

Fourteenth Commonwealth Regional Conference and Annual General Meeting for Heads of Anti-corruption Agencies in Commonwealth Africa

Accra, Ghana

6–11 May 2024



The Commonwealth

PROCEEDINGS OF THE

**Fourteenth
Commonwealth Regional
Conference and Annual
General Meeting
for Heads of Anti-
Corruption Agencies in
Commonwealth Africa**

Accra, Ghana
6–11 May 2024



The Commonwealth

Authored by Dr Roger Koranteng and the Economic and Organised Crime Office (Ghana)

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www.thecommonwealth.org

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Published by the Commonwealth Secretariat.

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Acronyms and Abbreviations

ACA	anti-corruption agency
AfDB	African Development Bank
AML	anti-money laundering
CEPTI	Constituency and Executive Projects Tracking Initiative (Nigeria)
CONAC	National Anti-Corruption Commission (Cameroon)
CHRAJ	Commission for Human Rights and Administrative Justice (Ghana)
COP	Commissioner of Police
CPI	Corruption Perception Index
CSO	civil society organisation
DCEC	Directorate on Corruption and Economic Crime (Botswana)
DCEO	Directorate on Corruption and Economic Offences (Lesotho)
EFCC	Economic and Financial Crimes Commission (Nigeria)
EOCO	Economic and Organised Crime Office (Ghana)
ECOWAS	Economic Community of West African States
FATF	Financial Action Task Force
FiTI	Fisheries Transparency Initiative
FCC	Financial Crime Commission (Mauritius)
GII	Ghana Integrity Initiative
IACCC	International Anti-Corruption Coordination Centre
HAPLUCIA	High Authority for Preventing and Fighting Corruption and Related Offences
ICPC	Independent Corrupt Practices and Other Related Offences Commission (Nigeria)
ICAR	International Centre for Asset Recovery
MLA	mutual legal assistance
MOU	memorandum of understanding
NACAP	National Anti-Corruption Action Plan (Ghana)

NACSAP	National Anti-Corruption Strategy and Action Plan (Namibia)
NSA	non-state actor
OAWS	Online Anonymous Whistleblowing System (Zambia)
OECD WGB	Organisation for Economic Co-operation and Development Working Group on Bribery
OSP	Office of the Special Prosecutor (Ghana)
PCCB	Prevention and Combating of Corruption Bureau (Tanzania)
SDG	Sustainable Development Goals
SHART	Sexual Harassment and Abuse Response Team (Nigeria)
UNCAC	United Nations Convention Against Corruption
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime

Message from the Host

COP Maame Yaa Tiwaa Addo-Danquah
Executive Director
Economic and Organised Crime Office, Ghana

The 14th Commonwealth Regional Conference and Annual General Meeting (AGM) for Heads of Anti-Corruption Agencies in Africa, held from 6th to 11th May 2024 at the Kempinski Gold Coast Hotel in Accra, Ghana, stands as a testament to the unwavering commitment of Commonwealth Africa to the fight against corruption. Convened under the timely and thought-provoking theme, "Strengthening Institutions and Promoting Transparency: A Means of Fighting Corruption in Commonwealth Africa," the event brought together a broad coalition of stakeholders, including representatives of anti-corruption agencies, civil society, international organisations, and strategic partners, all unified by a common objective to forge stronger, more transparent, and accountable systems of governance.

This report chronicles the rich and dynamic proceedings of the conference, an assembly that transcended ceremonial exchanges to provide a platform for critical reflection, innovative thinking, and shared learning. Organised by the Commonwealth Secretariat in collaboration with Ghana's Economic and Organised Crime Office (EOCO), the Commission on Human Rights and Administrative Justice (CHRAJ), and the Office of the Special Prosecutor (OSP), the conference offered a rare opportunity for both seasoned professionals and emerging leaders in the anti-corruption space to converge, collaborate, and renew their collective resolve.

Ghana's hosting of the 2024 edition earlier than originally scheduled was marked by both grace and efficiency. The meticulous preparation, strategic foresight, and warm hospitality extended to all participants reflected the country's deep-rooted commitment to the values of integrity and justice. From the opening ceremony to the closing discussions, Ghana emerged not only as a gracious host but also as a formidable example of how institutional reforms and policy innovations can serve as effective tools in combating corruption.

Over the course of the week, participants engaged in a range of sessions designed to address the multifaceted nature of corruption in Commonwealth Africa. Keynote addresses, expert panels, technical working groups, and strategic dialogues provided space for robust discussion on pressing issues such as cross-border financial crimes, digital solutions to governance challenges, asset recovery, whistleblower protection, and the importance of civic engagement. These exchanges illuminated both shared challenges and unique contexts across the region, highlighting the need for tailored solutions grounded in local realities but guided by global best practices.

Importantly, the conference also acknowledged the human dimension of anti-corruption work: the courage it demands, the threats it attracts, and the resilience it requires. Many of the presentations spoke not only to institutional strategies but also to the ethical imperatives that undergird our work. The remarks delivered by high-level dignitaries from the Executive Director of EOCO and the Head of Public Sector Governance at the Commonwealth Secretariat to the Assistant Secretary-General

of the Commonwealth and the Attorney General of Ghana underscored a unified message: corruption is not merely a legal or administrative problem; it is a moral and developmental crisis that undermines social cohesion, economic progress, and democratic legitimacy.

A special highlight of the conference was the renewed focus on capacity building and inter-agency cooperation. From the Commonwealth Anti-Corruption Centre in Botswana to collaborative frameworks like the International Anti-Corruption Coordination Centre (IACC), the emphasis on training, joint investigations, and technical assistance signaled a forward-looking approach. As the regional and global dimensions of corruption continue to evolve, so too must our strategies leveraging technology, enhancing legal frameworks, and investing in human capital.

The Annual General Meeting (AGM) segment of the conference provided a space for institutional accountability and strategic planning, ensuring that the Association of Anti-Corruption Agencies in Commonwealth Africa continues to evolve in ways that are responsive, impactful, and inclusive. The robust deliberations during the AGM reaffirmed the importance of collective leadership, peer learning, and shared ownership of the regional anti-corruption agenda.

As you read through the proceedings documented in this report, it is our hope that you will gain not only a deeper understanding of the issues discussed, but also an appreciation for the shared values and aspirations that bind us together in this fight. The outcomes of this conference are not ends in themselves but stepping stones toward a more transparent, just, and prosperous Commonwealth Africa.

On behalf of the Organising Committee and all our partners, I extend our deepest gratitude to the government and people of Ghana, all participating countries, international organisations, resource persons, and civil society representatives who contributed to the success of this landmark event. Your presence, perspectives, and passion have helped lay a stronger foundation for collective action going forward.

Let this report serve not just as a record of proceedings, but as a call to action a reminder that while the road ahead may be long, the destination is worth every step. Together, let us remain steadfast in our pursuit of a corruption-free future.

Introduction

This report is a record of the proceedings of the 14th Commonwealth Regional Conference and Annual General Meeting (AGM) for Heads of Anti-Corruption Agencies in Africa held from 6 to 11 May 2024 at the Kempinski Gold Coast Hotel, Accra, Ghana, under the theme 'Strengthening institutions and promoting transparency: A means of fighting corruption in Commonwealth Africa'.

The conference was convened by the Commonwealth Secretariat, the Economic and Organised Crime Office (EOCO) of Ghana, the Commission on Human Rights and Administrative Justice (CHRAJ), and the Office of the Special Prosecutor (OSP).

The objectives of the conference were as follows.

- a. To bring together anti-corruption agencies in Commonwealth Africa, relevant international organisations, and partners to share experiences, best practices and lessons for the fight against corruption.
- b. To enable the exchange of ideas and practices among anti-corruption agencies (ACAs) in Commonwealth Africa.
- c. To facilitate the sharing of expertise in areas where member agencies have a comparative advantage.
- d. To foster capacity building and enhance the ability of anti-corruption agencies to implement and update their national anti-corruption strategies effectively.
- e. To explore historical sites in the host country.

Attendance

The conference was attended by 57 representatives from 20 African states of the Commonwealth: Botswana, Cameroon, Eswatini, Gabon, The Gambia, Ghana, Kenya, Lesotho, Malawi, Mauritius, Namibia, Nigeria, Rwanda, Seychelles, Sierra Leone, South Africa, Tanzania, Togo, Uganda and Zambia.

A wide range of people drawn from international, civil society, non-governmental, intergovernmental and private sector organisations – including Transparency International, the World Bank and the United Nations Office on Drugs and Crime (UNODC) – also participated.



The Attorney-General and Minister for Justice with the delegates at the conference

A cross-section of participants



From left to right: The Attorney-General and Minister for Justice, Hon. Godfred Yeboah Dame; the Executive Director EOCO COP, Maame Yaa Tiwaa Addo-Danquah; Head, Public Sector Governance, Commonwealth Secretariat, UK, Dr Roger Koranteng; and the Deputy Attorney-General and Minister for Justice Hon. Alfred Tuah-Yeboah

Summary of the Proceedings

Day 1: Monday 6 May 2024

Opening ceremony

Master of Ceremonies – Mr Winston Amoah, JOY FM

Welcome remarks

COP Maame Yaa Tiwaa Addo-Danquah, The Executive Director, EOCO

The host of the conference, Commissioner of Police (COP) Maame Yaa Tiwaa Addo-Danquah, in her welcome address, acknowledged that Ghana was initially set to host the conference in 2026, but due to unforeseen circumstances, the responsibility was shifted to Ghana to host in 2024. She expressed her gratitude to the Ghanaian government for the support and funding, enabling the conference to take place two years earlier than originally scheduled. She also acknowledged Dr Roger Koranteng, the Head of Public Sector Governance at the Commonwealth Secretariat, for his leadership in anti-corruption efforts and his significant role in creating the Associations of Anti-Corruption Agencies across Commonwealth regions.

