

# **Independent Reporting Mechanism**

Results Report:  
Senegal 2023–2025

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

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## Executive Summary

**Senegal's second OGP action plan saw the long-awaited passage of fundamental open government legislation, including the Access to Information Act, Whistleblower Protection Act, and decrees to strengthen the anticorruption authority and asset declarations. However, challenges around coordination, ownership, and funding inhibited other reforms. Notably, Senegal formalized its National Steering Committee and Sectoral Technical Committees.**

### Implementation

Senegal's second action plan achieved notable progress on flagship anticorruption and access to information reforms. Commitments 1 and 3 were driven by longstanding civil society advocacy and alignment with the new administration's agenda. Reformers also attributed the inclusion of Commitment 1 in the Open Gov Challenge with the successful passage of the Access to Information Law.

The remaining 6 commitments saw limited implementation, and no early results. These included reforms around open budgets, transparency in the fisheries sector, access to public services, citizen participation and local open government.<sup>1</sup> Commitments in this action plan were largely continued from the previous plan.

Under Commitment 1, Senegal passed the Access to Information Act and established the National Commission for Access to Information (CONAI) to promote and protect the right to information. Senegal now has a dedicated legal framework that defines the scope and processes around the right to information, as well as sanctions for noncompliance. While a significant step, future considerations include implementing the law, ensuring CONAI's independence, and reasonable use of exemptions to disclosure.

Under Commitment 3, the Government of Senegal revised and strengthened anticorruption laws and the National Agency for the Prevention of Corruption (OFNAC). OFNAC's mandate is now focused on the prevention and prosecution of corruption, mandatory publication of annual reports, and a transparent selection process for appointing members. Senegal also amended the law on asset declarations to expand

### At a Glance

#### LEVEL OF COMPLETION

2/8

Complete or substantially complete commitments

#### EARLY RESULTS

2/8

Commitments with early results

2/8

Commitments with significant results

#### KEY OBSERVATIONS

- Strategic advocacy by government and civil society reformers led to significant open government legislative achievements.
- Ownership and coordination challenges hampered progress for several commitments.
- Senegal's newly introduced monitoring process could address communication gaps that impacted the first two action plans.
- Budgetary constraints significantly hindered action plan implementation.

**Met the minimum requirements during implementation: Yes**

the categories of individuals required to submit declarations. Finally, Senegal passed a Whistleblower Protection Act, the first in Francophone Africa.

Although highlighted as promising in the Action Plan Review, Commitment 4 on fisheries transparency fell short of expected results. Senegal’s membership process did not advance due to a lack of coordination and communication among government actors. However, reformers were optimistic that progress could resume under the next action plan. Cross-cutting challenges for commitments included unclear ownership over commitment activities, incoordination among implementing institutions, limited funding, and a lack of political prioritization.

## Participation and Co-Creation

Senegal’s OGP process is overseen by the Directorate for the Promotion of Good Governance (DPBG) in the Ministry of Justice, with the National Steering Committee (NSC) as the multi-stakeholder body.<sup>2</sup> A June 2024 ministerial decree formalized its creation and composition.<sup>3</sup> However, due to a change of government in March 2024, government members of the National Steering Committee and implementing institutions saw significant turnover. This included changes in the Minister of Justice and the DPBG Director.<sup>4</sup> Senegal’s OGP civil society platform, P-OSC-PGO, also developed rules of procedure.<sup>5</sup>

Co-creation for the second action plan involved an inclusive four-stage process: facilitator training, consultations across 14 regions with around 400 participants, drafting, and action plan validation workshops.<sup>6</sup> This was a welcome improvement over the previous action plan, including new sectoral working groups with two administration and two civil society members. It also involved engaging traditional communicators to share OGP information at the local level. Despite some financial obstacles, co-creation of the second action plan provided greater participation opportunities than the previous one.<sup>7</sup> With the development of a Senegal OGP website,<sup>8</sup> Senegal met the OGP Participation and Co-Creation minimum requirements.

## Implementation in Context

Implementation was positively driven by civil society’s perseverance and the new government’s political priorities. A change of government led to significant turnover in government officials, including implementers and National Steering Committee (NSC) members.<sup>9</sup> However, implementation of Commitments 1 and 3 were significantly aided by the new administration’s prioritization of anticorruption and access-to-information reforms.<sup>10</sup>

Some challenges arose from budgetary constraints as well as coordination, ownership, and communication difficulties across commitments that involved a large number of institutions (for example, Commitments 5 and 7).<sup>11</sup> International partners—including the PAGOF (Open Government Support Program in Francophone Africa) and USAID (pre-withdrawal)—provided financial support, notably for website creation and workshops.<sup>12</sup> The creation of Sectoral Technical Committees with equal representation from the administration and civil society has the potential to address coordination challenges during implementation of future action plans.

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<sup>1</sup> See “Senegal Action Plan 2023-2025 (December)” (OGP, 8 Jan. 2024), <https://www.opengovpartnership.org/documents/senegal-action-plan-2023-2025-december/>.

<sup>2</sup> “Decree on the creation and organization of the Open Government Partnership National Steering Committee.” Ministry of Justice. Republic of Senegal. 20 June 2024. Document shared with the IRM researcher.

<sup>3</sup> *Id.*

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<sup>4</sup> Présidence de la République du Sénégal, “Liste complète des membres du nouveau gouvernement. [Full list of members of the new government.]” Présidence du Sénégal, 6 Sep. 2025, <https://www.presidence.sn/fr/actualites/liste-complete-des-membres-du-nouveau-gouvernement>; Le Quotidien, “Ousmane Diagne a pris fonction au ministère de la Justice [Ousmane Diagne has taken up his post at the Ministry of Justice],” Le Quotidien, 12 Apr. 2024, <https://lequotidien.sn/ousmane-diagne-a-pris-fonction-au-ministere-de-la-justice/>.

<sup>5</sup> Abdoulaye Ndiaye, (ARTICLE 19 civil society member, OGP MSF Co-Chair), interview by IRM researcher, 23 and 26 Dec. 2025.

<sup>6</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Post], 5 Dec. 2023, <https://web.facebook.com/share/p/1DSRwQ7mwP/>.

<sup>7</sup> Abdoul Diao (Legal Officer, Head of the Institutional Governance Division at DPBG) interview by IRM researcher, 12 Dec. 2025; Ndiaye, interview.

<sup>8</sup> Open Government Senegal, “Partenariat pour un Gouvernement Ouvert (PGO) [Open Government Partnership (OGP)],” accessed 12 Mar. 2026, <https://pgo.sn/>.

<sup>9</sup> Bocar Harouna Diallo, “Les multiples défis de l’élection présidentielle au Sénégal en 2024 [Senegal's 2024 presidential election faced profound challenges that threatened its democratic stability],” Le Quotidien, 15 Jan. 2024, <https://lequotidien.sn/les-multiples-defis-de-lelection-presidentielle-au-senegal-en-2024/>.

<sup>10</sup> Cécile Sabina Bassene, “Lutte contre la corruption: le Président Diomaye annonce la mise sur pied de 4 projets de lois” [Fight against corruption: President Diomaye announces the introduction of four bills],” PressAfrik, 30 Sep. 2024. [https://www.pressafrik.com/Lutte-contre-la-corruption-le-President-Diomaye-annonce-la-mise-sur-pied-de-4-projets-de-lois\\_a278963.html](https://www.pressafrik.com/Lutte-contre-la-corruption-le-President-Diomaye-annonce-la-mise-sur-pied-de-4-projets-de-lois_a278963.html).

<sup>11</sup> Diao, interview.

<sup>12</sup> Ndiaye, interview.

## Section I. Key Observations

The key observations below offer reflections from Senegal’s second action plan cycle. These lessons aim to support Senegal’s future action plans and broader open government journey.

### **Observation 1: Strategic advocacy by government and civil society reformers led to significant open government legislative achievements.**

For almost 20 years, Senegalese civil society has advocated for an access to information law. The election of President Bassirou Diomaye Faye’s administration following the March 2024 elections renewed hope for their campaign. Consequently, the Ministry of Justice and civil society undertook coordinated advocacy efforts among the highest levels of government. This included the Director for the Directorate for the Promotion of Good Governance (DPBG) publicly committing Senegal to passing the law at the OGP Africa and Middle East Summit in Nairobi in March 2025. Likewise, DPBG submitted this reform to the Open Gov Challenge, highlighting it as Senegal’s flagship open government reform. In April 2025, President Diomaye Faye included access to information among his administration’s four key bills.<sup>1</sup>

Civil society and DPBG representatives interviewed agreed these factors ultimately culminated in the passage of the ATI Law. Similarly, civil society advocacy coalesced with the new administration’s reform agenda for the anticorruption legislation aimed for under Commitment 3 to strengthen the Office for the Fight Against Corruption, asset declaration, and protections for whistleblowers. Looking ahead, the Government of Senegal can use OGP as a delivery instrument for its governance reform agenda. Senegal could align future OGP commitments with government priorities to increase political traction, strengthen reform legitimacy across institutions, and help mobilize internal resources for implementation.

