limited opportunities for public engagement, and did not produce annual reports. This commitment was assessed to have a moderate potential impact increase citizen participation and access to information around the parliament.<sup>42</sup></p>
<b>Did it open government?</b>  <b>Marginal</b>	<p>The parliament of Sierra Leone substantially completed this commitment, resulting in marginal advancements in access to information and participation during the implementation period. There remains future opportunity to expand information disclosed and institutionalize opportunities for public participation.</p> <p>The parliament of Sierra Leone drafted both an annual and a financial report (Milestone 4), which were printed and launched at a public event.<sup>43</sup> While printed copies were distributed, the IRM has not been able to access these resources online.</p> <p>The parliament, with support from the Westminster Foundation for Democracy, released a phone application in May 2022 (Milestone 1). The app aims to open parliament by enabling citizens to follow parliament activities and get involved through a new channel of interaction. Users can find information about members of parliament, read press releases, research laws passed in parliament, and check out the parliamentary calendar, among other resources. Live video streams of parliament will soon be available.<sup>44</sup></p> <p>According to the data from the Google Play store,<sup>45</sup> there have been approximately 1,000 downloads of the app. Considering that about 80%</p>

<sup>41</sup> See Sierra Leone’s Third Action Plan, <https://www.opengovpartnership.org/members/sierra-leone/>.

<sup>42</sup> [https://www.opengovpartnership.org/wp-content/uploads/2020/11/Sierra-Leone\\_Design\\_Report\\_2019-2021.pdf](https://www.opengovpartnership.org/wp-content/uploads/2020/11/Sierra-Leone_Design_Report_2019-2021.pdf).

<sup>43</sup> Interview with Alusine Diamond-Suma, country representative for Westminster Foundation for Democracy and member of OGP’s Steering Committee.

<sup>44</sup> Interview with Alusine Diamond-Suma, country representative for Westminster Foundation for Democracy and member of OGP’s Steering Committee, <https://www.wfd.org/story/sierra-leone-parliament-theres-app>.

<sup>45</sup> <https://play.google.com/store/apps/details?id=com.sierraparliament>.

	<p>of web traffic in Sierra Leone originates from Android devices,<sup>46</sup> it would be safe to conclude that relatively few of the 8.1 million Sierra Leoneans have access to parliament through the app. Alusine Diamond-Suma, the Country Representative for Westminster Foundation for Democracy and an OGP Steering Committee member, explained that the app was in the process of being re-downloaded again by citizens after being redesigned to make it usable by both Android and iPhone users.<sup>47</sup></p> <p>Parliament also developed both electronic and physical service charters (Milestone 6)<sup>48</sup> and built a ramp to promote persons with disabilities' physical access to parliament (Milestone 5).<sup>49</sup> The charter was unveiled by the Speaker of the Parliament Hon. Abass Bundu in March 2021, with support from the Westminster Foundation for Democracy.<sup>50</sup> The service charter commits parliament to provide the best parliamentary service standards and to be a more open institution to the public. The charter details how citizens can seek and obtain information about their national assembly. According to Alusine Diamond-Suma, there was some engagement of persons with disabilities in these activities, since work was also informed by annual accessibility audits from the National Commission for Persons with Disability (NCPD) and the Ministry of Social Welfare.<sup>51</sup></p> <p>There is also a parliamentary OGP Working Group in place (Milestone 3), which meets periodically to discuss progress on implementation, with its own terms of reference and a Whatsapp group. The working group consists of 15 members of parliament. Additionally, there are 10 other members of parliament who are responsible for providing oversight on committees supporting OGP-related commitments.<sup>52</sup> This group has supported work on Commitment 6 on gender, currently pushing for the relevant bill—which, according to interviewees, only started gaining more support when presented as an OGP commitment by the working group.</p> <p>Beyond achieving these milestones, parliament held the first-ever “Open Day”<sup>53</sup> around OGP issues, with speakers that included high-level</p>
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<sup>46</sup> <https://datareportal.com/reports/digital-2021-sierra-leone>.

<sup>47</sup> Interview with Alusine Diamond-Suma, Country representative for Westminster Foundation for Democracy and member of OGP's Steering Committee.