She mentioned in the address that the conference serves as a critical moment to address corruption, a challenge undermining societies, public institutions and economic development. Participants were encouraged to engage in dialogue, share best practices and develop innovative strategies to combat corruption. The conference host again emphasised the importance of integrity, accountability and justice in restoring public trust and creating a brighter future for Commonwealth Africa. She said the goal is to foster collaboration and strengthen efforts towards a corruption-free society.



COP Maame Yaa Tiwaa Addo-Danquah giving her opening remarks

Conference overview, objectives and expected outcomes

A message from the Rt Hon. Patricia Scotland KC, Secretary-General of the Commonwealth

The Rt Hon. Patricia Scotland KC addressed the Commonwealth's anti-corruption conference virtually, emphasising the critical need to combat corruption, which costs more than US\$3.5 trillion globally each year. She highlighted that Africa alone loses more than US\$50 billion annually to illicit financial flows – exceeding the total overseas aid received by the continent over the past 50 years. Corruption, she stressed, undermines social and economic progress, obstructing poverty reduction and the achievement of the Sustainable Development Goals (SDGs).

She underscored the importance of transparency and accountability in strengthening institutions and fostering public trust. The Commonwealth Secretariat remains committed to this fight, having supported progress through the Association of Corruption Agencies in Commonwealth Africa since 2013. Key initiatives include the Commonwealth Anti-Corruption Centre in Botswana, the introduction of anti-corruption benchmarks, and partnerships with technology leaders like Intel to develop automated warning systems that detect corruption risks, saving billions in public funds.

The Secretary-General concluded by urging continued collaboration, knowledge sharing and innovation to drive meaningful change. She expressed confidence in the collective ability to overcome corruption and looked forward to future in-person engagements.



Rt Hon. Patricia Scotland KC, Secretary-General of the Commonwealth
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Remarks by Professor Luis Franceschi, Assistant Secretary-General, Commonwealth Secretariat

Luis Franceschi, representing the Commonwealth Secretary-General, addressed the pressing issue of corruption, emphasising its deep impact on governance, transparency and economic stability. He shared his diverse background and personal connection to nations that have struggled with corruption, highlighting the global nature of the challenge.

He noted that governance faces increasing pressure for both accountability and efficiency, with social media accelerating public demands for swift action. While transparency is essential, excessive bureaucracy can create opportunities for corruption. Modern complexities, including cryptocurrencies and offshore accounts, further complicate anti-corruption efforts.

Professor Franceschi highlighted corruption's staggering global cost of US\$3.6 trillion annually, with Africa losing US\$20–US\$40 billion each year. Despite these challenges, he recognised the progress made by African nations, stressing that being 'less corrupt' is not enough. The Commonwealth, with its 56 member countries, offers a unique platform for collaboration, knowledge sharing and capacity building to combat corruption.

He underscored the Commonwealth's three-pronged approach – research, capacity building and networking – helping member countries develop anti-corruption benchmarks and strengthen governance. While success is not guaranteed, failure is certain if efforts stop. He urged continued collaboration to build a future of transparency, accountability, and prosperity for Africa and the Commonwealth.



Professor Luis Franceschi, Assistant Secretary-General

Dr Roger Koranteng, Head, Public Sector Governance, Commonwealth Secretariat

Dr Roger Koranteng, speaking to the conference, traced his journey with the Commonwealth Secretariat, which began over a decade ago when he was appointed as an adviser on governance. His role was new and undefined, giving him the freedom to chart his own course. Recognising the lack of a pan-Commonwealth network for anti-corruption agencies (ACAs), Dr Koranteng focused on building regional associations to strengthen anti-corruption efforts across Commonwealth nations, beginning with Africa.

In 2011, after hosting a conference in Botswana, the Association of Anti-Corruption Agencies ('the Association') in Commonwealth Africa was established. This initiative aimed to foster the exchange of ideas, share best practices and build capacity within ACAs. The conference became an annual event, rotating among member countries, and led to the creation of the Commonwealth Africa Anti-Corruption Centre (CAACC) in Botswana in 2013. The centre has become a key resource for training ACA staff, strengthening their capacity to combat corruption. Dr Koranteng's work expanded beyond Africa, with similar models established in the Commonwealth Caribbean, particularly in Grenada, and he has

delivered more than 200 executive development seminars globally. His efforts have led to the institutionalisation of anti-corruption training and support across the Commonwealth.

The Commonwealth Secretariat has hosted regional conferences in various African nations over the last 13 years, with the conferences providing a platform for ACAs to share experiences, learn from one another and collaborate on combating corruption. The conference in Accra, Ghana, in 2024 marked a return to the country a decade after it last hosted the event, reflecting the association's growth and success.

Dr Koranteng emphasised that the conference's main objective was to bring together ACAs, international organisations, and partners to exchange lessons and strategies for tackling corruption. The programme included an opening ceremony, technical sessions, an Annual General Meeting (AGM), and sightseeing. He expressed deep gratitude to the Ghanaian Government, the Commonwealth Secretariat and the conference organising committee for their support in making the event possible.

Dr Koranteng also thanked key individuals, including the President of Ghana, for their support, and acknowledged the hard work of COP Maame Tiwaa Addo-Danquah and the local organising committee. He concluded by expressing hope for the continued growth of the Association and its efforts to fight corruption, both in Africa and globally.



Dr Roger Koranteng, Head, Public Sector Governance, Commonwealth Secretariat

Remarks by Keith McMahon, British Deputy High Commissioner

Keith McMahon emphasised the global challenge of corruption and the necessity of collective action to address it. He highlighted the severe impacts of corruption on governance, development, security and the environment, stressing that no country, including the UK, is immune.

He detailed the UK's commitment to combating corruption through initiatives such as the Framework for Transparent and Accountable Asset Returns, two Economic Crime Acts, and the International Anti-Corruption Coordination Centre (IACC), which has recovered substantial stolen assets. He urged agencies to collaborate with the IACC

and praised Ghana's anti-corruption institutions for hosting the conference and their progress, supported by UK-led initiatives like the £4 million Serious and Organised Crime in Ghana (SOC-G) Project and capacity-building programmes.

Keith McMahon concluded by stressing the importance of persistence and collaboration in the fight against corruption, stating that while success cannot be guaranteed, giving up is not an option.



Keith McMahon, British Deputy High Commissioner

Remarks by the Hon. Godfred Yeboah Dame, Attorney-General and Minister of Justice, Ghana

The Hon. Godfred Yeboah Dame opened his address by extending heartfelt congratulations to the Executive Director of Ghana's Economic and Organised Crime Office (EOCO) for the excellent preparations for the conference. EOCO's mandate to monitor, prevent, investigate, prosecute and recover proceeds from economic and organised crime positions it as a critical player in Ghana's anti-corruption framework.

He warmly welcomed delegates to Accra, Ghana's capital, renowned for its democratic principles, good governance and vibrant cultural life. Hon. Dame highlighted Accra's socio-cultural allure, encouraging attendees to explore its attractions, and assured them of the renowned hospitality of the Ghanaian people.

The speech emphasised the conference's theme, 'Strengthening institutions in promoting transparency: a means of fighting corruption in Commonwealth Africa', underscoring the importance of transparency as the foundation of integrity and a powerful tool against corruption. He detailed Ghana's commitment to this cause, noting critical legislative and institutional reforms. Key achievements include the

Right to Information Act (2019), which enhances public accountability, and the recent amendment to the Whistle-Blower Act (2023), introducing financial rewards for whistle-blowers to incentivise reporting.

The Attorney-General lauded the government's bold initiatives, including the establishment of the Office of the Special Prosecutor, an independent body tasked with investigating and prosecuting corruption-related offences. He also highlighted other legislative measures aimed at deterrence and transparency, such as the Anti-Money Laundering Act (2020) and amendments to the Contracts Act to prevent financial losses to the state through unfair contracts.

He underscored the transformative impact of digitalisation in combating corruption, citing some innovations, including the Ghana.Gov platform (<https://www.ghana.gov.gh/>), a digitised land title registry and paperless systems in public institutions. These efforts have significantly enhanced transparency, reduced inefficiencies and curbed opportunities for corrupt practices in critical sectors.

The Attorney-General also stressed the importance of integrity in investigative processes. He called for honesty in disclosing outcomes of corruption allegations, even when claims against government officials prove unfounded. This transparency, he argued, fosters public trust and confidence in governance.

He emphasised the need for international co-operation in tackling economic crimes, pointing out that corruption often exploits cross-border weaknesses. He advocated for robust partnerships between nations, criminal justice institutions and private sectors to combat these threats effectively.



The Attorney-General and Minister for Justice Hon. Godfred Yeboah Dame delivering his address.

Concluding, the Attorney-General reaffirmed Ghana's commitment to fairness, efficiency and integrity in the justice system as essential to holding offenders accountable, particularly in high-profile cases. He wished the participants a fruitful and insightful conference, expressing hope that the discussions would strengthen collective efforts against corruption across Commonwealth Africa.

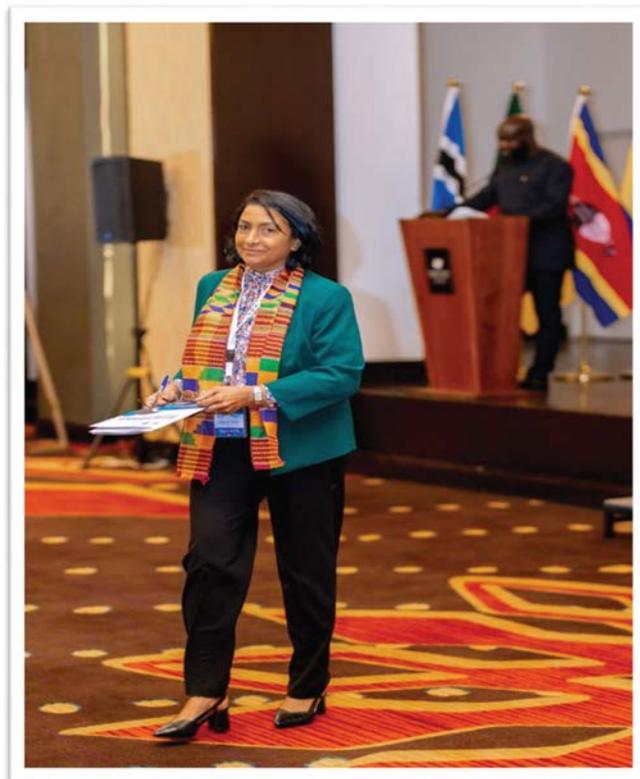
Vote of thanks

Ms May De Silva, Chairperson, Association of Anti-Corruption Agencies in Commonwealth Africa and Commissioner, Seychelles Anti-Corruption Commission

Commissioner De Silva of Seychelles expressed her appreciation to distinguished guests and reflected on the Seychelles' connection to Ghana, referencing a wise Ghanaian professor who inspired them. She recounted the historical ties between Seychelles and Ghana, highlighting the exile of King Prempeh I of Ashanti to Seychelles by the British in 1900 and his 24-year stay.