### **Observation 2: Ownership and coordination challenges hampered progress for several commitments.**

Several commitments in the action plan combined similar, but distinct, reforms that required coordination among a high number of implementing institutions. Challenges in communication and coordination across these institutions ultimately limited implementation. For instance, Commitment 2 brought together national and local open budget reforms, which fall under different government bodies. This contributed to miscommunications on ownership and responsibility for commitment activities. Likewise, Commitment 5 sought to involve five different government entities and Commitment 7 aimed to coordinate 10 government entities.

Moving forward, stronger institutional anchoring of OGP within the Government of Senegal could support a government-wide reform approach, rather than fragmented efforts. The next action plan could also focus on a smaller number of commitments that are government priorities, clearly owned, and feasible. During co-creation, the NSC can consider which reforms to separate out into individual commitments to facilitate clear responsibility among implementing bodies. The NSC can also meet with potential implementers to confirm their understanding, ownership, and collaboration partners for commitments.

**Observation 3: Senegal’s newly introduced monitoring process could help to address communication gaps that impacted the first two action plans.**

Positively, Senegal’s OGP community has made progress in strengthening documentation and communication channels. The launch of the Senegal OGP website,<sup>2</sup> development of monitoring forms, and formation of sectoral working groups all bode well for internal and external communication. To facilitate further shared understanding of progress, Senegal could ask implementers to update the monitoring forms on a regular basis to help inform NSC meetings. DPBG could then make the forms and meeting notes available on the Senegal OGP website or public Google Drive. This could help identify implementation challenges to be addressed before the end of the implementation period. It can also help to ensure the IRM has sufficient information to fully assess commitment implementation.

**Observation 4: Budgetary constraints significantly hindered action plan implementation.**

Civil society and government stakeholders involved in Senegal's OGP process—especially during implementation—were hampered by insufficient financial resources. According to the OGP Point of Contact, core activities are funded through the DPBG budget, while individual commitments rely on the operational budgets of their responsible entities. The ministerial decree establishing the NSC provides for reimbursement for activity-related expenses.<sup>3</sup> However, both DPBG and civil society representatives noted limited funds contributed to inconsistent meeting attendance and reduced engagement.<sup>4</sup> Civil society mitigated gaps by mobilizing external resources, such as through PAGOF, to support specific committee activities. Meanwhile, advocacy efforts are underway with the Ministry of Justice to secure a dedicated OGP budget line that would cover committee session expenses, ensuring sustainable participation moving forward.<sup>5</sup> NSC members could consider developing a strategy or forming a sub-committee to mobilize and harmonize government, civil society, and partner resources for OGP commitments and activities. Finally, a more streamlined action plan that prioritizes commitments aligned with the government reform agenda could ensure greater political and financial support.

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<sup>1</sup> ARTICLE 19, “Adopter une loi d’accès à l’information est le défi du gouvernement ouvert du Sénégal en 2025 [Passing an access to information Bill is the challenge facing Senegal’s open government in 2025],” ARTICLE 19, 2 Apr. 2025, <https://article19ao.org/adopter-une-loi-dacces-a-linformation-est-le-defi-du-gouvernement-ouvert-du-senegal-en-2025/>.

<sup>2</sup> Open Government Senegal, “Partenariat pour un Gouvernement Ouvert (PGO) [Open Government Partnership (OGP)],” accessed 12 Mar. 2026, <https://pgo.sn/>.

<sup>3</sup> <sup>3</sup> “Decree on the creation and organization of the Open Government Partnership National Steering Committee.” Ministry of Justice. Republic of Senegal. 20 June 2024. Document shared with the IRM researcher.

<sup>4</sup> Abdoul Diao (Legal Officer, Head of the Institutional Governance Division at DPBG), interview by IRM researcher, 12 Dec. 2025; Abdoulaye Ndiaye, (ARTICLE 19 civil society member, OGP MSF Co-Chair), interview by IRM researcher, 23 and 26 Dec. 2025.

<sup>5</sup> Ndiaye interview.

## Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objectives, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

### Table 1. Commitments with Early Results

**Commitment 1:** Enshrined citizens' right to information through the passage of the Access to Information Act and establishment of the National Commission for Access to Information.

**Commitment 3:** Strengthened the anticorruption regime by reinforcing the National Office for the Fight against Fraud and Corruption's powers, broadening asset declaration requirements, and passing the Whistleblower Protection Act.

### Commitment 1: Promotion of Access to Information (ATI)

**Implementers:** Ministry of Justice / Directorate for the Promotion of Good Governance

#### Context and Objectives

This commitment aimed to establish a legal framework for access to information (ATI). Prior to implementation, Senegal lacked a comprehensive law and implementing authority, resulting in the public having only piecemeal access to government-held information. The Senegalese Access to Information Act underwent 17 years of collaborative preparation involving civil society, government, and international partners. Since 2008, Senegalese civil society organizations such as Article-19 and Forum Civil championed this legislation, advocating for its alignment with the African Union's exemplary model.<sup>1</sup>

A first draft was jointly developed by government and civil society but stalled for over five years, despite a favorable Supreme Court opinion. Disagreement around exemptions for national security, defense, personal data protection, and independence of the ATI oversight body were key obstacles.<sup>2</sup> President Bassirou Diomaye Faye's administration revived progress. The Ministry of Justice made it a priority and reopened consultations on the draft bill in late 2024–early 2025, with the United Nations Development Programme (UNDP) supporting the process.<sup>3</sup> Besides this commitment's continuation from the previous action plan, it was also submitted to the Open Gov Challenge.<sup>4</sup>

#### Early Results: Significant Results

The adoption of Senegal's Access to Information Act in August 2025 by the National Assembly marks a significant achievement for government transparency efforts. The law establishes a legal basis for citizens to request information from public entities and requires a response within 15 days as well as proactive publication of information online. It also establishes the National Commission for Access to Information (CONAI), whose role is to oversee access and impose sanctions on officials who refuse to make information available. While a notable step, work now

remains to implement the law and to protect the complementary rights of expression and freedom of the press for Senegalese' full right to information to be realize.

All milestones were implemented. Under Milestone 1, the Directorate for the Promotion of Good Governance (DBPG) and civil society undertook awareness-raising and advocacy activities for the adoption of the law and its subsequent texts. Civil society organizations such as Article-19 West Africa, Forum Civil, and around ten others stepped up with public statements<sup>5</sup> and meetings with government officials.<sup>6</sup> DBPG pushed the case to Senegal's highest authorities and gave it international resonance. According to DBPG representatives,<sup>7</sup> the commitment made by the DPBG Director at the OGP Africa and Middle East Summit in Nairobi in March 2025 proved a pivotal trigger for the advocacy's success. They further noted that the Ministry of Justice championed the advocacy up to the Presidency. Subsequently, the draft bill was approved by the Council of Ministers on July 30, 2025,<sup>8</sup> and Law No. 2025-15<sup>9</sup> was passed by the National Assembly on August 26, 2025,<sup>10</sup> which established CONAI.