<sup>48</sup> See <https://www.wfd.org/story/supporting-sierra-leone-parliament-its-commitment-openness-and-accessibility>.

Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP's Steering Committee; interview with Alusine Diamond-Suma, country representative for Westminster Foundation for Democracy and member of OGP's Steering Committee.

<sup>49</sup> See <http://www.faapa.info/en/2021/12/15/parliament-of-sierra-leone-scores-81-on-openness/>. Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP's Steering Committee; interview with Alusine Diamond-Suma, Country representative for Westminster Foundation for Democracy and member of OGP's Steering Committee.

<sup>50</sup> See Awoko Publications, Parliament unveils Service Charter, <https://awokonewspaper.sl/parliament-unveils-service-charter/> and WFD, Supporting the Sierra Leone Parliament in its commitment to openness and accessibility, <https://www.wfd.org/story/supporting-sierra-leone-parliament-its-commitment-openness-and-accessibility>.

<sup>51</sup> Interview with Alusine Diamond-Suma, country representative for Westminster Foundation for Democracy and member of OGP's Steering Committee.

<sup>52</sup> WFD, Open parliament: Sierra Leone's national assembly committed to transparency for all citizens, <https://www.wfd.org/story/open-parliament-sierra-leones-national-assembly-committed-transparency-all-citizens>.

<sup>53</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP's Steering Committee. Interview with Alusine Diamond-Suma, country representative for Westminster Foundation for Democracy and member of OGP's Steering Committee. Also see <https://www.sl.undp.org/content/sierraleone/en/home/presscenter/articles/parliament-of-sierra-leone-opens-doors-to-citizens-for-the-first.html>, accessed on March 11, 2022.

	<p>governmental officers and invitees from other countries, encouraging parliamentarians to adopt the values of OGP. Also, parliamentarians responded to citizens' questions and gave information on their work.<sup>54</sup></p> <p>The parliament developed the Gender and Equity Compliance Checklist for government functionaries to help advance greater access and inclusion of women and marginalized groups and informal political participation.<sup>55</sup> The IRM identified relevant sources of accessible information on parliament, such as a fact sheet with information on female representation<sup>56</sup> (although participation of women seems to have not increased<sup>57</sup>) and a citizen's budget guide.<sup>58</sup></p> <p>Overall, implementation of this commitment was substantial and resulted in opening parliament to citizens. While the early results of this commitment are marginal at the time of writing, concrete measures can be taken in the future to enhance its results. By empowering citizens to participate in parliamentary processes, availing annual reports, developing an app to enable the public to follow its sessions, setting up a parliamentary working group, and conducting open days, parliament has taken positive steps towards making itself transparent. Next steps could include more active distribution of printed items throughout the country and updating parliament's website to host relevant and easily accessible digital reports and other information.</p> <p>Similarly, while engagement with the public through different events and mechanisms is a step forward in promoting participation, there is still room to institutionalize participation as permanent, rather than having one-time events. There are also opportunities to institutionalize the OGP working group and strengthen its role in supporting all OGP commitments and processes through a streamlined approach.</p>
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## 2.4. Commitment Implementation

The table below includes an assessment of the level of completion for each commitment in the action plan.

<b>Commitment</b>	<b>Completion:</b> <i>(no evidence available, not started, limited, substantial or complete)</i>
<b>1. Access to Justice</b>	<b>Limited</b> This commitment sought to ensure access to justice for all by expanding community-based justice services and increasing transparency. Out of the six milestones of this commitment, there was relevant (although partial) progress made only

<sup>54</sup> Other relevant activities with a similar goal include social media engagement, and OGP virtual study tour on the theme "Parliament as partners for Open Government Reform Sierra Leone." See <https://www.facebook.com/108811303788574/videos/843578019812348/>.

<sup>55</sup> See Sierra Leone's Third Action Plan, available at <https://www.opengovpartnership.org/members/sierra-leone/>, Page 34

<sup>56</sup> See <https://www.parliament.gov.sl/research-publications.html>.

<sup>57</sup> See <https://data.worldbank.org/indicator/SG.GEN.PARL.ZS?locations=SL>.