She announced the handover of the Commonwealth Africa Anti-Corruption Association chairmanship to Maame Yaa Tiwaa Addo-Danquah of Ghana's Economic and Organised Crime Office, emphasising the familial connections between Seychelles and Ghana. She also paid tribute to the late Greta Fenner, a renowned anti-corruption champion, for her contributions to the global anti-corruption community.

Commissioner De Silva concluded by thanking the Ghanaian organisers and partners for hosting the conference and wishing everyone a successful event filled with valuable discussions and camaraderie.



Ms May De Silva, Commissioner, Anti-Corruption Commission, Seychelles

Conference and Country Presentations

Weathering practical pitfalls in investigation and prosecution of corruption cases

Her Ladyship Afia Serwaa Asare-Botwe, Justice of the Court of Appeal, Ghana

Her Ladyship Afia Serwaa Asare-Botwe defined corruption as not only the diversion of public funds for personal gain but also recklessness with state resources, leading to financial loss, including conspiracy and abetment.

The key points from this presentation can be broken down as follows.

1. **Types of corruption**

- **Direct fraud.** The direct diversion of public funds for private benefit.
- **Indirect fraud.** Financial loss caused by negligence or recklessness.

2. **Case examples**

- *The Republic v Philip Assibit and Abuga Pele:* This case highlighted direct misuse of funds.
- *The Republic v Sedina Christine Tamakloe Attionu and Daniel Axim:* This case showcased other fraudulent activities.

3. **Pitfalls in investigations**

- Public officials must prioritise adherence to both substantive and procedural laws.
- Investigative agencies should ensure procedural correctness, respect jurisdictional mandates, and align with international and domestic legal frameworks.
- Weak evidence and procedural errors often undermine cases.

4. **Additional concerns**

- Recruitment for public office should emphasise ethics and integrity alongside qualifications.
- Law enforcement and anti-corruption officers need training in legal procedures and ethical practices.
- Improved conditions of service for anti-corruption agencies are crucial to reduce corruption temptations and retain skilled personnel.

Her Ladyship concluded by emphasising that proper procedures, jurisdictional respect and ethical governance are critical to the success of corruption investigations and prosecutions.

Questions and answers

Abdulai Bashiru Dapilah (EOCO) questioned why investigators often fail to gather sufficient evidence, pointing out that corruption-related cases require experts to dig deep and uncover hidden aspects and offences demand rigorous proof from law enforcement agencies. He emphasised that courts should understand the complexities faced by law enforcement in assembling cases.



Justice Afia Serwah Asare-Botwe, Justice of the Court of Appeal

The response from the speaker acknowledged that there is no point in proceeding to court if there is insufficient evidence and institutions must be allowed to operate effectively. However, she said there are no time limits on criminal trials, allowing ample time to gather solid evidence. Investigators must prepare thoroughly for cases.



Abdulai Bashiru, DED Operations (EOCO), posed questions relating to the presentation by Her Ladyship Afia Serwaa Asare-Botwe (JA)

A representative from the Malawi International Sector on Asset Recovery asked how Ghana could weigh its provisions on the Office of the Special Prosecutor (OSP) in terms of asset recovery and the provisions within the OSP Act.

Her Ladyship noted that the OSP's lack of success was due to its short tenure. She highlighted that successful investigations often include financial probes. For example, in the John Obinna case, a detailed investigation revealed all relevant properties and funds, leading to their seizure without the need for a forfeiture trial.

Another question noted that one of the major problems in effective investigations and prosecutions in corruption cases is the issue of decision-making. What are the most effective ways to combat corruption?

Her Ladyship explained that combating corruption effectively involves creating and enforcing strong anti-corruption laws, ensuring government transparency, supporting independent media, and maintaining high ethical standards.

A representative from Zambia emphasised the importance of procedure and shared experiences from the country, noting that sometimes overwhelming evidence can overshadow procedural lapses.

Her Ladyship responded that this depends on the circumstances. A poorly drafted charge sheet can be overlooked if the evidence is clear, but procedural aspects are crucial. For instance, in Zambia, a frozen account order must be confirmed in court within 14 days to maintain judicial oversight. The response to legal questions often varies by situation.

Country presentation by Tanzania

Tech tools for combating corruption in the health sector in Tanzania

Prevention and Combating Corruption Bureau (PCCB)

Neema Mwakalyelye, Deputy Director-General, Prevention and Combating Bureau (PCCB), presented on behalf of Tanzania's leading anti-corruption agency, explaining that it is leveraging technology to combat corruption in the health sector. This initiative addresses vulnerabilities caused by the significant national budget allocation to health services, susceptibility to embezzlement and inefficiencies in paper-based systems.

The speaker summarised key initiatives and tools as follows.

1. **Digital systems implementation**

- E-government initiatives and management information systems (MIS), like GOT-HOMIS, AFYACARE and e-HMS, are employed to improve transparency in health service delivery.
- Collaboration with the UN Development Programme (UNDP) has led to implementing tech tools in 20 hospitals to enhance transparency and accountability.

2. **Technological tools**

- Digital forensics and analytics.
 - Tools include Audit Command Language (ACL) for data extraction, Exterro FTK Imager for forensic imaging and digital forensic write blockers.
 - Data protection is ensured through encryption, MD5 and SHA1 hash algorithms, and privacy-preserving measures for sensitive patient records.

3. **Scope and results**

- Data were collected from the Medical Stores Department, 11 district hospitals and 9 regional referral hospitals.
- Outcomes included early detection and mitigation of corruption risks, improved revenue collection via GePG and awareness campaigns.
- The exercise identified areas for improvement in medical fee collections, credential management and reconciliation processes.

She went on to highlight that challenges include:

- lack of standardisation and uniformity in systems;
- high implementation costs;
- inadequate network infrastructure; and
- reluctance on the part of health workers to share data.

Finally, recommendations from the PCCB were as follows.

- anti-corruption agencies (ACAs) must evaluate and enhance their technological readiness to address corruption effectively; and
- emphasis should be placed on using digital tools to gather and safeguard evidence, ensuring compliance with legal standards and improving investigative and prosecutorial outcomes.

Ms Mwakalyeye said that the PCCB's approach aims to enhance efficiency, transparency and accountability, ensuring better healthcare service delivery while reducing corruption risks.



Neema Mwakalyeye, Deputy Director-General, Prevention and Combating Bureau, Tanzania

Country presentation by Nigeria

Anti-corruption drive – changing the narrative

Olanipekun Olukoyede, Executive Chair, Economic and Financial Crimes Commission (EFCC)

Introduction

Olanipekun Olukoyede, Executive Chairman of the Economic and Financial Crimes Commission (EFCC – 'the Commission'), presented for Nigeria. He said that the EFCC stands as a vital force in Nigeria's battle against corruption and financial crimes. Established in 2002 and reinforced by the EFCC Establishment Act of 2004, it has tirelessly worked to protect the nation's resources and uphold financial accountability. On 12 October 2023, a new chapter began when President Bola Ahmed Tinubu appointed Ola Olukoyede as the Executive Chairman of the EFCC. This appointment, he went on, was not just a change in leadership but a call to action for all Nigerians to join in the fight for a transparent and prosperous nation. With renewed energy and purpose, the EFCC is set to tackle corruption head-on, ensuring a brighter future for everyone.

Preventive measures

The speaker summarised some preventive measures taken by EFCC to combat crime.

- **Anti-corruption clubs in schools.** The EFCC promotes the formation of anti-corruption clubs in schools to educate students about the significance of integrity and the harmful impact of corruption.
- **Faith-based approach.** Religious leaders are encouraged to integrate anti-corruption messages into their teachings and community efforts, aiming to foster ethical behaviour among their followers.
- **Fraud risk assessment and control.** The EFCC focuses on evaluating and addressing potential fraud risks by implementing effective controls to prevent and manage fraudulent activities.
- **Tackling dollar racketeering.** The EFCC addresses issues related to illegal activities involving currency manipulation and money laundering, with a particular emphasis on transactions involving foreign currencies like the dollar.

Mr Olukoyede went on to highlight that the EFCC is actively shaping the future of Nigeria by introducing innovative strategies to combat corruption and financial crimes. Recognising the importance of reaching the next generation, the EFCC has established anti-corruption clubs in more than 200 primary, secondary and tertiary institutions, as well as within the National Youth Service Corps, to instil integrity and accountability in children and youth during their formative years. Additionally, a faith-based approach has been launched, leveraging religious values to educate communities on the harm caused by corruption.

To address fraud and financial misconduct, the EFCC has implemented a fraud risk assessment and control model, ensuring early detection of fraudulent activities in contracts and procurement processes. Meanwhile, proactive measures against forex malpractices include freezing over 1,000 illegal forex trading accounts on peer-to-peer (P2P) platforms and cracking down on unauthorised cryptocurrency exchanges, which has helped stabilise the naira and avert a potential forex market crash. Furthermore, a dedicated task force has been established across 14 zonal commands to tackle dollar racketeering, targeting speculative forex trading and illicit

practices. This effort, the speaker went on, has not only improved forex stability but also prompted investigations into private institutions charging tuition in dollars to reduce pressure on the naira.