Stakeholders hailed the adoption of this law as historic. Civil society have welcomed it, noting that it could revolutionize access to information, journalism, and information integrity, while empowering citizens, promoting their participation, and building trust in institutions. The Coordinator for Forum Civil views it as a much-improved law compared to previous drafts.<sup>11</sup> The Regional Lead for Article-19 Senegal and West Africa expressed 70% satisfaction despite exceptions.<sup>12</sup> The law's strengths include its scope, timelines for handling requests, sanctions, and dedicated promotion efforts. The law mandates all constitutional institutions, such as the Presidency, National Assembly, government, Constitutional Council, courts, and tribunals to proactively disclose information. It sets clear deadlines: immediate responses when feasible, up to 15 days otherwise, or 8 days for urgent cases. Noncompliance triggers penalties, including fines from 500,000 to 1 million CFA francs and potential criminal proceedings. Finally, the CONAI leads law promotion and access rights protection.<sup>13</sup>

However, all agree that while its passage marks a major milestone for Senegalese democracy, it still contains restrictions that could limit maximum disclosure of information.<sup>14</sup> The law allows three main categories of restrictions. The first concerns information protected by secrecy, such as that relating to national defense, judicial investigations and proceedings, government deliberations, attorney-client relationships, medical confidentiality, and industrial and commercial interests. The second category covers information whose disclosure could harm sensitive interests such as foreign policy, monetary stability, public safety, or the proper conduct of legal proceedings. Finally, the third category covers information governed by specific laws or regulations, which set their own terms of access. Civil society fears that these exceptions could be exploited as pretexts by public institutions to withhold information.<sup>15</sup>

A global benchmark tool for assessing national right-to-information legal frameworks scored Senegal's law 71 out of 152 points, confirming the concerns raised by civil society regarding restrictions. This below-average rating stems from the absence of a public interest override, the lack of a no-harm test for key exceptions, vague appeal procedures, and unclear access rights provisions. Nevertheless, the implementing decree for CONAI's structure and functioning incorporates several civil society recommendations.<sup>16</sup> For instance, it clarifies the previously vague appeal process and specifies CONAI's funding sources, resolving civil society concerns over financial opacity.<sup>17</sup>

Under Milestone 2, the commitment established CONAI as an independent administrative authority to operationalize access to information. President Diomaye Faye signed a decree outlining CONAI's organization and functioning in November 2025.<sup>18</sup> CONAI will be composed of 12 members, including 2 from civil society and employers and 10 representatives appointed by government bodies. The process of appointing commission members was underway at the time of writing, according to the DPBG representative.<sup>19</sup>

Civil society representatives await the law's implementation outcomes and anticipate necessary adjustments based on practical results.<sup>20</sup> Some of these concerns regard CONAI's composition and independence. The President of a Senegalese press organization, the Council for the Observation of Ethical and Professional Standards in the Media (CORED),<sup>21</sup> stated that its composition is too administrative, and should instead have parity, with six representatives each from the administration and civil society.<sup>22</sup> CONAI is placed under the authority of the Prime Minister's Office, a structure that, according to CORED's president, undermines its independence. DPBG representatives state that CONAI will nonetheless retain its independence despite being under the Prime Minister's Office, regarding this as a challenge to overcome.<sup>23</sup>

The remaining milestones advanced awareness of the ATI laws, access to open data, and public information on Senegal's OGP efforts. Government and civil society have now begun the task of training and raising awareness on the Access to Information Law, particularly by civil society organizations.<sup>24</sup> The law was shared on Senegal's OGP websites<sup>25</sup> and local media outlets.<sup>26</sup> The National Agency for Statistics and Demographics (ANSD) updated available data on Senegal's data portal.<sup>27</sup> A data summary page was launched in 2016 but lacked updated data.<sup>28</sup> The Open Data Inventory (ODIN) 2024 ranking highlights major strides: Senegal climbed from 100<sup>th</sup> to 33<sup>rd</sup> globally (3<sup>rd</sup> in Africa) with a 75/100 score, representing a 67-place leap in two years.<sup>29</sup> Senegal's OGP website was launched and undergoing further updates at the time of writing.<sup>30</sup>

## Looking Ahead

This commitment laid important institutional and legal groundwork for greater government transparency. The commitment holder and civil society members credit three pivotal elements: its integration into the Open Gov Challenge, the unified advocacy efforts between civil society organizations and the DPBG, and the demonstrated political commitment from Senegalese leaders. This coordinated approach could be used to continue strengthening the ATI legal framework and its implementation moving forward. In particular:

- CONAI could collaborate with nongovernment partners **to develop proposals for supplementary decrees or guidelines clarifying the ATI Act's exemptions.** This collaboration could build on ARTICLE 19 West Africa's UNDP-supported project, launched in early 2026, which advocates for strengthening the legal and administrative framework for access to information.<sup>31</sup>
- DPBG and CONAI can collaborate on **raising awareness on among civil servants and the public** and **supporting public institutions to develop standardized information request forms and publish them online.**
- **The Government of Senegal can reinforce its commitment to freedoms of expression and press,** which have lately been challenged.<sup>32</sup> Safeguarding these freedoms will be an important element to the full realization of the right to information.

Senegalese reformers can look to examples from across the partnership on how members use OGP to implement ATI laws. For instance:

- Kenya has used OGP to adopt and implement their ATI Act across action plans. Progress has been driven by an ATI commitment working group co-chaired by the implementing authority, the Commission on Administrative Justice, and civil society (Article-19 East Africa). Together, the Commission and civil society partners incorporated ATI training for public officials into the Kenya School of Government. They also collaboratively drafted implementing regulations and developed a model ATI law for counties. The working group used each action plan as an opportunity to agree on shared objectives, identify a roadmap, and harmonize resources.<sup>33</sup>
- South Africa pioneered a Promotion of Access to Information Act (PAIA) in 2000, mandating public and private bodies to respond to information requests. Initially overseen by the South African Human Rights Commission, enforcement shifted in 2021 to the independent Information Regulator.<sup>34</sup> The Information Regulator is an independent body subjected only to the law and the constitution and is accountable to the National Assembly. The Information Regulator is, among others, empowered to monitor and enforce compliance by public and private bodies with the provisions of the PAIA and the POPIA, 2013.<sup>35</sup>

### Commitment 3: Fight against corruption

**Implementers:** National Office for the Fight against Fraud and Corruption (OFNAC)

#### Context and Objectives

Carried over from the previous action plan, this commitment sought to reinforce Senegal’s legal and institutional anticorruption regime. It aimed to strengthen the National Office for the Fight against Fraud and Corruption (OFNAC) and laws around asset declarations and whistleblower protections. The commitment also foresaw public dissemination of the anticorruption strategy and other anticorruption legislation.

#### Early Results: Significant Results

Commitment 3 significantly strengthened Senegal’s anticorruption laws and institutions. During the implementation period, OFNAC’s responsibilities were refocused, and its powers expanded. Similarly, the asset declaration policy was broadened, and transparency requirements strengthened. This commitment also introduced, for the first time in Senegal and French-speaking Africa, specific legislation on the protection and status of whistleblowers. This commitment reached a substantial level of completion, as some milestones were adjusted during implementation to reflect changes in context.

Under the first milestone, OFNAC advocated for the adoption of the bills passed by the Council of Ministers on 22 November 2023 and the signing of their implementing decrees.<sup>36</sup> The National Assembly enacted two amending laws in February 2024 regarding OFNAC and asset declarations. President Bassirou Diomaye Faye’s government advanced the necessary implementing decrees after taking office. Additionally, Prime Minister Ousmane Sonko, announced, in April 2025, further reforms to the OFNAC to establish a new political culture rooted in transparency and accountability.<sup>37</sup>

Initially, OFNAC was established as an independent body attached to the Presidency, with 12 members serving a single five-year term, empowered for prevention, detection, and repression of corruption, fraud, and related offenses. Law No. 2012-30 limited OFNAC's powers and resources to tackle complex corruption networks.<sup>38</sup> Short term periods, a narrow scope (excluding full coverage of illicit enrichment), and judicial conflicts hampered effectiveness. To address these challenges, the law was amended on 9 February 2024<sup>39</sup> with the addition of coercive powers, an extended seven-year term, and better coordination.<sup>40</sup> The law broadened OFNAC's authority, addressing gaps amid governance challenges and political tensions, aiming to enhance investigations and transparency.

As a step further, Law No. 2025-12<sup>41</sup> repealed the previous OFNAC structure to establish its independent administrative authority focused solely on corruption.<sup>42</sup> Major changes included an exclusive focus on corruption (fraud and audits were transferred to the Court of Accounts/State Inspectors General), additional jurisdiction (citizen reporting and whistleblowers, asset freezing, asset declaration checks, penal mediation, and international cooperation), withdrawn custody (reserved for the judiciary), and transparency strengthened through mandatory public annual reports aligned with international standards.<sup>43</sup>

Additionally, the new Law reforms the recruitment process for the 12 OFNAC members to ensure greater independence and expertise. Appointments are now made through a competitive public selection by a parliamentary committee, prioritizing anticorruption specialists, legal experts, and professionals with proven integrity records.<sup>44</sup> This replaces the prior presidential nomination system, and includes mandatory background checks and fixed non-renewable terms. The 12 new members were appointed following these new procedures and their appointment decree signed 27 November 2025. Two representatives are drawn directly from civil society organizations.<sup>45</sup> The vice president of OFNAC, Birahim Seck, brings extensive experience as the former national coordinator of Forum Civil, Senegal's prominent anticorruption NGO.