<sup>58</sup> [https://drive.google.com/file/d/1RlzeWR7CKR95NMYLE-aCGiXD5dSPHfeo/view?fbclid=IwAR1xE4rmTeOL4VdudfB5JNjflZziP85kkASv\\_tW84ixMBuMYb5mZoHegLk8I](https://drive.google.com/file/d/1RlzeWR7CKR95NMYLE-aCGiXD5dSPHfeo/view?fbclid=IwAR1xE4rmTeOL4VdudfB5JNjflZziP85kkASv_tW84ixMBuMYb5mZoHegLk8I), accessed March 11, 2022.

	<p>around one (Milestone 3 on recruiting and training community-based justice service providers). A first group of providers is currently being trained.<sup>59</sup> Furthermore, marginal actions were taken to establish data aggregation systems and promote legal assistance funds (in relationship to milestones 5 and 6).</p> <p>According to Namati, the CSO working as the focal point of this commitment, changes in government staff and lack of coordination among areas of government impaired implementation, especially around the first two milestones, which were included during co-creation by the then-participating government representative.<sup>60</sup> Problems in cross-agency coordination, in particular regarding human resources and financing, were also identified by government officials (e.g., there were contradictory opinions in different areas of government on whether creating a new entity, the Access to Justice Directorate, was necessary).<sup>61</sup> The wide range of policy issues covered by the six milestones of the commitment also appears to have hindered implementation and monitoring efforts.</p> <p>Despite poor implementation, according to Namati, the commitment has helped in raising awareness about the importance of community-based services and in changing narratives on what access to justice means. Furthermore, there has been active engagement of CSOs around the milestones on which some progress has been made. Finally, during the time of implementation of the commitment, a helpful report by the Directorate of Science, Technology and Innovation was published that discussed the number of civil cases recorded in the local courts between 2009 to 2018 across all 149 chiefdoms in Sierra Leone, modeling a fruitful way of making more information on access to justice available to the public.<sup>62</sup></p>
<p><b>2. Education</b></p>	<p><b>Limited</b></p> <p>This commitment aimed at increasing access to junior secondary schools and improving learning environments and outcomes overall. While there has been significant progress in the area of education policy and in gathering, publishing, and increasing accessibility of updated information on education, milestones of the commitment were not fully met. While Sierra Leone has made significant efforts to improve its education policy, commitment milestones have very specific targets, and publicly available evidence does not report on those specific targets.</p>

<sup>59</sup> Interview with Eleanor Thompson, Deputy Director of Program for Namati Sierra Leone, member of OGP’s Steering Committee, and focal point for the access to justice commitment.

<sup>60</sup> Interview with Eleanor Thompson, Deputy Director of Program for Namati Sierra Leone, member of OGP’s Steering Committee, and focal point for the access to justice commitment.

<sup>61</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP’s Steering Committee.

<sup>62</sup> “A Spatial and Temporal Assessment of Cases Reported at Local Courts in Sierra Leone Between 2009 and 2018,” DSTI POLICY BRIEF 1001, [https://www.dsti.gov.sl/wp-content/uploads/2020/01/Social-Fragility-or-Greater-Access-to-Local-Courts\\_-A-Spatial-and-Temporal-Assessment-of-Cases-Reported-at-Local-Courts-in-Sierra-Leone-Between-2009-and-2018.1.pdf](https://www.dsti.gov.sl/wp-content/uploads/2020/01/Social-Fragility-or-Greater-Access-to-Local-Courts_-A-Spatial-and-Temporal-Assessment-of-Cases-Reported-at-Local-Courts-in-Sierra-Leone-Between-2009-and-2018.1.pdf), accessed March 11, 2022.