These measures, he said, reflect the EFCC's unwavering commitment to fostering a culture of transparency, safeguarding Nigeria's economy and inspiring every citizen to play their part in building a corruption-free nation.

Post-conviction reorientation

Mr Olukoyede explained that this initiative educates ex-convicts on the impact of their actions, helping them avoid future crimes and focus on developing their potential to become better members of society.

Technological initiatives

In highlighting technological initiatives by the EFCC, the presenter explained that the Eagle Eye app was developed to support whistle-blowing by enabling individuals to report corruption anonymously. This innovative tool has significantly assisted the EFCC in gathering substantial intelligence on corrupt individuals both within and outside Nigeria, improving transparency and accountability.

In addition, the EFCC created the Eagle Case Management System to automate processes in the fight against corruption. This in-house application is designed to track cases from their inception to conclusion, ensuring efficiency, accuracy and seamless case handling. It reflects the Commission's commitment to leveraging technology to strengthen its operations.

To enhance document management, the EFCC implemented a digital archival solution. This system provides an electronic document management and archiving system (EDMS), ensuring efficient storage, retrieval and preservation of critical documents, while reducing reliance on physical files.

Finally, the speaker explained how the establishment of a forensic laboratory has significantly bolstered the EFCC's investigative capabilities. The lab focuses on specialised areas such as digital forensics, forensic document examination, fingerprint and crime scene management, forensic audio, video, and image analysis, as well as forensic chemistry. This facility ensures that the Commission can conduct detailed, scientific investigations to support its anti-corruption efforts.



Olanipekun Olukoyede, Executive Chairman (EFCC)

Questions and answers

The first question asked what the national security adviser's role was in combating corruption.

The speaker responded that the national security adviser plays a critical co-ordinating role in the fight against corruption in Nigeria. By law, anti-corruption agencies collaborate with other security agencies, which are co-ordinated by the national security adviser to ensure a unified and effective approach.

A second question addressed post-conviction issues concerning youth involved in information technology (IT)-related offenses. The questioner said that this seemed to fall under the purview of the probation department rather than anti-corruption agencies, as these agencies typically do not handle post-conviction responsibilities. They asked if the presenter could clarify how the ACAs were involved, how swiftly they secured convictions, and if there were specific cases where they had worked with convicted youth?

Mr Olukoyede said the response addressed public and private sector corruption differences and accentuated that anti-corruption agencies in Nigeria, including the EFCC and Independent Corrupt Practices and Other Related Offences Commission (ICPC), tackled significant corruption cases proactively to prevent escalation. While some overlap exists between mandates, thorough investigations were conducted before taking action. Additionally, the agency collaborated with convicted youth by employing some ex-convicts to lead youth groups that assist in gathering and retrieving critical information from suspects, contributing to the overall fight against corruption.

A final question drew attention to a crucial point that some corrupt individuals were found in churches or mosques. However, these religious institutions were often seen as areas beyond regulation. The questioner noted that as members of these communities, it was challenging to regulate how churches operate, particularly concerning offerings (donations).

The speaker responded that this question pertained to a political issue, as regulating religious institutions like churches or mosques involves sensitive socio-political dynamics. While corruption within such communities is recognised, enforcing regulations in these settings remained a complex challenge.

Country presentation by Lesotho

Strengthening institutions and promoting transparency: a means of fighting corruption in Africa

Directorate on Corruption and Economic Offences (DCEO)

Lesotho's presentation was made by Sefako Seema and Litelu Ramokhorro from the Directorate on Corruption and Economic Offences (DCEO). They noted that the fight against corruption over the past two decades had been hindered by a lack of political will to empower relevant institutions. However, progress was being made through enhanced collaboration, legal reforms and preventive measures.

The DCEO summarised its current position as follows.

In terms of collaboration and legal actions there were:

- The Directorate on Corruption and Economic Offences (DCEO) had signed a memoranda of understanding (MOU) with key law enforcement and oversight institutions to strengthen co-operation.

- In the 2023/24 financial year, the DCEO had prosecuted 48 cases involving significant sums of money and assets, including making cross-border recoveries.

In terms of prevention initiatives, there had been a revival of anti-corruption structures such as systems integrity committees within government entities, district anti-corruption committees, youth anti-corruption structures, and student integrity associations.

The speakers outlined a way forward involving legal reforms and capacity building. For example, an Omnibus Bill had been proposed to elevate the DCEO to an Anti-Corruption Commission, enshrined in the Lesotho Constitution, to enhance its independence. There would also be a focus on equipping officers with advanced technical skills aligned with the agency's mandate.

The main challenges faced involve political instability. For instance, since 2012, coalition governments had caused uncertainty, undermining anti-corruption efforts. Institutions also suffer political and moral compromise, leading to loss of public confidence. What is more, instances of corruption within the DCEO itself highlight internal weaknesses.

The DCEO representatives concluded with recommendations to build resilient internal and external mechanisms to sustain institutions and prepare them for future challenges. They noted Lesotho's strategy emphasises institutional strengthening, transparency and collaboration as critical elements for combating corruption and restoring public trust.



Sefako Seema (DCEO) Lesotho



Litelu Ramokhoro (DCEO), Lesotho

Country presentation by Seychelles

A decade of multi-agency jurisdictional learning – pirates, kleptocrats and drug dealers in Seychelles

Anti-Corruption Commission

May de Silva of Seychelles Anti-Corruption Commission explained that the country had faced significant challenges related to piracy, drug trafficking and corruption. Yet

it had also made strides through multi-agency collaboration, legislative reforms and international co-operation.

Some key issues and responses faced by Seychelles were summarised as follows.

1. **Piracy**

- Major problems in terms of piracy peaked in 2009, with 200 attacks, 68 successful hijackings and US\$50 million in ransoms.
- **Responses**
 - Co-ordinated efforts were made, such as a combined task force, a maritime security patrol area, ending the country's catch-and-release policy, better evidence gathering, domestic prosecutions, and robust prison sentences.
 - Trials were conducted with assistance from UK barristers.

2. **Drugs**

- Seychelles faces a severe heroin addiction crisis, social disruption, increased crime and overcrowded prisons.
- **Responses**
 - High-level strategies have been put in place involving multi-agency co-ordination.
 - Initiatives include drug courts, community sentencing, disrupting supply chains and robust sentences for dealers.
 - Legislative changes, international co-operation (with, for example, the International Anti-Corruption Coordination Centre [IACCC], the UK and the US) and public engagement have bolstered efforts.

3. **Addressing challenges**

- Challenges have been addressed through legislative changes, arrests of key perpetrators, domestic co-ordination via memoranda of understanding (MoUs) and robust prosecutions.
- Seychelles also engages in international partnerships with the African Union (AU) task force, the International Centre for Asset Recovery (ICAR) and other global organisations.

The speaker went on to highlight domestic co-operation undertaken by Seychelles Anti-Corruption Commission, including collaborations with law enforcement agencies, prosecution offices, financial intelligence units (FIUs) and the use of digital forensic tools. International co-operation includes with the Commonwealth Anti-Corruption Heads Grouping, sharing resources and intelligence, legal reforms, and internships to enhance capacity.

From a Commonwealth perspective, leveraging British Common Law, resource sharing, and advance notifications for mutual legal assistance (MLA) requests strengthen the anti-corruption fight.

In conclusion, Commissioner May De Silva emphasised that co-operation and collaboration, both domestically and internationally, are the most effective tools in combating corruption, piracy and drug-related issues in Seychelles and across Commonwealth Africa.



May de Silva, Commissioner, Anti-Corruption Commission, Seychelles

Institutional empowerment: a path to independence, effectiveness, transparency and accountability

Samuel Bwana, Manager, Integrity Vice Presidency, World Bank Group

Samuel Bwana, in his presentation, told participants that empowerment is the process of granting power, rights and authority to institutions or individuals, enabling them to perform their duties more effectively and efficiently. It can take various forms, such as financial support, technical assistance, personnel, resources, training and collaborative efforts. Empowerment helps institutions become more competent, resilient and influential, and it strengthens their capacity to operate independently and efficiently in different environments.

Mr Bwana went on to explain how key elements of empowerment include:

- **Technical and managerial support.** These enhance leadership, promote collaboration and enable institutions to function independently.
- **Legal and regulatory frameworks.** These frameworks are critical for ensuring institutional independence and effectiveness. They include progressive legislation that guarantees security of tenure, clear mandates, immunity for leaders and safeguards against undue interference. However, political will is often required to drive this empowerment.
- **Political will.** Political will is essential for reform and institutional empowerment, enabling change and providing resources for institutions to thrive.
- **Institutional autonomy.** While absolute independence is difficult to achieve, institutions must strive for operational autonomy to gain public trust. This includes financial independence, self-managed budgets, and transparent processes for resource management and recruitment.

The speaker emphasised the importance of effectiveness, transparency and accountability:

- Institutions achieve effectiveness through consistent rule application, transparent decision-making and fair leadership appointments. Transparency in managing resources and internal controls allows institutions to serve their objectives better.
- Accountability is fostered through public reporting, performance reviews and by holding officials accountable for their actions. Transparency also ensures that institutions adhere to principles of rule of law and human rights and allows for public access to information.

In conclusion, Mr Bwana stated, while absolute institutional independence may not be attainable, operational autonomy and immunity from undue interference are essential for ensuring effectiveness, accountability and transparency. Empowered institutions are better equipped to fulfil their mandates with integrity and competence.



Samuel Bwana, Manager, Strategy and Operations, Integrity Vice Presidency, the World Bank Group

International asset recovery: challenges and solutions

Simon Marsh, Basel Institute of Governance, Nairobi, Kenya

This presentation focused on the global challenges of asset recovery. It also proposed solutions and innovative approaches to improving the process. Key issues and solutions are summarised as follows.