A representative from Article-19 West Africa noted that these reforms were already showing positive effects. He cited an unprecedented publication of reports in early 2026 and expressed hope for continued progress, including a forthcoming status report on pending corruption cases.<sup>46</sup>

### *Asset declarations*

The second reform expanded the scope of asset declarations. Law No. 15/2025 thoroughly reforms the texts of 2014 and 2024. The 2024 law limited those subject to declaration to high-ranking officials, parliamentarians, and ministers. The new law expands the scope to all public agents and budget managers exceeding 500 million FCFA.<sup>47</sup> While the 2024 law required basic declarations of direct assets and debts, the 2025 version mandates greater content including indirect assets, detailed liabilities, and conflicts of interest.<sup>48</sup>

It also systematizes OFNAC's declaration monitoring with mandatory prior discharge issuance and greater sanctions. Sanctions were formerly limited to fines and professional bans, but now include prison terms (6 months to 4 years), a fine equal to 1/3 of assets, and ineligibility. The procedure also adds a prior formal notice and periodic updates. However, the law does not authorize the publication of declarations and instead explicitly maintains their confidentiality.

### *The Whistleblower Protection Act*

The National Assembly passed the Whistleblower Protection Act on August 26, 2025 (Milestone 3). Senegal now stands out as having the only whistleblower protection law in French-speaking

West Africa. A representative from Forum Civil noted that civil society advocacy played a significant role in its adoption.<sup>49</sup> The Platform for the Protection of Whistleblowers in Africa (PPLAAF)<sup>50</sup> acknowledged the urgency of the law's adoption but flagged that there was limited opportunity to engage in the drafting process.<sup>51</sup> After the government announced its intention to adopt a bill, PPLAAF targeted parliamentarians to prepare them for debates on whistleblower protections.<sup>52</sup> The law ultimately resulted from a government bill adopted by the National Assembly within less than a year. Decree No. 2025-1836 initiated implementation of the law on 18 November 2025. It outlines procedures for collecting and processing reports, details whistleblower protections and safeguards for collected information, and addresses self-reporting and asset recovery, and the operations of a recovery fund.<sup>53</sup>

The law provides for anonymity for whistleblower reports, with identity disclosure reserved exclusively for judicial authorities upon the whistleblower's consent. Reports may be filed via internal channels, external authorities, or publicly if standard channels prove ineffective. The law stipulates that criminal and civil immunity protects whistleblowers acting in good faith and provide rewards for whistleblowers of up to 10% of the amount recovered. Individuals involved in corruption can also benefit from a "second chance" by self-reporting before investigation and restituting funds.<sup>54</sup>

PPLAAF noted various shortcomings in the law not clarified by the implementing decree. These include an opportunity to expand the law's scope beyond corruption to encompass all public-interest concerns, such as human rights violations and environmental harm. They also call for a clear distinction between whistleblower status and that of a "front man," the introduction of specific deterrent sanctions against perpetrators of retaliation, and clarification of the relationship between OFNAC and the National Office for the Recovery of Criminal Assets.<sup>55</sup> PPLAAF's current priority is raising awareness and building capacities on the law, considering that its implementation will highlight areas for improvement. PPLAAF developed guides to help various stakeholders understand the law and to help potential whistleblowers use the law, published in 2026.<sup>56</sup>

### *Dissemination of anticorruption laws*

The final milestone sought to popularize the national anticorruption strategy and the laws on asset declaration and OFNAC. As Senegal's national anticorruption strategy ended in 2024, priority was given to disseminating the OFNAC and the asset declaration laws. The strategy's evaluation is currently underway and should enable a new strategy to be developed according an OFNAC representative.<sup>57</sup> The three laws passed in 2025 on the fight against corruption were mainly published on Senegal's OGP website and disseminated by the media, pending planned updates to the OFNAC website.

Implementation of this commitment benefited from strong government backing from the outset and has been widely welcomed by stakeholders. ARTICLE 19's representative confirmed that the reforms fully align with their expectations.<sup>58</sup> Forum Civil's representative<sup>59</sup> noted that these changes position Senegal to exit the Corruption Perceptions Index "red zone;" Senegal's 2024 score was 45 out of 100.<sup>60</sup> The commitment holder affirmed that the reforms are expected rebuild public trust in state institutions.<sup>61</sup>

### **Looking Ahead**

Efforts to strengthen Senegal's anticorruption framework are expected to continue, including in the next action plan. Continued implementation of the new legislation will be essential to fully realizing their potential. Looking ahead to the third action plan, reforms can consider:

- **Strengthening OFNAC:** OFNAC can continue public outreach and make the new laws available on their website. Civil society can support transparency by monitoring activities and publication effectiveness, including judicial case status updates.
- **National Anticorruption Strategy:** OFNAC could initiate discussions on the next anticorruption strategy for implementing, coordinating, and evaluating reforms. This strategy could draw inspiration from Senegal 2050's vision of exemplary governance (centered on accountability, citizen engagement, and anticorruption) and the fourth pillar of the national sustainable development strategy.<sup>62</sup>
- **Asset Declaration:** Civil society could initiate discussions with the government on publishing asset declarations. Although the law mandates confidentiality, these deliberations might identify key public offices (e.g., the president, ministers, and parliamentarians) for whom publication could become mandatory. This approach could align Senegal with international standards, particularly UNCAC recommendations.<sup>63</sup> In the meantime, Senegal could draw inspiration from Côte d'Ivoire, which publishes current and disaggregated statistics on declarations online.<sup>64</sup>
- **Whistleblower Protection:** The government could expedite the appointment of dedicated representatives to receive alerts, while allocating a minimum operating budget. OFNAC and partners could lead training and sensitization campaigns to address perceptions of denunciation as betrayal.
- **Institutional Coordination:** The government could clarify coordination between The National Office for the Recovery of Criminal Assets (ONRAC), OFNAC, and the special recovery fund to streamline asset recovery and reward distribution. This could involve issuing additional decrees or revising the current decree to account for the clarifications requested by civil society organizations.

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<sup>2</sup> *Id.*

<sup>3</sup> Maria Soledad Gattoni, "Opening Civic Spaces, Together," United Nations Development Programme (UNDP), 18 Feb. 2026, <https://www.undp.org/blog/opening-civic-spaces-together>; United Nations Development Programme (UNDP), *Promoting Participation Pathways for Human Development – 3P4D Initiative*, Jan. 2026, <https://www.undp.org/sites/g/files/zskgke326/files/2026-01/3p4d-results.pdf>.

<sup>4</sup> Open Government Partnership, "The Open Gov Challenge," accessed 24 Mar. 2026, <https://www.opengovpartnership.org/the-open-gov-challenge/>.

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- <sup>11</sup> Matar Sall (Forum Civil Coordinator), interview by IRM researcher, 27 Dec. 2025.
- <sup>12</sup> Abdoulaye Ndiaye, (ARTICLE 19 Senegal and West Africa, Regional Lead, OGP MSF Co-Chair), interview by IRM researcher, 23 and 26 Dec. 2025.
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- <sup>14</sup> ARTICLE 19 Sénégal et Afrique de l’Ouest and Africa Freedom of Information Centre (AFIC), “Sénégal : La promulgation de la loi sur l’accès à l’information, une étape importante pour la transparence [Senegal: Enactment of the Access to Information Act marks an important step toward transparency],” AFIC, 1 Oct. 2025, <https://www.africafoicentre.org/senegal-la-promulgation-de-la-loi-sur-lacces-a-linformation-une-etape-importante-pour-la-transparence/>.
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- <sup>53</sup> Law No. 2025-14 Status and Protection of Whistleblowers. Republic of Senegal. 4 September 2025. <https://pgo.sn/wp-content/uploads/2025/10/LOI-n%C2%B0-2025-14-portant-statut-et-protection-des-lanceurs-dalerte.pdf>
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<sup>59</sup> Sall, interview.

<sup>60</sup> Malick Gaye, “Indice de la corruption : Le Sénégal toujours dans le rouge [Corruption Index : Senegal still in the red],” *Le Quotidien*, 12 Feb. 2025, <https://lequotidien.sn/rapport-indice-de-perception-de-la-corruption-timide-progres-pour-le-senegal/>.