	<p>For example, the Ministry of Basic and Senior Secondary Education’s “2020 Annual School Census Report”<sup>63</sup> shows that while trainings to teachers were carried out, there has been no increase in the overall number of deployed teachers, especially outside Freetown (Milestone 2). The same report does show, however, incremental improvements in indicators that are relevant for milestones 1 and 3, such as junior secondary schools gross intake rates and primary to junior secondary transition rates.</p> <p>While significant textbooks provision (Milestone 5) was done before the beginning of the action plan,<sup>64</sup> during the relevant period, there was no information on new textbooks’ delivery. The National Council for Civic Education and Development (NaCCED) did, however, draft “National Civic Education (Civics) textbooks” and present them to the president.<sup>65</sup></p> <p>At the time of writing this report, no evidence was found on implementation of Milestone 4 (payment of remote allowances to qualified teachers in rural communities).</p>
<p><b>3. Duty and Tax Exemption</b></p>	<p><b>No evidence available<sup>66</sup></b></p>
<p><b>4. Beneficial Ownership</b></p>	<p><b>Limited</b></p> <p>This commitment aimed to make beneficial ownership disclosure mandatory for all corporate entities and make relevant information publicly available through a Comprehensive Beneficial Ownership Register.</p> <p>While the IRM initially coded this commitment as “noteworthy,” none of the associated milestones were achieved due to constraints that limited implementation. First, as a result of logistical and financial constraints, the government limited the commitment scope to disclosing beneficial ownership information in the extractives sector.<sup>67</sup> Two interviewees<sup>68</sup> attributed this narrowing to the fact that regulatory institutions in the extractives and infrastructure sectors were already set up, making beneficial ownership disclosure easier. Mohamed Baimba Koroma explained that the government was still committed to making beneficial ownership disclosure mandatory for companies in all sectors, which would be captured in the ongoing conversation around</p>

<sup>63</sup> <https://www.dsti.gov.sl/wp-content/uploads/2021/07/ASC-2020-Report.pdf>.

<sup>64</sup> See <https://www.thesierraleone Telegraph.com/26-million-textbooks-and-learning-materials-unveiled-for-schools-in-sierra-leone/>, accessed March 11, 2022.

<sup>65</sup> See <https://www.nacced.gov.sl/uncategorized/nacced-presents-final-draft-of-civic-education-civics-textbooks-to-president-julius-maada-bio/>, accessed March 11, 2022.

<sup>66</sup> While there is an OGP repository formally available online (see Section 3), the IRM conducted significant desk research and found no relevant information on implementation of this commitment in it. The point of contact was not able to provide information on the commitment and directed questions to a representative of the intervening CSO, who however did not respond to the IRM’s request for information by the time of writing this report, after three attempts. The IRM also asked the point of contact for information on a government representative who could speak to the commitment (as the two people listed as responsible for implementation in the action plan did not respond to the request for information either at the time of writing this report either), but no information was provided.

<sup>67</sup> Interview with Daniel T. M. Gbondo, Minerals Policy Advisor, Ministry of Mines and Mineral Resources.

<sup>68</sup> Second Interview with Daniel T. M. Gbondo, Minerals Policy Advisor, Ministry of Mines and Mineral Resources, and Interview with Lavina Banduah, Transparency International.

	<p>amending the Companies Act in addition to the Mines and Minerals Development Bill, which was currently under consideration in parliament.<sup>69</sup> Notably, the government, as a member of the Extractives Industry Transparency Initiative (EITI), was already bound to disclose beneficial ownership information in their mining, oil, and gas companies by 1 January 2020. As late as 2017, the recommendation that the government amend the Companies Act to include beneficial ownership disclosure requirements for all corporate entities had been raised.</p> <p>Three interviewees confirmed that plans are in the pipeline to amend the act to include a provision that mandates all companies disclose their beneficial owners.<sup>70</sup> Besides the information provided by the interviewees, there was no evidence of government efforts to amend the Companies Act during the action plan cycle. One notable change was the adoption of the National Corporate Governance Code 2018 (launched in January 2019), a year before the commencement of the current cycle of the action plan.<sup>71</sup> According to the policy document, all organizations regulated by the Corporate Affairs Commission must disclose their beneficial owners alongside the submission of their annual return.<sup>72</sup> However, the requirements' inclusion in a policy document renders the legal threshold of enforcement low. Obstacles to completing the first milestone to amend the Companies Act subsequently limited progress for the remaining activities, such as amending regulations and establishing a registry.</p> <p>While the Companies Act was not reformed, at the moment of writing this report, there was a mining sector bill before parliament that includes a duty to disclose beneficial ownership information for mining companies (article 156).<sup>73</sup> This bill was developed not only in line with Sierra Leone's commitment under the EITI but also as part of their OGP commitment, both of which are in line with the country's strategic plan (Medium Term National Development Plan 2019-2023).<sup>74</sup> Mabinty M. Kamara writes that the long-standing and recurring problems between mining companies, local host communities, and the government, as well as the president's commitment, necessitated the demand for reform in the mines and minerals sector.<sup>75</sup> Jariatu S. Bangura was of the view, however, that the Mines and Minerals Development</p>
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<sup>69</sup> Interview with Mohamed Baimba Koroma, National Coordinator of Sierra Leone Extractive Industries Transparency Initiatives (SLEITI).