Challenges

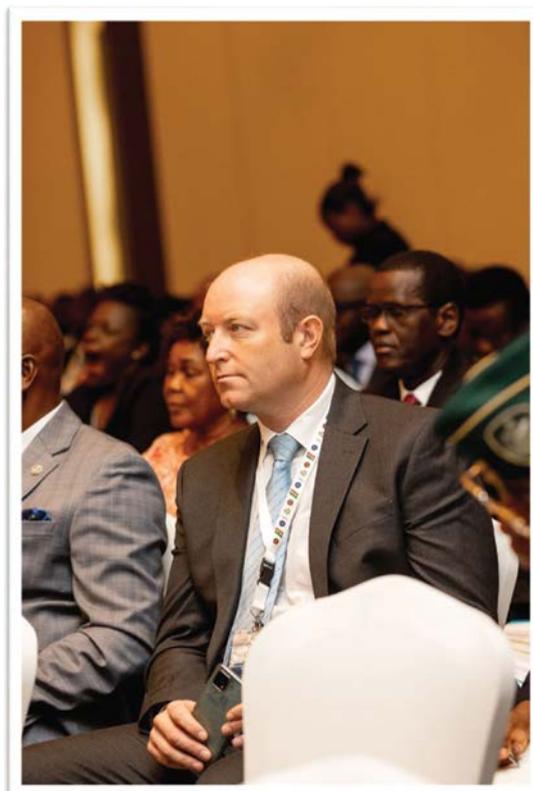
- **Beneficial ownership.** Complex corporate structures allow the concealment of asset ownership, creating significant obstacles to recovery, particularly in jurisdictions with weak enforcement mechanisms.
- **Mutual legal assistance.** Outdated legal frameworks cause delays in obtaining critical evidence, with complications like the need for certified translations and diplomatic transmissions.
- **International financial centres (IFCs).** Certain practices in IFCs impede evidence collection and asset recovery efforts.
- **Intelligence gathering.** Compared to other areas like counterterrorism, intelligence gathering for asset recovery is often underdeveloped, limiting the ability to track and recover assets.

- **Cryptocurrencies and virtual currencies.** These present unique challenges due to misconceptions, unregulated exchanges and difficulties in tracing crypto transactions.
- **Asset management.** Poor management of restrained assets often leads to depreciation, making recovery more difficult.

Solutions

- **Technology and international collaboration.** Using open-source intelligence (OSINT) tools, like facial recognition, data tracking and vessel monitoring, can aid investigations. Strengthening international co-operation through networks like Interpol, the IACCC and the Egmont Group is crucial.
- **Blockchain transparency.** Training investigators to analyse crypto transactions effectively can address challenges related to virtual currencies.
- **Asset management practices.** To mitigate value loss, early asset disposal and interest-bearing accounts are recommended.
- **Training and capacity building.** Basel eLearning courses on financial analysis, mutual legal assistance and intelligence gathering are essential to build expertise in asset recovery. The Basel AML (anti-money laundering) Index provides a ranking tool to assess anti-money laundering and countering the financing of terrorism (CFT) efforts.

In conclusion, Mr Marsh observed that the success of asset recovery relies on leveraging modern tools, international co-operation, continuous learning and adopting innovative approaches. Collaboration and capacity building are essential for overcoming the complexities of global asset recovery.



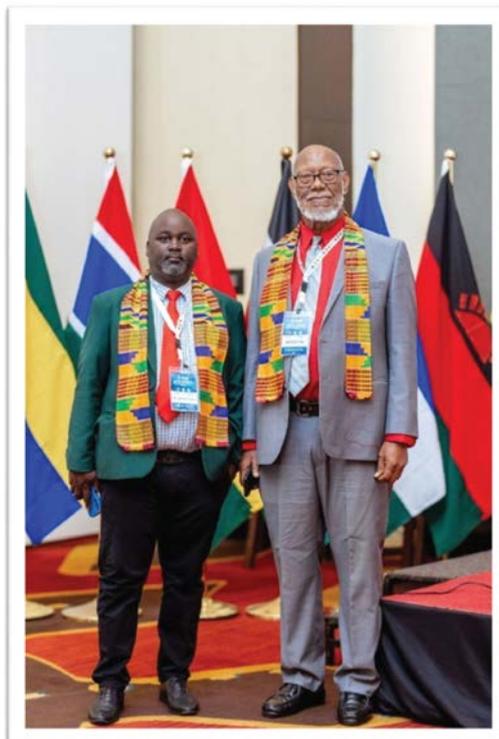
Simon Marsh, Basel Institute of Governance, Nairobi, Kenya

Day 2: Tuesday 7 May 2024

Lessons and challenges from the Commonwealth Caribbean in the fight against corruption: recommendations for strengthening oversight bodies Julian Johnson, Former Chairman, Integrity Commission, Dominica

In his presentation, Julian Johnson explored the fact that the Commonwealth Caribbean faces persistent corruption challenges, exacerbated by small state dynamics, such as close-knit relationships, political clientelism and economic dependency on government structures. While the region's governance is rooted in Westminster-style constitutions that emphasise accountability and the rule of law, implementation is hindered by institutional weaknesses, political interference and public mistrust. Anti-corruption frameworks include modern laws inspired by international conventions, but their effectiveness is limited by inadequate enforcement, resource constraints, and a lack of political will. Issues like undeclared assets, electoral corruption, and transnational money laundering, meanwhile, further complicate the fight against corruption.

The speaker further explained that to address these challenges, experts recommend strengthening the autonomy of oversight bodies, enacting political finance regulations, and fostering public accountability through improved legislative and institutional frameworks. Enhancing transparency in public finances, prioritising education on integrity, and ensuring the independence of commissions and electoral bodies are all key strategies in this respect. He concluded that, with robust reforms, consistent oversight and strong political commitment, the Commonwealth Caribbean can mitigate corruption and promote sustainable development.



Julian Johnson (on the right)

Questions and answers

The first question stated that Mr Johnson spoke about the appointment of two people by the opposition and two others by the Prime Minister. They asked if there was a 'middle ground' and how was the appointment by the opposition carried out. Did they nominate someone for the President to approve?

Mr Johnson responded that the Integrity Commission operate using a '2-2-1' system, whereby the President appoints the chairperson.

Dr Koranteng observed that he found the policy of involving the opposition in the appointment of boards to ensure that the interests of both parties are taken into consideration to be a positive one. This is better instead of a 'winner takes all' system, which causes political tension.

Global Operational Network of Anti-Corruption Law Enforcement Authorities – the GlobE Network

Kodjo Attisso, Corruption and Economic Crime Branch, UN Office on Drugs and Crime (UNODC)

Mr Attisso presented on the GlobE Network ('the Network'), noting that it facilitates international co-operation against corruption through communication, peer learning and collaboration among anti-corruption authorities. Its structure includes a steering committee for guidance and a plenary as the governing body. He went on to highlight that key initiatives like the Directory of Authorities, regional collaborations in the Western Balkans and Central Asia, and plenary meetings in cities such as Riyadh and Vienna, enhance connections and trust among practitioners.

The Network supports capacity building through training, a mentorship programme for women professionals and tools like the Digital Directory of Open-Source Registries. Collaborative efforts include bilateral and multilateral meetings, partnerships such as the Global Forum on Asset Recovery, and knowledge-sharing sessions. The speaker concluded by noting that upcoming events included a plenary meeting in Beijing, emphasising the Network's commitment to global anti-corruption efforts.



Kodjo Attisso, GlobE Network

Questions and answers

The first question concerned an observation that governments could get help from the GlobE Network. The questioner wanted to ask how a government could join GlobE Network and how the Network could help to prevent corruption.

Further questions asked if the GlobE Network could share on its successes and specific statistics such as those on asset recovery.

Participants also asked if the speaker could share on challenges the Network was facing and, in particular, if GlobE could assist on MLA issues – a major challenge for corruption agencies.

In his response, Mr Attisso said that this newly established network welcomed sharing statistics about success. However, he said he referred to the ongoing support for Moldova in very complex international corruption cases. The investigation was still ongoing, and would involve the seizure and confiscation of assets. He hoped this case would be completed soon, so the Network could demonstrate how its support is effective in anti-corruption cases.

The speaker also said that he had shared statistics regarding bilateral co-operation, focusing on the grouping of contraband cases. Starting from then, when he said 'bilateral', it meant cases like this one – which would help advance similar cases. From 2020/21, the Network had raised the number of cases to 17. This showed how they were able to assess the impact and benefit of the Network. This was not only about providing support to countries in complex anti-corruption cases, but also about the difference made by states in national policy co-ordination.

He went on that if an anti-corruption agency was a member of the Network, it would notice first steps towards the support needed. Therefore, in 2020, the Network saw significant results. He said that he would ask everyone to be actively involved to see results.

In the total determination of the asset, you mentioned one of the operations facilitated regional assistance. We do not want it back, but also the secure communication platform and use of information with clear legal assistance. You can see the directory identify the national counterpart and then send information accordingly.

Mr Attisso went on to note that if agencies wanted to engage in co-operation with countries via traditional ways of communication, they should support cases and share information on the platform. This was why he advised a formal position, but some countries use focal points not known to the national authorities. The directorate also thanked you globally for how to use them to reach out to national counterparts.

He noted that the concern from Ghana was whether national authorities would support it. If there was a high-level support, it would derive from the establishment of the group following the United Nations General Assembly's special session. UNODC believes that when an agency requests membership, not just as an entity, but also with the support and commitment of its country, it will be part of the Network and will provide all necessary support within national authorities to achieve results.

He said that challenges could arise, but you might say that without the support of your national authorities, expectations are that you are part of the network to support global efforts against corruption and share operational information. High-level commitments and full operational support would help achieve results. UNODC will assess the Network's progress in the next five years to see how it provides training, and mentorship, and how it supports agile cases and general assistance.

He concluded that the Network aimed to work together, not just for individual states but also for all member states to achieve its goals.