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## Section III. Participation and Co-Creation

**Importantly, Senegal created spaces for government and civil society to collaborate by formally establishing a National Steering Committee and Sectoral Technical Committees during the implementation period. Senegal also launched an OGP website and monitoring forms; efforts continue to update the website and institute a monitoring process.**

### OGP in Senegal

Leadership of OGP in Senegal is shared by civil society and government and overseen by the Directorate for the Promotion of Good Governance (DPBG) within the Ministry of Justice. The National Steering Committee (NSC) comprises nine members each from government and civil society. Article-19 West Africa remained the Civil Society Co-Chair and worked closely with their government counterpart in DPBG to oversee the process. A ministerial decree establishing the NSC creation, composition, and operations was issued on 20 June 2024.<sup>1</sup>

During implementation, the NSC underwent significant composition changes due to the presidential election in February 2024, starting with the OGP focal point minister. Since the second National Action Plan's development, four Justice ministers have served, the most recent appointed in September 2025.<sup>2</sup> Similarly, the former DPBG Director, serving as NSC Co-Chair, changed in April 2024. Changes also affected the Technical Coordination Secretariat members and some commitment holders. Civil society saw fewer shifts, with only two representatives replaced.

Both government and civil society seek to expand the NSC. The DPBG representative<sup>3</sup> proposes 22 members (11 per side), while civil society<sup>4</sup> calls for broader organizational involvement amid growing interest. Per procedure, interested organizations must submit a letter to the CSO lead contact, evaluated against internal regulation criteria. The civil society platform (P-OSC-PGO), supported by AFD and Expertise France, is renewing its steering committee presence. The P-OSC-PGO rules of procedure were adopted, with publication expected; several membership applications have already been received.

Public communication on OGP also improved later in the implementation period. With PAGOF support, Senegal launched its OGP website,<sup>5</sup> which was being finalized at the time of writing. Key content available includes action plans and recently enacted laws (Commitments 1 and 3). Additional OGP information can be found on Google Drive,<sup>6</sup> Facebook, and LinkedIn pages.<sup>7</sup> While a notable improvement, opportunities remain to enhance government-civil society coordination and communication, starting with documenting implementation progress and completing website updates.<sup>8</sup>

Senegal's OGP process lacks a dedicated budget. Reformers have relied on participating institutions' budgets and support from PAGOF and USAID (prior to its withdrawal). The technical committee relies on the DPBG budget. As a member noted,<sup>9</sup> this situation has constrained participation, limiting meetings, stakeholder motivation, and delayed NAP 3 co-creation, especially with DPBG's reduced funding next year. CSOs have occasionally funded steering committee activities, such as the NAP 2 evaluation workshop, using partner support. While these constraints have hindered progress, the steering committee and secretariat are seeking solutions

for the next action plan. A meeting with stakeholders and the focal point minister is planned for early 2026 to address committee funding and the third National Action Plan projections.<sup>10</sup>

### **Action Plan Co-Creation**

Senegal's second action plan was developed in four stages: facilitator training, citizen consultations, drafting, and action plan validation. The process began in October 2023, when the NSC created a roadmap detailing the stages and deadlines.<sup>11</sup> This was followed by facilitator training<sup>12</sup> and citizen consultations across 14 regions.<sup>13</sup> Around 400 participants joined in-person workshops led by joint administration and civil society teams from the committee. Held from 2–17 November 2023, these consultations organized participants into working groups to propose maintaining, revising, deleting, or adding commitments. A convergence and drafting workshop<sup>14</sup> followed on 30 November 2023, uniting committee members and local stakeholders to finalize priority commitments. The consolidation and validation workshop marked the final stage.<sup>15</sup> Held 14–15 December 2023, it gathered prior stakeholders plus identified commitment leads, where the eight commitments were selected.

Overall, stakeholders deemed the second National Action Plan's co-creation inclusive. The DPBG representative<sup>16</sup> praised civil society's commitment and passion for OGP, while the Civil Society Co-Chair<sup>17</sup> noted marked improvement in public participation over the prior process. Nevertheless, implementation revealed ownership challenges among some commitment holders.<sup>18</sup> During the upcoming co-creation process, the National Steering Committee could engage relevant institutions to ensure they fully understand and agree to commitment objectives and milestones.

### **Participation During Implementation**

The formal establishment of the National Steering Committee, Technical Coordination Secretariat, and Sectoral Technical Committees (STCs) institutionalized greater collaboration between civil society and government in the second half of the implementation period. STCs include two representatives each from civil society and the administration with the aim to facilitate and monitor progress. Throughout implementation, steering committee members, sectoral committees, and commitment holders held several meetings. The steering committee convened on 11 February, 15 April, 3 July, and 15 December 2025.<sup>19</sup> These meetings involved problem solving and commitment progress monitoring and evaluation. The DPBG highlighted the strong involvement of civil society, including in the mobilization of funding, which led to the success of Commitments 1 and 3.<sup>20</sup> Although civil society noted some difficulties in taking ownership of the commitments and OGP's rules and standards, interviewees recognized the administration's genuine desire to improve the process, despite the lack of resources and the implementation challenges.<sup>21</sup> The progress made in formalizing OGP in Senegal promises to facilitate collaboration and communication around implementation of the third action plan. Moving forward, the NSC could ensure that monitoring forms are completed and published on OGP platforms, to best aid in learning, transparency, and accountability.

## **Table 2. Compliance with Minimum Requirements**

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.<sup>22</sup> Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each

standard.<sup>23</sup> The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.<sup>24</sup>

Minimum requirement	Co-creation	Implementation
<b>1.1 Space for dialogue:</b> The National Technical Committee (NSC) comprises nine government members and nine from civil society, who co-chair it. A ministerial decree establishing its creation, composition, and operations was issued on 20 June 2024. <sup>25</sup> The NSC met seven times in 2024 (3 July, 5 September, and 23 December) and 2025 (11 February, 15 April, 3 July, and 2 October). Information on the NSC and Sectoral Technical Committees are available on the Senegal OGP website. <sup>26</sup>	Yes	Yes
<b>2.1 OGP website:</b> Senegal launched an OGP website with PAGOF support, <sup>27</sup> which was being updated at the time of writing. It includes action plans and recently passed laws. <sup>28</sup> Senegal also maintains an OGP Facebook <sup>29</sup> and active LinkedIn page. <sup>30</sup>	Yes	Yes
<b>2.2 Repository:</b> Information on co-creation and implementation was available on Senegal’s Google Drive, <sup>31</sup> Facebook, <sup>32</sup> and LinkedIn. <sup>33</sup> However, evidence of implementation was not available for all commitments.	Yes	Yes
<b>3.1 Advanced notice:</b> See the Action Plan Review <sup>34</sup>	No	Not applicable
<b>3.2 Outreach:</b> See the Action Plan Review	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> See the Action Plan Review	Yes	Not applicable
<b>4.1 Reasoned response:</b> See the Action Plan Review	Yes	Not applicable
<b>5.1 Open implementation:</b> The government met with civil society stakeholders during implementation. They met four times in 2025, as required by their rules of procedure: on 11 February (final approval of the rules of procedure and the Senegal OGP website); 15 April (preparations for the Nairobi summit and review of the second action plan’s commitments); 3 July (validation of the Senegal OGP website), and 2 October (preparations for the action plan evaluation workshop). <sup>35</sup> Implementation results were presented and opportunity made for civil society to comment in these meetings. <sup>36</sup>	Not applicable	Yes

<sup>1</sup> “Decree on the creation and organization of the Open Government Partnership National Steering Committee.” Ministry of Justice. Republic of Senegal. 20 June 2024. Document shared with the IRM researcher.

<sup>2</sup> Présidence de la République du Sénégal, “Liste complète des membres du nouveau gouvernement [Full list of members of the new government],” Communiqués, 6 Sep. 2025, <https://www.presidence.sn/fr/actualites/liste-complete-des-membres-du-nouveau-gouvernement>.

<sup>3</sup> Abdoul Diao (Legal Officer, Head of the Institutional Governance Division at DPBG) interview by IRM researcher, 12 Dec. 2025.

<sup>4</sup> Abdoulaye Ndiaye, (ARTICLE 19 Senegal and West Africa, Regional Lead, OGP MSF Co-Chair), interview by IRM researcher, 23 and 26 Dec. 2025.

<sup>5</sup> Open Government Senegal, “Partenariat pour un Gouvernement Ouvert (PGO) [Open Government Partnership (OGP)],” accessed 12 Mar. 2026, <https://pgo.sn/>.