<sup>70</sup> Second Interview with Daniel T. M. Gbondo, Minerals Policy Advisor, Ministry of Mines and Mineral Resources; Interview with Lavina Banduah Transparency International; and Interview with Mohamed Baimba Koroma, National Coordinator of Sierra Leone Extractive Industries Transparency Initiatives (SLEITI).

<sup>71</sup> Regina Pratt, Sierra Leone Gets First National Corporate Governance Code, <https://allafrica.com/stories/201901280426.html>.

<sup>72</sup> National Corporate Governance Code, [https://www.auditservice.gov.sl/wp-content/uploads/2019/01/National\\_Corporate\\_Governance\\_Code.pdf](https://www.auditservice.gov.sl/wp-content/uploads/2019/01/National_Corporate_Governance_Code.pdf), Page 17.

<sup>73</sup> Mines and Minerals Development Bill, 2021.

<sup>74</sup> Second interview with Daniel T. M. Gbondo, Minerals Policy Advisor, Ministry of Mines and Mineral Resources.

<sup>75</sup> Mabinty M. Kamara, CSOs present recommendations for ongoing review of Mines Act, <https://www.politicosl.com/articles/csos-present-recommendations-ongoing-review-mines-act>.



	<p>Bill before the Sierra Leonean parliament aims to repeal and replace the Mines and Minerals Act of 2009, which is largely related to the EITI process.<sup>76</sup> Notably, there has been public engagement during the bill-drafting process.<sup>77</sup> For instance, the Natural Resource Governance and Economic Justice (NaRGEJ) submitted recommendations to the ministry, raising several concerns, including the need for inclusion of the principle of fundamental human rights, governance mechanism, impact assessment, community consent, and community beneficiation.<sup>78</sup></p>
<b>5. Access to Information</b>	<b>Substantial. For details regarding the implementation and early results of this commitment, see Section 2.3.</b>
<b>6. Gender</b>	<b>Substantial. For details regarding the implementation and early results of this commitment, see Section 2.3.</b>
<b>7. Open Parliament</b>	<b>Substantial. For details regarding the implementation and early results of this commitment, see Section 2.3.</b>
<b>8. Records and Archives Management</b>	<p><b>Limited</b></p> <p>This commitment aimed to pass a law on archives and records management to further implement the Right to Access Information Act. At the time the commitment was designed, a draft records management policy had already been developed (Milestone 1). During the implementation period, a National Records and Archives Bill was drafted and subject to a validation meeting on September 2021<sup>79</sup> (Milestone 2). However, the bill was not yet passed (Milestone 3). Given that the core aim of the commitment was not achieved through the passage of the bill, this commitment had limited completion by the end of the implementation period.</p> <p>In addition to the milestones' implementation, the government conducted management trainings<sup>80</sup> and developed a records management training manual,<sup>81</sup> thus promising to further implement the policy.</p>

<sup>76</sup> Jariatu S. Bangura, Sierra Leone: MPs Commits Minerals Development Bill for Thorough Scrutiny, <https://allafrica.com/stories/202203180630.html>.

<sup>77</sup> A nationwide consultation process and technical validation sessions with various stakeholders, including CSO's.

<sup>78</sup> Mabinty M. Kamara, CSOs present recommendations for ongoing review of Mines Act, <https://www.politicosl.com/articles/csos-present-recommendations-ongoing-review-mines-act>

<sup>79</sup> See <https://raic.gov.sl/index.php/en/society-culture-2/229-raic-holds-validation-of-records-and-archives-bill>, accessed March 11, 2022.

<sup>80</sup> See <https://raic.gov.sl/index.php/en/programmes-projects/records-management/>.

<sup>81</sup> See <https://raic.gov.sl/index.php/en/society-culture-2/233-raic-launches-records-management-training-manual>, accessed March 11, 2022.