Challenges facing heads of anti-corruption agencies

Rose Nunu Seretse, former Director-General, Directorate on Corruption and Economic Crime (DCEC), Botswana

Rose Nunu Seretse presented on the challenges facing heads of anti-corruption agencies. She noted that governments had introduced favourable conditions of service for heads, recognising the demanding nature of the role. However, despite these conditions, challenges persist that can lead to frustration and hinder performance. She said that these challenges, if not addressed properly, could undermine the effectiveness of the agencies in their fight against corruption.

The challenges

The speaker outlined the primary challenges facing heads. One of these challenges that agency heads may be over keen and sometimes, empowered by their positions, may seek personal vendettas. This can lead to their manipulation by political figures to target those with opposing views. Additionally, the lack of prosecutorial and administrative independence presents significant issues. In some jurisdictions, the Prosecutor General holds the sole power to decide whether a case proceeds to trial. If the Prosecutor General is unwilling to pursue a case, it can be incredibly frustrating for the investigating authorities, especially when they believe they have strong evidence.

She went on to say that lack of administrative independence also poses a challenge, particularly when it comes to staffing decisions. In many cases, the power to appoint or transfer staff lies with public service management, not with the agency head. This can lead to abrupt transfers of key personnel, which disrupts the agency's work and morale. This is especially the case when those staff members have been heavily invested in and trained.

Another challenge is the question of how the head of the anti-corruption agency should be appointed. Should this be done by the President, a parliamentary committee or a board of directors? In some jurisdictions, the tenure of the head of the agency is not adequately protected by law, which can lead to instability in leadership.

Ms Nunu Seretse continued to highlight how personal investigations affecting the agency head's family members is another sensitive issue. The conflict of interest can be difficult to manage, especially when immediate family members are implicated in corruption allegations.

A lack of political will is also a recurring issue. Political support for the anti-corruption agency must be genuine and not merely a rhetorical statement. The agency needs to be resourced adequately, free from political interference, and treated as distinct from other government departments.

She stated that there is also a lack of accountability within some agencies. Given the sensitive nature of the job, anti-corruption officers must exhibit the highest levels of integrity and discipline. Finally, the public's lack of confidence in these agencies remains a challenge, even though public officers must maintain high standards of conduct and be cautious of accepting gifts.

Recommendations

To address these challenges, Ms Nunu Seretse made several recommendations. First, the appointment of the head of the anti-corruption agency should be made by parliament, rather than by the President, to ensure better political backing and

stability. The tenure of the office should not only be defined but also protected to ensure independence and continuity in the fight against corruption.

She also said anti-corruption agencies should engage with the public regularly to build trust and promote transparency. They should be equipped with the necessary resources to effectively carry out their mandate, as this would make the fight against corruption more manageable. Additionally, agencies should establish internal investigative units and sign service-level agreements with prosecution divisions to streamline processes.

A continuous lifestyle audit and regular vetting of agency staff are essential to ensure that corruption does not infiltrate the agency itself. Finally, the speaker highlighted that leadership within the agencies must uphold integrity and demonstrate a commitment to ethical conduct, reinforcing their credibility in the fight against corruption.



Rose Nuno Seretse, former Director-General, Botswana Directorate on Corruption and Economic Crimes

Country presentation by Mauritius:

Stepping up the fight against financial crimes in Mauritius through the Financial Crimes Commission Act 2023

Financial Crimes Commission (FCC)

Navin Beekarry, Director-General, Independent Commission Against Corruption (ICAC) presented on behalf of the Financial Crimes Commission (FCC), Mauritius. He explained that Mauritius had implemented significant reforms to combat financial crimes under the Financial Crimes Commission (FCC) Act 2023. The Act established the FCC as the leading agency to detect, investigate and prosecute crimes, including corruption and money laundering, aligning the country with international standards like the Organisation for Economic Co-operation and Development Working Group on Bribery (OECD WGB) Anti-Bribery Convention. He said that the FCC has four divisions: investigation, asset recovery and management, education and prevention, and legal operations.

He noted several innovations, including a national co-ordination committee for managing complex cases and an operations review committee for oversight. Additionally, a public-private task force has been formed to foster co-operation between sectors, and mandatory guidelines were introduced for public bodies. The speaker highlighted that the Whistleblower Protection Act provides rewards and safeguards for informants and witnesses. However, he acknowledged challenges such as resource constraints, enforcement issues, and implementation delays as ongoing obstacles.



Mr L. Boodhoo, Acting Assistant Director, Education and Preventive Division, Independent Commission Against Corruption (ICAC) Mauritius

Country presentation by Namibia

Namibia's fight against corruption

Anti-Corruption Commission (ACC)

The presenter on behalf of Namibia explained that the Namibia Anti-Corruption Commission (ACC) uses tools like the E-Justice System and the GLoBE Network to enhance investigations and international co-operation. The ACC has investigated more than 350 cases, implemented the National Anti-Corruption Strategy and Action Plan (NACSAP 2021–2025) and conducts corruption risk assessments. It also engages the public through initiatives like an anti-corruption song competition and commemorates anti-corruption days.

The speaker went on to highlight that, despite challenges like limited budgets and poaching of staff, Namibia ranks 8th in Africa and 59th globally in the 2023 Transparency International Corruption Perceptions Index. She concluded the presentation stating that the ACC remains committed to reducing corruption's impact through national and international efforts.



Ms Ndapandula Seleste Kambonde and Ms Marina Matundum ACC, Namibia

Country presentation by Zambia

Whistle-blowing in Zambia

Anti-Corruption Commission (ACC)

Thom Trevor Shamakamba, Director General of Zambia's Anti-Corruption Commission (ACC), explained that the ACC was established under the Anti-Corruption Act No. 3 of 2012. He said it is tasked with investigating, prosecuting and preventing corruption in both the public and private sectors. One of its key innovations is the Online Anonymous Whistleblowing System (OAWS), launched in April 2024. This platform allows citizens and employees to report suspected corruption securely and anonymously. The system features anonymity, high security, user-friendliness, global reach and feedback support, encouraging continued participation. However, as the speaker noted, challenges like limited access in remote areas and potential misuse of the system remain.

Despite these challenges, he went on, Zambia's ACC has achieved significant successes, including 24 arrests and convictions related to corruption, and the forfeiture of assets worth over US\$3 million, including vehicles and properties. The ACC has also strengthened its investigative capacity through the development of an asset tracking system and the acquisition of digital forensics software, supported by training from the International Centre for Asset Recovery (ICAR). The Director General concluded that the ACC's commitment to innovation and collaboration underscores its efforts to effectively combat corruption in Zambia.



Thom Trevor Shamakamba, Director General, Anti-Corruption Commission, Zambia

Country presentation by Uganda

Engaging public officers to participate in the war on corruption in Uganda: Uganda's innovative approach in combating corruption

Inspector General of Government, Inspectorate of Government (IGG)

Hon. Beti Kamywa Turwomwe, Inspector General of Government for Uganda's Inspectorate of Government (IGG) stated that the IGG is dedicated to promoting good governance by tackling corruption. She went on to explain that the IGG's strategy focuses on enhancing corruption detection, prevention and elimination through engagement with both public officers and citizens. By directly involving citizens in reporting corruption, the IGG has created a participatory approach, while also raising awareness among public officers, particularly leaders, about their role in fighting corruption and the challenges they face.

The speaker highlighted how this approach has led to notable successes, including the recovery of millions of US dollars and the prosecution of senior officials. However, challenges remain, such as fear of victimisation, low salaries and informal directives. She concluded, explaining that the IGG also emphasises the importance of integrating anti-corruption measures into government development plans and budgets.

Country presentation by South Africa

Conducting lifestyle audits

Special Investigating Unit (SIU)

Leonard Lekgetho, Chief Operations Officer of South Africa's Special Investigating Unit (SIU), explained how the SIU combats corruption, malpractice and maladministration through forensic investigations and civil litigation. A key strategy, he observed, is the implementation of compulsory lifestyle audits for all national and provincial government departments. These audits examine public service employees' financial profiles, comparing their declared income with their assets to detect discrepancies and undeclared income sources. The process includes analysing bank accounts, property ownership and other financial records.



Hon. Beti Kamywa Turwomwe, Inspector General of Government, Inspectorate of Government, Uganda

He went on to highlight how the SIU's audits help identify weaknesses in internal controls, promote transparency and encourage ethical behaviour within public institutions. While the unit has faced challenges such as incomplete or inaccurate financial reporting, its audits have successfully identified financial irregularities and corruption risks, prompting corrective actions and further investigations.



Leonard Lekgetho, Chief Operations Officer, Special Investigation Unit, South Africa

Country presentation by Ghana

Institutional collaboration in combating corruption and economic crime

Economic and Organised Crime Office (EOCO)

A representative of Ghana's Economic and Organised Crime Office (EOCO) made the next presentation, explaining that the EOCO tackles economic and organised crimes like fraud, money laundering, tax evasion and human trafficking. The speaker highlighted how the EOCO emphasises collaboration with both local and international law enforcement agencies (LEAs) and civil society organisations (CSOs) to combat these crimes effectively. The office works closely with national security agencies, regulatory bodies like the Bank of Ghana, and service providers such as banks and telecom companies. EOCO also engages in joint investigations and information sharing with international agencies like the US Federal Bureau of Investigation (FBI) and the Royal Canadian Mounted Police (RCMP).

Through these partnerships, EOCO has successfully recovered assets and prosecuted criminals involved in transnational organised crime. However, the presenter noted that challenges remain in maintaining effective communication, leadership and consistency in roles among the various collaborating bodies, which can hinder the overall success of their efforts.



Mr Abdulai Bashiru Deputy Executive Director, EOCO

Office of the Special Prosecutor (OSP)

Samuel Appiah Darko of Ghana's Office of the Special Prosecutor (OSP) explained how the OSP investigates and prosecutes corruption, with notable cases like the

2023 investigation into former Minister Cecilia Dapaah. This marked the first time a sitting minister from the ruling party was investigated for corruption. The OSP also focuses on prevention, reaching more than 6 million Ghanaians through education initiatives like Youth Against Corruption (YAC).