<sup>6</sup> OGP Senegal, “Google Drive Folder: Supporting Documents,” accessed 24 Mar. 2026, [https://drive.google.com/drive/folders/1\\_PqF2HqZB6MUIhJl9fGGDzSNbffyGbd](https://drive.google.com/drive/folders/1_PqF2HqZB6MUIhJl9fGGDzSNbffyGbd).

<sup>7</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Homepage], accessed 24 Mar. 2026, <https://web.facebook.com/profile.php?id=61551495163279&rdc=1&rd;Plateforme-OSC-PGO-Sénégal> [LinkedIn Homepage], accessed 24 Mar. 2026, <https://www.linkedin.com/in/plateforme-osc-pgo-sénégal-6a50ab356/>.

<sup>8</sup> Partenariat pour un Gouvernement Ouvert (PGO) Sénégal, “Actualités [News],” accessed 24 Mar. 2026, <https://pgo.sn/actualites/>.

<sup>9</sup> Diao, interview.

<sup>10</sup> Ndiaye, interview.

- <sup>11</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Post], 6 Nov. 2023, <https://web.facebook.com/share/p/17Umsdr41C/>.
- <sup>12</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Post], 2 Nov. 2023, <https://web.facebook.com/share/p/1FUAFqkG6C/>.
- <sup>13</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Post], 2 Nov. 2023, <https://web.facebook.com/share/p/1ExgWfySTQ/>.
- <sup>14</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Post], 5 Dec. 2023, <https://web.facebook.com/share/p/1DSRwQ7mwP/>.
- <sup>15</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Post], 14 Dec. 2023, <https://web.facebook.com/share/p/1JyBPHHiBS/>.
- <sup>16</sup> Louis Robert Shenghor, (Legal Officer, Head of the Studies and Planning Division at DPBG), interview by IRM researcher, 12 Dec. 2025.
- <sup>17</sup> Ndiaye, interview.
- <sup>18</sup> Diao, interview; Séné Boury Ba (Head of the Modernization Division, Directorate of Public Sector Transformation (DTSP) [ministry in charge of the civil service]), interview by IRM researcher, 27 Dec. 2026.
- <sup>19</sup> Documents made available to the IRM researcher.
- <sup>20</sup> Diao, interview.
- <sup>21</sup> Ndiaye, interview.
- <sup>22</sup> Open Government Partnership, “OGP Participation & Co-Creation Standards,” 24 Nov. 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.
- <sup>23</sup> Open Government Partnership, *IRM Guidelines for Assessment of Minimum Requirements*, 31 May 2022, [https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements\\_20220531\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf).
- <sup>24</sup> On 1 August 2025, the OGP Criteria and Standards Subcommittee adopted a resolution on Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation, for all members currently implementing plans delivered on or after 1 January 2024. See <https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf>. For information on the OGP Procedural Review Policy see <https://www.opengovpartnership.org/procedural-review/#IC>.
- <sup>25</sup> “Decree on the creation and organization of the Open Government Partnership National Steering Committee.” Ministry of Justice. Republic of Senegal. 20 June 2024. Document shared with the IRM researcher.
- <sup>26</sup> Open Government Senegal, “Partenariat pour un Gouvernement Ouvert (PGO) [Open Government Partnership (OGP)].”
- <sup>27</sup> *Id.*
- <sup>28</sup> Partenariat pour un Gouvernement Ouvert (PGO) Sénégal, “Actualités [News].”
- <sup>29</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Homepage], accessed 24 Mar. 2026, <https://www.facebook.com/people/Open-Government-Partnership-Senegal-OGP-SEN/61551495163279/>.
- <sup>30</sup> Plateforme-OSC-PGO-Sénégal, [LinkedIn Homepage], accessed 24 Mar. 2026, <https://www.linkedin.com/in/plateforme-osc-pgo-s%C3%A9n%C3%A9gal-6a50ab356/>.
- <sup>31</sup> OGP Senegal, “Google Drive Folder: Supporting Documents.”
- <sup>32</sup> Open Government Partnership Senegal - OGP SEN, [Facebook Homepage].
- <sup>33</sup> Plateforme-OSC-PGO-Sénégal, [LinkedIn Homepage].
- <sup>34</sup> Open Government Partnership, *Senegal Action Plan 2023–2025 (December)*, 8 Jan. 2024, <https://www.opengovpartnership.org/documents/senegal-action-plan-2023-2025-december/>.
- <sup>35</sup> Meeting reports made available to the IRM researcher.
- <sup>36</sup> Fatou Mbar Faye, “Atelier National d’Evaluation du Plan d’Action National 2 (PAN2) et de Lancement de la Co-création du Plan d’Action National 2026-2027 (PAN3) du Partenariat pour un Gouvernement Ouvert (PGO) au Sénégal [National Workshop to Assess NAP 2 and Kick Off NAP 3 Co-Creation for Senegal’s Open Government Partnership (OGP)],” Dakar midi, 10 Dec. 2025, <https://www.dakarmidi.net/actualite/justice/atelier-national-devaluation-du-plan-daction-national-2-pan2-et-de-lancement-de-la-co-creation-du-plan-daction-national-2026-2027-pan3-du-partenariat-pour-un-gouvernement-ouvert-pgo-au-sen/>.

## Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.<sup>1</sup>

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>2</sup> The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

### Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objectives, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes toward:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes toward:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes toward:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Aimé Sawadogo and was reviewed by Dr. Elijah Ambasa, an IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM’s International Experts Panel (IEP).<sup>3</sup> For more information, refer to IRM webpage<sup>4</sup> or the glossary of IRM and OGP terms.<sup>5</sup>

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<sup>1</sup> For definitions of OGP terms, such as co-creation and promising commitments, see “OGP Glossary,” <https://www.opengovpartnership.org/glossary/>.

<sup>2</sup> The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “Potential for Results” and “Early Results” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

<sup>3</sup> “International Experts Panel,” Open Government Partnership, Independent Reporting Mechanism, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>.

<sup>4</sup> “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview/>.

<sup>5</sup> “OGP Glossary,” Open Government Partnership, <https://www.opengovpartnership.org/glossary/>.

## Annex I. Commitment Data<sup>1</sup>

<b>Commitment 1: Access to Information Bill</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> Significant Results</li> </ul>
This commitment is assessed in Section II, above.	
<b>Commitment 2: Budget Transparency and Participatory Budgeting</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Unclear</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>This commitment aimed to enhance transparency in public finance management, strengthen budgetary oversight, and institutionalize participatory budgeting in local authorities. It was to be jointly implemented by the Budget Programming Directorate and the Directorate for Local Authorities. Coordination challenges foreseen in the IRM Action Plan Review ultimately hindered progress.<sup>2</sup> As the IRM did not receive information from commitment implementers, a lack of evidence limited comprehensive IRM assessment of this commitment’s completion and early results.<sup>3</sup></p> <p>However, a civil society representative<sup>4</sup> noted partial implementation of milestones. These included training civil society on program budgeting, execution, monitoring, and control (Milestones 1–2) and sessions analyzing quarterly budget execution reports (Milestone 4). Regarding Milestone 5, some budget documents were published, but civil society remained unsatisfied. Civil society members invited the government to comply with the public finance transparency code, arguing that the budget process was neither inclusive nor participatory.<sup>5</sup> The Article-19 representative<sup>6</sup> noted that budgetary constraints (stemming from withdrawal USAID funding that supported the structures backing this initiative) may have hindered the creation of simplified budget documents (Milestone 8). Milestone 9 sought support for 20 local authorities in participatory budgeting. The regions of Rufisque and Pikine reportedly expressed interest in participatory budgeting, with consultation frameworks established. Advocacy for revising the Local Authorities Code (Milestone 10) advanced to the National Assembly level but lacked the necessary support<sup>7</sup>.</p> <p>Overall, merging participatory budgeting with budget transparency goals, alongside institutional shifts in the Local Authorities Directorate, hampered completion.<sup>8</sup> This commitment faced similar challenges in the first and second action plan. With a view to its renewal in the third National Action Plan, the National Steering Committee could explore ways to strengthen ownership and coordination among commitment holders.</p>	
<b>Commitment 3: Strengthen the National Office for the Fight against Fraud and Corruption</b>	