### III. Multi-Stakeholder Process

#### 3.1 Multi-Stakeholder Process Throughout Implementation

In 2017, OGP adopted the OGP Participation and Co-Creation Standards intended to support participation and co-creation by civil society at all stages of the OGP cycle. All OGP-participating countries are expected to meet these standards. The standards aim to raise ambition and quality of participation during development, implementation, and review of OGP action plans.

OGP’s Articles of Governance also establish participation and co-creation requirements a country or entity must meet in their action plan development and implementation to act according to the OGP process. Sierra Leone **acted contrary** to OGP process.<sup>82</sup> Sierra Leone did not publish any information on implementation of the action plan in the relevant website and did not meet minimum standards for its OGP website repository.

Please see Section 3.2 for an overview of Sierra Leone’s performance implementing the Co-Creation and Participation Standards throughout the action plan implementation.

**Table 3.2: Level of Public Influence**

The IRM has adapted the International Association for Public Participation (IAP2) “Spectrum of Participation” to apply it to OGP.<sup>83</sup> In the spirit of OGP, most countries should aspire to “collaborate.”

Level of public influence		During development of action plan	During implementation of action plan
Empower	The government handed decision-making power to members of the public.		
Collaborate	There was iterative dialogue AND the public helped set the agenda.	✓	
Involve	The government gave feedback on how public inputs were considered.		
Consult	The public could give inputs.		✓
Inform	The government provided the public with information on the action plan.		
No Consultation	No consultation		

Sierra Leone established a Steering Committee with equal representation of government and civil society (eight members each). The membership of the committee remained stable throughout the whole cycle of the action plan. The “terms

<sup>82</sup> Acting Contrary to Process—Country did not meet (1) “involve” during the development or “inform” during implementation of the action plan, or (2) the government fails to collect, publish, and document a repository on the national OGP website/webpage in line with IRM guidance.

<sup>83</sup> “IAP2’s Public Participation Spectrum,” IAP2, 2014.

[https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum\\_8.5x11\\_Print.pdf](https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf).

of reference” of the committee envision it engaging during the implementation stage in a participatory manner. To meet this end, the Steering Committee had to move to virtual monthly meetings after the COVID-19 pandemic stalled its work temporarily.<sup>84</sup> While remote participation helped the steering committee comply with its mandate, virtual meetings remained challenging due to lack of access to internet and digitalization in different parts of the country, and to long-standing practices that are highly “paper-based,” including in the government sector.<sup>85</sup>

The Steering Committee conducted both in-person and remote activities with various stakeholders outside the forum and made efforts to consult and validate different outputs. However, Sierra Leone did not meet the minimum requirements on developing and maintaining a commitment repository. While they have a website dedicated to the OGP process, it only contains the text of the third national action plan and the related IRM’s Design Report,<sup>86</sup> with no information on implementation of any commitment or references to other documents. Overall, the tracking progress on implementation appears to have been difficult due to different challenges identified by civil society participants in the steering committee, including a) low participation of high-level officers from government, with sufficient decision-making authority and technical knowledge, despite efforts made to encourage their engagement; b) the fact that a relevant part of the follow-up work happened in a “decentralized” manner, led by individual implementing agencies for each commitment; c) lack of publicly available information on the work of the Steering Committee in general, and particularly around their monitoring of implementation of the action plan.

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<sup>84</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP’s Steering Committee.

<sup>85</sup> Interview with Eleanor Thompson, Deputy Director of Program for Namati Sierra Leone, member of OGP’s Steering Committee, and focal point for the access to justice commitment.

<sup>86</sup> See <https://www.nacced.gov.sl/ogp-repository/>, accessed February 17, 2022.