The speaker went on to highlight that, despite successes, the OSP faces challenges, including limited funding, poor collaboration among agencies and gaps in the legal framework. The OSP advocates for stronger legal measures, such as a Corrupt Practices Act and Unexplained Wealth Orders, to enhance anti-corruption efforts.



Samuel Appiah Darko, Office of the Special Prosecutor

Country presentation by Ghana

Combatting corruption in Ghana – key anti-corruption interventions

Commission on Human Rights and Administrative Justice (CHRAJ)

The presentation by Deputy Commissioner of the Commission on Human Rights and Administrative Justice (CHRAJ), Mercy Larbi, explained how Ghana's National Anti-Corruption Action Plan (NACAP) combats corruption through education, prevention and enforcement. Key achievements include thousands of awareness-building programmes, legal reforms and safe reporting mechanisms. Key initiatives include the Key Accountability Institution (KAI) Forum, whistle-blower protection and the School Integrity Project.

The speaker noted that challenges include limited funding, reluctance to report corruption and lack of political will for key legislation. Among the recommendations were focusing on improving collaboration, enforcing compliance and prioritising anti-corruption laws. The presentation concluded by noting that NACAP II will build on lessons from the first phase to address emerging corruption trends and strengthen partnerships.

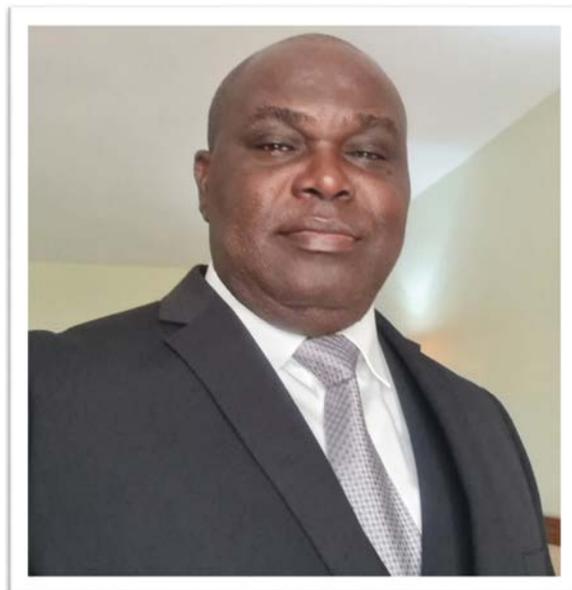


Deputy Commissioner, CHRAJ, Mercy Larbi

Transparency in fisheries in Africa

The Fisheries Transparency Initiative (FiTI)

Dr Godfred Ameyaw Asiedu of the Fisheries Transparency Initiative (FiTI) explained that FiTI is a global partnership that helps coastal countries improve transparency in fisheries management to ensure sustainability. Key areas of transparency include national laws, fisheries tenure, foreign fishing agreements, the state of resources, subsidies, labour standards and beneficial ownership. He noted that African countries involved include candidate countries (Cabo Verde, Madagascar, Mauritania, Seychelles), committed countries (Guinea, Senegal), and targeted countries (Cameroon, Ghana, Kenya, etc.).



Dr Godfred Ameyaw Asiedu, Regional Coordinator for Anglophone Africa, FiTI

Day 3: Wednesday 8 May 2024

The IACCC law enforcement capability – lessons learnt and guiding principles eight years later

Michael Petkov, Deputy Head, International Anti-Corruption Coordination Centre

Michael Petkov, Deputy Head of the International Anti-Corruption Coordination Centre (IACCC), presented insights on the IACCC's role in combating grand corruption – that is, high-level corruption involving bribery, embezzlement and illicit enrichment, which threatens political stability and economic development.

He explained that the IACCC does not conduct investigations but provides intelligence-led support to law enforcement agencies, aiding in evidence gathering, asset recovery and international co-ordination. It collaborates with global partners like INTERPOL, Egmont, the International Centre for Asset Recovery (ICAR) and the Stolen Asset Recovery (StAR) Initiative to simplify international co-operation and accelerate anti-corruption efforts.

Lessons learned and guiding principles

Drawing on eight years of experience, the speaker highlighted how the IACCC has identified key principles for effective international co-operation:

- Trust and communication: Informal police-to-police co-operation is often the most effective.
- Clear and proportional MLA requests: Legal assistance should be well-justified and focused.
- Financial analysis over suspect chasing: Tracking illicit assets is often more productive than directly pursuing offenders.
- Leveraging international organisations: Countries should utilise global anti-corruption networks for intelligence and support.
- Case studies and impact.
- That the IACCC's effectiveness is demonstrated through major international cases
 - Europe (2023–2024): Co-ordinated intelligence-sharing produced seven intelligence reports to support corruption investigations.
 - Africa (2020–present): Helped identify US\$250 million in stolen assets and continues to support recovery in multiple jurisdictions.
 - Asia (Malaysia, 2009–2014): Assisted in investigating a US\$4 billion corruption case involving 34 suspects, co-ordinating efforts across 4 jurisdictions.

In conclusion, Mr Petkov said the IACCC plays a crucial role in facilitating international collaboration, intelligence-sharing and asset recovery in corruption cases. Countries are encouraged to engage with the IACCC for support in their anti-corruption efforts.

For inquiries, Michael Petkov can be contacted at michael.petkov@nca.gov.uk.



Michael Petkov, Deputy Head, IACCC

Country presentation by Kenya

Overview of the fight against corruption in Kenya

Ethics and Anti-Corruption Commission (EACC)

Mr Abdi Mohammud, Deputy Chief Executive Officer of the Ethics and Anti-Corruption Commission (EACC), reported to the conference that Kenya, through the EACC, has made notable progress in combating corruption. The EACC focuses on law enforcement, asset recovery, ethical enforcement and public awareness initiatives. It conducts investigations, promotes integrity and enforces ethical standards, while advocating for legal reforms to enhance asset recovery mechanisms.

The speaker highlighted that from 2018 to 2023, the EACC recovered assets worth US\$180.4 million and prevented corruption-related losses of US\$277.1 million. It completed 655 investigations, secured 251 court rulings and strengthened anti-corruption measures in government entities.

He noted that emerging threats include money laundering, budget fraud, judicial delays and financial concealment via shell companies. To counter these, the EACC has introduced lifestyle audits, automated government processes and strengthened legal frameworks. Kenya's anti-corruption efforts continue to set a precedent for governance and accountability.

Country presentation by Eswatini

Fighting corruption in Eswatini

Eswatini Anti-Corruption Commission

Representatives from the Eswatini Anti-Corruption Commission (ACC) explained that it was established under the Prevention of Corruption Act, 2006, with a focus on education, prevention and investigation. They highlighted how the ACC has introduced initiatives such as forming a Tripartite Task Team with the Royal Eswatini



Mr Abdi Mohammud, MBS, Deputy Chief Executive Officer, Ethics and Anti-Corruption Commission (EACC)

Police (REPS) and the Director of Public Prosecution (DPP) to handle high-profile crimes, cross-designating roles between ACC and REPS for better collaboration and using 360-degree investigations to tackle case backlogs effectively.

Despite its progress, the ACC faces challenges, including limited capacity, reliance on outdated technology, delays in cross-border mutual legal assistance (MLA) and insufficient funding. However, its efforts have reduced case backlogs, increased public confidence and achieved successful investigations aided by whistle-blower information.

The speakers noted that key lessons emphasise the value of collaboration and resource pooling among agencies. Moving forward, the ACC recommends improving international co-operation, securing adequate funding, and enhancing capacity-building initiatives to strengthen its operations.



Lucky Majali Nkambule (Dolphin) and Maphevu Mkatshwa, Eswatini Anti-Corruption Commission, Eswatini

Strengthening institutions and promoting transparency: the crucial role of non-state actors in anti-corruption for sustainable development in Commonwealth Africa

Ghana Integrity Initiative (GII)

Mary Addah, Executive Secretary of the Ghana Integrity Initiative, presented on the next topic. She noted that corruption remains a significant obstacle to sustainable development in Commonwealth Africa, undermining governance and hindering progress toward achieving Sustainable Development Goals (SDGs). Despite governmental efforts, progress has been slow. She said that the presentation would highlight the critical role of non-state actors (NSAs) – including civil society organisations (CSOs), the media and the private sector – in combating corruption and promoting transparency. By working alongside governments and engaging in grassroots initiatives, NSAs can drive positive change, fostering a culture of accountability and helping achieve SDG 16: Peace, Justice and Strong Institutions.

Civil society in Commonwealth Africa has evolved from a force for anti-colonial activism to a powerful entity advocating for social justice, governance and sustainable development. Over the years, CSOs have adapted to changing political and social landscapes, using innovative approaches and forming strategic partnerships to address contemporary challenges such as corruption, inequality and climate change. Civil society organisations have become key players in promoting transparency, holding governments accountable and engaging citizens in the fight against corruption. They use technology, advocacy and policy influence to effect change and promote good governance.

Ms Addah went on to outline how civil society is defined by its voluntary nature, where individuals organise to pursue shared goals and advocate for social change. It comprises a wide range of organisations, including non-governmental organisations (NGOs), trade unions and religious groups, all of which operate with decentralised and flexible structures. This diversity and adaptability enable civil society to act as an important partner in democratic governance, fostering dialogue and participation in the policy-making process. Non-state actors, such as media outlets and the private sector, also play vital roles in exposing corruption, influencing policy and ensuring ethical practices within businesses.