<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Substantial</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Early results:</b> Significant Results</li> </ul>
<p>This commitment is assessed in Section II, above.</p>	
<p><b>Commitment 4: Join the Fisheries Transparency Initiative (FITI)</b></p>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Senegal renewed this commitment from the first Action Plan, aiming to complete the process of joining FiTI and thus strengthen governance in the fisheries sector. Key milestones for adopting FiTI-implementing text, establishing a multipartite group and FiTI National Secretariat, and submission of Senegal's membership application to the FiTI Board of Directors were not completed. As a result, Senegal was delisted as a committed country by the FiTI Secretariat during the implementation period.<sup>9</sup> Therefore, the government would need to renew its public commitment and restart the FiTI accession process.</p> <p>A Multistakeholder Group and FiTI national secretariat (Milestones 3, 4, and 5) were not established. Momentum was likely impacted by the change of government following elections. Civil society advocated for resumption of the FiTI process (Milestones 1 and 2). For instance, ARTICLE 19 with Forum Civil hosted a panel on FiTI accession prospects on 23 January 2025,<sup>10</sup> while the National Coalition for Sustainable Fisheries (CONAPED) convened a 31 January 2025 meeting with the National Assembly's Sustainable Development Committee to highlight fishery sector challenges.<sup>11</sup> In a joint statement dated 22 May 2025,<sup>12</sup> civil society organizations invited the government to restart the process.</p> <p>Stakeholders<sup>13</sup> acknowledge that the process faces challenges to get back on track, due to coordination obstacles, delays in addressing stakeholder requests, and the need for more structured communication channels within the ministry responsible for fisheries, despite the President's reaffirmed commitment to promoting more inclusive and transparent fisheries governance.<sup>14</sup> Nevertheless, stakeholders remain optimistic about relaunching the process, citing recent positive signals.</p> <p>Meetings and discussions have been ongoing since October and November 2025 between the Secretary General of the Ministry of Fisheries (MPEM) and the FiTI regional coordination (Milestone 5). The FiTI regional coordinator for French-speaking Africa reports sending a reminder letter for membership—accompanied by a draft memorandum of understanding—to the Ministry of Fisheries in December 2025, requesting a relaunch of the FiTI process.<sup>15</sup> He states that constructive discussions with MPEM, alongside interest from technical partners, signal potential for significant progress in 2026, provided a clear political decision is made. He recommends that the Minister of Justice formally refer the matter to the Minister of Fisheries and the President, reminding them that FiTI accession is a Government of Senegal commitment</p>	

under the OGP Action Plan.<sup>16</sup> Similarly, the PGO representative suggests revising the commitment in the next action plan as “FiTI membership”, given the planned renewal.<sup>17</sup>

**Commitment 5: Improve User Access to a Quality Public Service**

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|--|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b><br/>No</li> <li>• <b>Potential for results:</b> Unclear</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|--|--|

Commitment 5 aimed to improve public-service user satisfaction by enhancing access to government services and their overall quality, particularly regarding justice service centers. This commitment was assessed to have an unclear Potential for Results in the Action Plan Review as it was not clear how it would help government become more transparent, accountable, or participatory.

The development, dissemination, and implementation of the national strategy for public service reception and orientation (Milestone 1) was underway as of December 2025, per the commitment holder.<sup>18</sup> A consultant was hired in 2024, but activities were suspended due to insufficient funding. In 2025, following adoption of the new national public service transformation agenda, work resumed with the same consultant, who is finalizing the assessment. Milestone 2 provided for the continued establishment of reference and reception offices. However, the commitment holder noted the 14 offices were already operational since 2022.<sup>19</sup> Advocacy was ongoing for the adoption of the general code of ethics and professional conduct for public officials (Milestone 3). An internal draft was submitted in 2024 to the government, following validation by the Supreme Court, and awaits approval by the Council of Ministers.

Due to coordination and communication challenges among implementing actors, the commitment holder lacked complete information on milestones overseen by various departments. Civil society highlighted this departmental diversity as the primary implementation obstacle and noted that the new public service agenda has somewhat shifted the commitment's trajectory.<sup>20</sup> The commitment holder notes that certain milestones required adjustments that were not carried out. The commitment is planned for renewal in the next action plan. He therefore recommends that it be led by the Civil Service Transformation Department.<sup>21</sup> In renewing the commitment, the IRM recommends:

- Strengthening the open government focus, such as by enhancing public feedback channels (e.g., comments or complaints) on public service quality.
- Clarifying stakeholder roles and coordination mechanisms and engaging the relevant and committed government entities and civil society partners.

**Commitment 6: Access for People with Disabilities to Basic Social Services**

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|--|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b><br/>No</li> <li>• <b>Potential for results:</b> Unclear</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> No Evidence Available</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|--|--|

Carried over from the previous action plan, this commitment aimed to improve the provision of government services and social inclusion for people with disabilities. While an important reform, the IRM assessed this commitment in both the first and second action plans to have an unclear Potential for Results due to a lack of clear connection to open government. As with the previous commitment, a lack of evidence impacted the IRM’s ability to assess completion and early results.<sup>22</sup>

If carried over into the third action plan, the IRM recommends that the commitment is amended to clearly articulate how the reform would make government more transparent, accountable, or participatory to the public. For instance, the commitment could become relevant to open government if it enables persons with disabilities to influence government policy, provide feedback on public services, or report discrimination or lack of equal access. Additionally, the IRM recommends developing a process to periodically monitor, document, and share progress on implementation.

The milestones included: compliance with the minimum quota of 15% allocated to disabled people for access to employment; advocating adoption of implementing texts for the social orientation law; organization of the Presidential Council on Disability; creating a call center and the High Authority for Equal Opportunities; and establishing a support fund for people with disabilities.

Reportedly, since September 2025, Senegal has been developing a national policy to promote inclusion in the vocational training sector.<sup>23</sup> This policy aims to adapt educational content, training programs, and infrastructure to the needs of people with disabilities, accompanied by an action plan addressing key social inclusion challenges. Meanwhile, in 2024, 23,037 equal opportunity cards were issued, bringing the cumulative total to 98,126 to support social inclusion of persons with disabilities.<sup>24</sup> There are plans to reach 705,000 by 2029, according to the director of disability protection as reported by the local press.<sup>25</sup>

**Commitment 7: Citizen Participation in Public Policies**

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b><br/>Yes</li> <li>• <b>Potential for results:</b> Unclear</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|---|--|

Commitment 7 aimed to strengthen citizen participation in the formation, implementation, monitoring, and evaluation of public policies. Carried from the previous action plan, this commitment is supported by the General Directorate of Planning and Economic Policies (DGPPE) of the Ministry of Economic Planning and Cooperation. The potential financial and coordination challenges noted in the IRM Action Plan Review impacted implementation.<sup>26</sup> As with this commitment in the previous action plan, an absence of evidence online or response to interview requests inhibited the IRM’s ability to fully assess completion or early results.<sup>27</sup>

Desk research indicates that consultation frameworks were organized, leading to a diagnostic report on public services in July 2025. While it is difficult to establish a direct link with the document that the National Agency for Statistics and Demographics (ANSD) must produce

under Milestone 1, the report highlights the observations, complaints, and criticisms expressed by various users regarding public service delivery. It includes recommendations like creating complaint management spaces to involve citizen-users in implementing public services. Additionally, a workshop was organized in September 2025 to form local elected officials' contributions to the Joint Annual Review (Milestone 3)<sup>28</sup>. According to a report,<sup>29</sup> public consultations took place between May and June 2025 in the central (Kaolack), southern (Ziguinchor), and northern (Saint-Louis) hubs as part of implementing the SDG-oriented Investment Map (Milestone 4). Civil society, via the CASC (National Commission of Civil Society Actors for Monitoring Economic and Social Policy), also prepared its contribution to the Joint Annual Review (Milestone 7), while a workshop—supported by the DGPPE—to develop a methodological note for civil society's alternative report was held in November 2024. Regarding the decentralization charter (Milestone 6), the Ministry in charge of the civil service indicated that it will reassess it at the Prime Minister's request, and its dissemination was discussed.<sup>30</sup>

**Commitment 8: Local Open Government**

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b><br/>Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
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This commitment aimed to promote open government principles at the territorial level. Its objective was to improve coordination between national and local OGP efforts by leveraging Regional Development Cells (CRDs) to support local authorities in local open government. To achieve this, planned activities included awareness-raising and capacity-building for open government, supporting CRD operations, and establishing a multistakeholder forum.