### 3.2 Overview of Sierra Leone’s performance throughout action plan implementation

Key:

Green=Meets standard

Yellow=In progress (steps have been taken to meet this standard, but standard is not met)

Red=No evidence of action

Multi-Stakeholder Forum	During Development	During Implementation
<b>1a. Forum established:</b> There is an OGP Steering Committee established to undertake participatory processes to inform the development and implementation of the action plan. <sup>87</sup>	Green	Green
1b. Regularity: Although COVID-19 initially stalled Steering Committee’s meetings, it resumed meetings virtually on a monthly basis. <sup>88</sup>	Green	Green
1c. Collaborative mandate development: the mandate did not change during implementation of the action plan. <sup>89</sup>	Yellow	N/A
1d. Mandate public: There is no publicly accessible information on the Steering Committee, although a “terms of reference” document was provided when requested by the IRM.	Red	Red
<b>2a. Multi-stakeholder:</b> The forum includes both governmental and non-government representatives.	Green	Green
2b. Parity: There are eight government and eight nongovernment Steering Committee members. <sup>90</sup>	Green	Green
<b>2c. Transparent selection:</b> No new members were selected for the implementation phase, as membership remains stable throughout each action plan. <sup>91</sup>	Green	N/A
2d. High-level government representation: The Steering Committee formally includes high-level representatives from government,	Green	Yellow

<sup>87</sup> “Terms of Reference” document for Sierra Leone Open Government Partnership Steering Committee.

<sup>88</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP’s Steering Committee.

<sup>89</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP’s Steering Committee.

<sup>90</sup> “Terms of Reference” document for Sierra Leone Open Government Partnership Steering Committee; interview with Hannah (Hamida) Jimmy, government contact person and member of OGP’s Steering Committee.

<sup>91</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP’s Steering Committee.

although they often do not attend meetings. <sup>92</sup> There have been government efforts to encourage their commitment with OGP. <sup>93</sup>		
<b>3a. Openness:</b> The forum accepts input on the action plan implementation from any member of the general public. There has been general, open discussion on the action plan overall, <sup>94</sup> and comments on tracking implementation were welcome on social media. Furthermore, there was ad hoc engagement with civil society around implementation of each commitment, although not done systematically in a centralized manner. <sup>95</sup>	Green	Green
<b>3b. Remote participation:</b> There are opportunities for remote participation in at least some spaces, although access to internet is still a barrier in the country, making remote participation less effective. <sup>96</sup>	Green	Green
<b>3c. Minutes:</b> There are minutes available for at least some of the meetings of the forum, although the government does not proactively publish them (the IRM could access some minutes after requesting them). The government also communicates on relevant activities through social media.	Red	Yellow

Key:

Green=Meets standard

Yellow=In progress (steps have been taken to meet this standard, but standard is not met)

Red=No evidence of action

Action Plan Implementation	
<b>4a. Process transparency:</b> The website that is designated as the main source for OGP information contains no information on the progress of commitments' implementation. <sup>97</sup>	Red
<b>4b. Communication channels:</b> The website has no feature to allow the public to engage on action plan progress updates. <sup>98</sup> The basic source to engage online is through the National Council of Civic Education and Development's Facebook page.	Red

<sup>92</sup> Interview with Eleanor Thompson, Deputy Director of Program for Namati Sierra Leone, member of OGP's Steering Committee, and focal point for the access to justice commitment.

<sup>93</sup> "Terms of Reference" document for Sierra Leone Open Government Partnership Steering Committee; National Council for Civic Education and Development Facebook Page. <https://m.facebook.com/people/National-Council-for-Civic-Education-and-Development/100068658423989/>.

<sup>94</sup> National Council for Civic Education and Development Facebook Page. <https://m.facebook.com/people/National-Council-for-Civic-Education-and-Development/100068658423989/>. See also Sierra Leone's OGP's website, <https://www.nacced.gov.sl/>.

<sup>95</sup> Interview with Eleanor Thompson, Deputy Director of Program for Namati Sierra Leone, member of OGP's Steering Committee, and focal point for the access to justice commitment.

<sup>96</sup> Interview with Eleanor Thompson, Deputy director of Program for Namati Sierra Leone, member of OGP's Steering Committee, and focal point for the access to justice commitment.

<sup>97</sup> Email exchange with Kalilu Totangi, Chairperson of the National Council of Civic Education and Development.

<sup>98</sup> See Sierra Leone's OGP's website, <https://www.nacced.gov.sl/>.

4c. Engagement with civil society: The government held at least two open meetings with civil society to discuss the implementation of the action plan, although engagement happened mostly in a non-centralized manner on a commitment-specific basis. <sup>99</sup>	Green
4d. Cooperation with the IRM: The IRM Design Report was published for comments from any person for two weeks and actively shared in social media. <sup>100</sup>	Green
4.e MSF engagement: The MSF discusses implementation progress and convenes relevant governmental officers to debate advancements made on each commitment. <sup>101</sup>	Green
4.f MSF engagement with self-assessment report: The government was not able to produce the self-assessment report.	Red
<b>4.g. Repository:</b> The website's repository only contains the text of the third national action plan and the related IRM's Design Report, <sup>102</sup> with no information on implementation of any commitment or references to other documents.	Red

<sup>99</sup> Interview with Eleanor Thompson, Deputy Director of Program for Namati Sierra Leone, member of OGP's Steering Committee, and focal point for the access to justice commitment.

<sup>100</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP's Steering Committee. See also National Council for Civic Education and Development Facebook Page. <https://m.facebook.com/people/National-Council-for-Civic-Education-and-Development/100068658423989/>.

<sup>101</sup> Interview with Hannah (Hamida) Jimmy, government contact person and member of OGP's Steering Committee. See also events reported on National Council for Civic Education and Development Facebook Page. <https://m.facebook.com/people/National-Council-for-Civic-Education-and-Development/100068658423989/>.

<sup>102</sup> See <https://www.nacced.gov.sl/ogp-repository/>, accessed February 17, 2022.

## IV. Methodology and Sources

This review was prepared by the IRM in collaboration with Maria Emilia Mamberti and was reviewed by Brendan Halloran, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP).

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual<sup>103</sup> and in Sierra Leone's Design Report 2019-2021.

For more information about the IRM refer to the “**About IRM**” section of the OGP website available [here](#).

### About the IRM

**The 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 (IRM) assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.



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<sup>103</sup> IRM Procedures Manual, V.3. <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

## Annex I. IRM Indicators

The indicators and method used in the IRM research can be found in the IRM Procedures Manual.<sup>104</sup> A summary of key indicators the IRM assesses is below:

- **Verifiability:**
  - Not specific enough to verify: As written in the commitment, do the objectives stated and actions proposed lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment process?
  - Specific enough to verify: As written in the commitment, are the objectives stated and actions proposed sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment process?
- **Relevance:** This variable evaluates the commitment's relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine the relevance are:
  - Access to Information: Will the government disclose more information or improve the quality of the information disclosed to the public?
  - Civic Participation: Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
  - Public Accountability: Will the government create or improve public facing opportunities to hold officials answerable for their actions?
- **Potential impact:** This variable assesses the *potential impact* of the commitment, if completed as written. The IRM researcher uses the text from the action plan to:
  - Identify the social, economic, political, or environmental problem;
  - Establish the status quo at the outset of the action plan; and
  - Assess the degree to which the commitment, if implemented, would impact performance and tackle the problem.
- **Completion:** This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.
- **Did It Open Government?:** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.

### Results oriented commitments?

A potentially starred commitment has more potential to be ambitious and to be implemented. A good commitment design is one that clearly describes the:

1. **Problem:** What is the economic, social, political, or environmental problem? Rather than describing an administrative issue or tool (e.g., 'Misallocation of welfare funds' is more helpful than 'lacking a website.').
2. **Status quo:** What is the status quo of the policy issue at the beginning of an action plan (e.g., "26 percent of judicial corruption complaints are not processed currently.")?
3. **Change:** Rather than stating intermediary outputs, what is the targeted behavior change that is expected from the commitment's implementation

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<sup>104</sup> "IRM Procedures Manual," OGP. <https://www.opengovpartnership.org/documents/irm-procedures-manual>.



(e.g., “Doubling response rates to information requests” is a stronger goal than “publishing a protocol for response.”)?

### **Starred commitments**

One measure, the “starred commitment” (★), deserves further explanation due to its particular interest to readers and usefulness for encouraging a race to the top among OGP-participating countries/entities. To receive a star, a commitment must meet several criteria:

- The commitment’s design should be **Verifiable, Relevant** to OGP values, and have **Transformative** potential impact. As assessed in the Design Report.
- The commitment’s implementation must be assessed by IRM Implementation Report as **Substantial** or **Complete**.

This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.