However, as documented in the Action Plan Review,<sup>31</sup> the initial vision shifted with the new DPBG Director's arrival, who favored a broader good governance strategy. The DPBG representative also stated that the commitment's wording was unclear.<sup>32</sup> While some awareness efforts occurred, such as a good governance caravan covering open government,<sup>33</sup> this commitment did not significantly advance the principle of open local governance in Senegal. The USAID withdrawal also hindered commitment implementation, as it was expected to support regional governance units (CRG) operations (Milestone 2).<sup>34</sup>

The National Steering Committee plans to renew the commitment in the third national action plan. With this in mind, the IRM recommends that the NSC draw on the Moroccan network of open local authorities as a model for advancing local open government.<sup>35</sup>

<sup>1</sup> Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see Senegal's action plan: <https://www.opengovpartnership.org/documents/senegal-action-plan-2023-2025-december/>.
3. For more information on the assessment of the commitments' design, see Senegal's Action Plan Review: <https://www.opengovpartnership.org/documents/senegal-action-plan-review-2023-2025/>.

- <sup>2</sup> Open Government Partnership, *Senegal Action Plan Review 2023–2025*, 9 Dec. 2024, <https://www.opengovpartnership.org/documents/senegal-action-plan-review-2023-2025/>.
- <sup>3</sup> The IRM researcher did not receive a response from the commitment holder to emails sent on 20 and 30 January or to WhatsApp inquiries made on 22 December and 8, 14, and 16 January 2026. Following desk research, the IRM found no evidence available on the commitment milestones' implementation.
- <sup>4</sup> Abdoulaye Ndiaye, (ARTICLE 19 Senegal and West Africa, Regional Lead, OGP MSF Co-Chair), interview by IRM researcher, 23 and 26 Dec. 2025.
- <sup>5</sup> Budget Senegal, "Les OSC sénégalaises appellent au respect du code de transparence dans la gestion des finances publiques [Senegalese CSOs call for compliance with the transparency code in public finance management]," 5 Aug. 2025, <https://fr.senegal.budget.org/2025/08/06/1770/>.
- <sup>6</sup> Ndiaye, interview.
- <sup>7</sup> *Id.*
- <sup>8</sup> Louis Robert Shenghor, (Legal Officer, Head of the Studies and Planning Division at DPBG), interview by IRM researcher, 12 Dec. 2025.
- <sup>9</sup> Sven Biermann, "FiTI International Board delists Senegal from the Fisheries Transparency Initiative," Fisheries Transparency Initiative, 14 Aug. 2024, <https://fiti.global/fiti-international-board-delists-senegal-from-the-fisheries-transparency-initiative>.
- <sup>10</sup> ARTICLE 19 Sénégal & Afrique de l'ouest, [LinkedIn post], accessed 24 Mar. 2026, [https://lnkd.in/e\\_R7S9Cd](https://lnkd.in/e_R7S9Cd).
- <sup>11</sup> Télé Story Sénégal, "Atelier de formation des parlementaires et des journalistes sur les principaux textes réglementaires [Training workshop for parliamentarians and journalists on key regulatory texts]," YouTube, 3 Feb. 2025, [https://www.youtube.com/watch?v=q7vkyaH\\_DL0](https://www.youtube.com/watch?v=q7vkyaH_DL0).
- <sup>12</sup> Babou Landing Diallo, "Transparence dans la pêche : la société civile appelle le Sénégal à relancer son adhésion à la FiTI [Transparency in fishing: civil society calls on Senegal to renew its membership of FiTI]," Management Afrik, 24 May 2025, <https://afrikmanagement.com/index.php/2025/05/24/transparence-dans-la-peche-la-societe-civile-appelle-le-senegal-a-relancer-son-adhesion-a-la-fiti/>.
- <sup>13</sup> Ndiaye, interview; Shenghor, interview; Mansor Ndour (Regional Coordinator for Africa francophone, FiTI International Secretariat), correspondence with IRM researcher, 8 Dec. 2025 and 30 Jan. 2026.
- <sup>14</sup> Ministère de l'Enseignement supérieur, de la Recherche et de l'Innovation, "Conseil des ministres du jeudi 08 mai 2024 [Cabinet meeting on Thursday, 8 May 2024]," 8 May 2024, <https://mesrisenegal.sn/2024/05/08/conseil-des-ministres-du-jeudi-08-mai-2024/>.
- <sup>15</sup> Ndour, correspondence.
- <sup>16</sup> *Id.*
- <sup>17</sup> Shenghor, interview.
- <sup>18</sup> Séné Boury Ba (Head of the Modernization Division, Directorate of Public Sector Transformation (DTSP), Ministry in charge of the civil service), interview by IRM researcher, 27 December, 2026.
- <sup>19</sup> Ba, interview.
- <sup>20</sup> Ndiaye, interview.
- <sup>21</sup> Ba, interview.
- <sup>22</sup> The IRM researcher unsuccessfully requested interviews with the commitment holder by email on 1 and 3 February 2026. They also requested contact information via the PoC on 22 December 2025, and 1 and 3 February 2026. (The contact information provided did not enable them to contact the commitment holder).
- <sup>23</sup> Agence de Presse Sénégalaise (APS), "Vers l'élaboration d'un document stratégique d'inclusion du secteur de la formation professionnelle [Senegal: Towards the development of a strategic document for the inclusion of the vocational training sector]," 27 Sep. 2025, <https://aps.sn/vers-lelaboration-dun-document-strategique-dinclusion-du-secteur-de-la-formation-professionnelle/>.
- <sup>24</sup> Gouvernement du Sénégal, "Cartes d'Égalité des Chances [Equal Opportunity Cards]," accessed 24 Mar. 2026, <https://www.primature.sn/actions-et-realizations/sante-et-protection-sociale/cartes-degalite-des-chances>.
- <sup>25</sup> APS, "Plus de 98.000 cartes d'égalité des chances produites (officiel) [Over 98,000 equal opportunity cards produced (official)]," NDAR INFO, 14 Jan. 2025, [https://www.ndarinfo.com/Plus-de-98-000-cartes-d-egalite-des-chances-produites-officiel\\_a40082.html](https://www.ndarinfo.com/Plus-de-98-000-cartes-d-egalite-des-chances-produites-officiel_a40082.html).
- <sup>26</sup> Open Government Partnership, *Senegal Action Plan Review 2023–2025*; Ndiaye, interview.
- <sup>27</sup> The IRM researcher unsuccessfully requested interviews with the commitment holder by email on 18 and 30 December 2025 and 30 January 2026, and by WhatsApp on 18 and 24 December, 2025, and 14 and 19 January, 2026.
- <sup>28</sup> Direction Générale de la Planification et des Politiques Économiques (DGPPE), "Validation technique de la RAC 2025 – 10 octobre 2025 [Technical validation of RAC 2025 – 10 October 2025]," DGPPE accessed 11 Oct. 2025, <https://dgppe.sn/validation-technique-de-la-rac-2025-10-octobre-2025/>.
- <sup>29</sup> Form made available to the IRM researcher.
- <sup>30</sup> Lena Thioune, "Déconcentration: La fonction publique réévalue la Charte adoptée en 2020 sur instruction du Premier Ministre [Decentralization: On the Prime Minister's instructions, the civil service is reviewing the Charter adopted in 2020],"

Seneweb, 4 Dec. 2025, [https://www.seneweb.com/fr/news/Video/deconcentration-la-fonction-publique-reevalue-la-charte-adoptee-en-2020-sur-instruction-du-premier-ministre\\_n\\_476348.html](https://www.seneweb.com/fr/news/Video/deconcentration-la-fonction-publique-reevalue-la-charte-adoptee-en-2020-sur-instruction-du-premier-ministre_n_476348.html).

<sup>31</sup> Open Government Partnership, "Senegal Action Plan Review 2023–2025."

<sup>32</sup> Abdoul Diao (Legal Officer, Head of the Institutional Governance Division at DPBG) interview by IRM researcher, 12 Dec. 2025.

<sup>33</sup> Direction de la Promotion de la Bonne Gouvernance DPBG, "Caravane nationale de promotion des principes de bonne gouvernance [National Caravan for the Promotion of Good Governance Principles]," [Facebook video], 13 Sep. 2025, <https://www.facebook.com/watch/?v=2009433473218129&rdc=1&rdr#>.

<sup>34</sup> Diao, interview; Shenghor, interview.

<sup>35</sup> Direction Générale des Collectivités Territoriales (DGCT), "Le Réseau Marocain des Collectivités Territoriales Ouvertes [The Moroccan Network of Open Local Authorities]," accessed 24 Mar. 2026, <https://dgct.govright.tech/a-propos.php?lang=fr>.