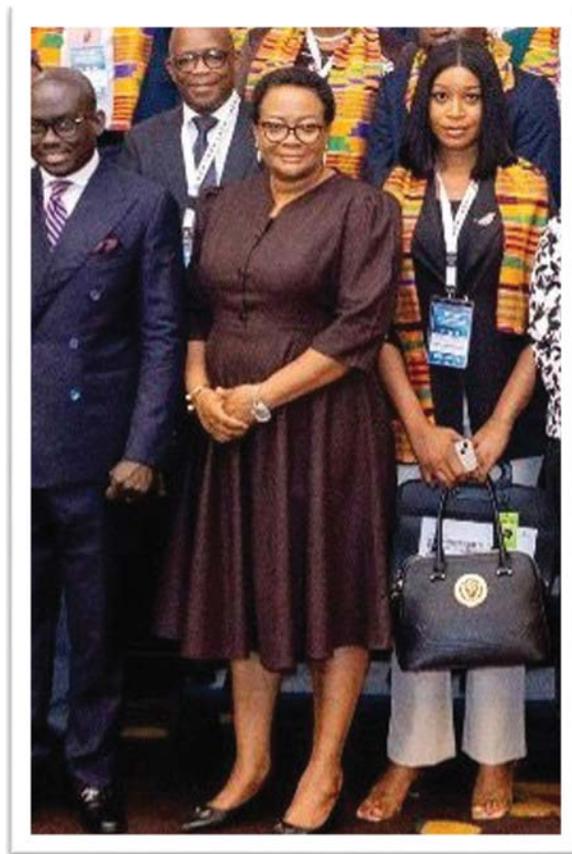
The presenter emphasised that collaboration between governments and NSAs is crucial for effective anti-corruption efforts. Governments alone cannot combat corruption; pooling resources and expertise with NSAs leads to more impactful outcomes. Additionally, leveraging technology and engaging in grassroots efforts strengthens transparency and accountability. The GII recommends enhancing international co-operation, investing in capacity-building initiatives, promoting inclusive governance, and encouraging the use of digital tools to increase transparency and reduce corruption.

The presenter turned to focus on civil society organisations (CSOs), explaining that they play a significant role in the fight against corruption, contributing to transparency, accountability and integrity across both the public and private sectors. Their efforts are diverse and proactive, with activities ranging from research and advocacy to monitoring and legal support. Research initiatives, such as the Corruption Perception Index (CPI) and Afro barometer, provide valuable insights into the prevalence and impact of corruption, which help inform evidence-based policy decisions. CSOs

also conduct awareness campaigns to mobilise public support for anti-corruption efforts and push for reforms through public dialogues, media campaigns and legal interventions.

Key examples of CSOs' advocacy were highlighted, including the support former Auditor General Daniel Yaw Domelovo, who faced pressure to be removed from office. Civil society organisations rallied behind him, leading to a Supreme Court ruling that set a precedent for future cases. Another notable case is the Agyapa Royalties deal in Ghana, where CSOs raised concerns about corruption risks, leading to parliamentary investigations and eventual suspension of the deal. Similarly, the Occupy Ghana Movement successfully pressured the government to address issues such as public service inefficiency and mismanagement of resources. These advocacy efforts have also resulted in the passage of important laws, including the Whistleblower Act, the Public Financial Management Act and the Right to Information Act, all of which enhance transparency and accountability.

In addition to advocacy, CSOs focus on monitoring and tracking government projects to ensure transparency and accountability. Organisations like GII, GACC and ISODEC track government spending and service delivery, while providing support to citizens through whistle-blower protection programmes and legal assistance. CSOs also offer capacity building and training, educating citizens on their rights and empowering them to monitor public services and infrastructure projects. They utilise mobile apps, social media and online platforms to promote citizen engagement, and they work to create safe spaces for whistle-blowers to report corruption.



Mary Addah (in the middle), Executive Secretary, Ghana Integrity Initiative (GII)

For sustained progress in combating corruption, the presentation by GII emphasised the importance of collaboration and networking between civil society, governments and international actors. Governments and international donors must prioritise funding for CSOs, enabling them to continue their advocacy and anti-corruption initiatives. Financial support for civil society strengthens democratic governance, fosters inclusive decision-making, and ensures that anti-corruption efforts are effective and sustainable.

In conclusion, Ms Addah said, civil society plays a critical role in promoting sustainable development in Commonwealth Africa by engaging citizens, advocating for reforms and building partnerships with governmental institutions. Future anti-corruption strategies must prioritise empowering civil society, leveraging its transformative potential, and ensuring that efforts lead to lasting change and development outcomes.

Strategies for overcoming corruption challenges in Africa

Dr Roger Koranteng, Head, Public Sector Governance, Commonwealth Secretariat

Dr Roger Koranteng of the Commonwealth Secretariat made the next presentation. He noted that the word 'corruption' derived from the Latin *rumpere* (to break), signifying a deviation from ethical principles, leading to misuse of resources and systemic inefficiencies. Historically, corruption was tolerated, but since the 1990s, it has been recognised as a major threat to economic growth, equality and political stability.

He defined the main types of corruption:

- Grand corruption: large-scale bribery involving high-ranking officials
- Systemic corruption: widespread bribery for licenses and permits
- Petty corruption: small but frequent bribes for preferential services
- Bureaucratic corruption: nepotism and dishonesty in job appointments
- Cronyism: favouritism towards family and close associates

Dr Koranteng went on to speak about the impacts of corruption: that it increases business costs, weakens institutions, discourages investment and exacerbates poverty. In Africa, it affects all sectors – public, private and informal – hindering social and economic progress. Poor work ethics and mismanagement further deter development.

He then summarised some strategies to combat corruption.

- Asset declaration: Public officials should declare assets before and after office to enhance transparency.
- Lifestyle audits: This involves monitoring officials' wealth to detect illicit gains.
- Beneficial ownership registers: This involves identifying real business owners to prevent financial crimes.
- Reversing the burden of proof: This is the shifting accountability to the accused to deter corruption.

In conclusion, Dr Koranteng observed that fighting corruption requires strong legal frameworks, law enforcement, ethical education and cultural shifts toward

integrity. Through transparency and accountability, Africa can build a foundation for sustainable development.



Dr Roger Koranteng, Head Public Sector Governance, Commonwealth Secretariat

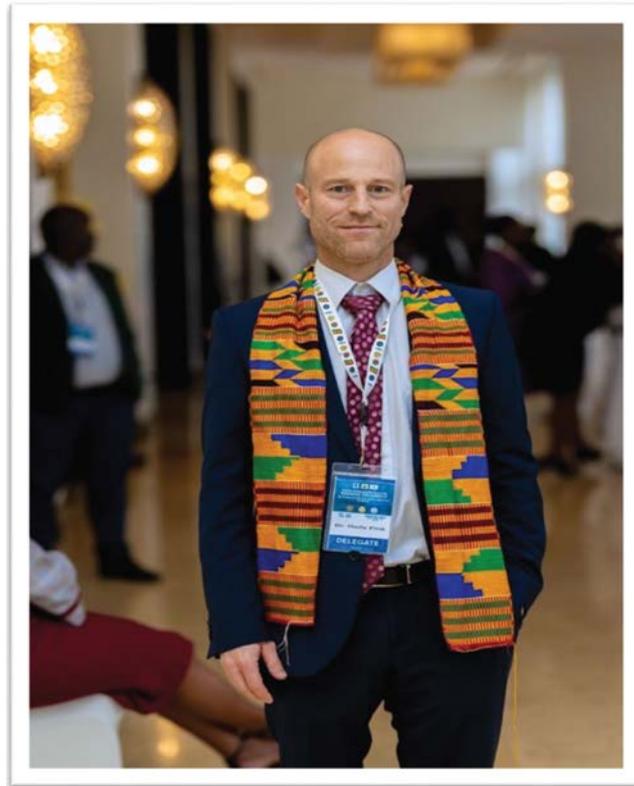
Engaging civil society in the fight against corruption

Dr Hady Fink, Adviser, Partnership for Transparency, Europe

Dr Hady Fink of the Partnership for Transparency addressed the conference on the topic of engaging civil society to fight corruption. Civil society (CS), he said, plays a small yet crucial role in the fight against corruption, offering significant contributions to anti-corruption agencies (ACAs), despite its potential being underutilised. Organisations like Partnership for Transparency (PTF) provide essential support, helping ACAs engage civil society effectively.

He went on to outline how CS contributes through research, policy analysis and outreach, promoting transparency and accountability. It also plays a vital role in third-party monitoring, which independently verifies projects and activities in procurement, implementation and budgeting. At the local level, CS ensures better service delivery, while nationally, it aids ACA programmes by providing valuable data and insights to inform policies and legal frameworks.

While CS's contributions are valuable, challenges such as reliability, independence and differing agendas exist. ACAs need to manage these risks to form successful partnerships with civil society organisations (CSOs). The speaker concluded by highlighting that PTF has partnered with more than 160 CSOs globally, offering capacity building, strategic advice and technical expertise to strengthen anti-corruption efforts and improve civil society engagement.



Dr Hady Fink, Adviser, Partnership for Transparency, Europe

Country presentation by Togo

Mandate and achievements

High Authority for Preventing and Fighting Corruption and Related Offences (HAPLUCIA)

Togo presented on the High Authority for Preventing and Fighting Corruption and Related Offences (HAPLUCIA), which was established by Law No. 2015-006. The President of HAPLUCIA, Kimelabalou Aba, explained that the authority is responsible for promoting and strengthening anti-corruption measures across both the public and private sectors. HAPLUCIA's duties include ensuring training and compliance in the public sector, promoting good governance, and co-operating with judicial authorities. It also has the authority to receive complaints, conduct preliminary investigations and refer cases for further investigation.

The speaker observed that HAPLUCIA has made notable achievements, such as training more than 1,600 elected and municipal officials on anti-corruption measures and raising awareness through public speaking competitions. The agency has established a co-ordination committee to unite stakeholders at the national level and works with international organisations like the Economic Community of West African States (ECOWAS) and UNODC.

He noted, however, that HAPLUCIA faces challenges, including the lack of an approved national anti-corruption strategy, limited resources for investigations and a lack of whistle-blower protections. To address these challenges, the presentation suggested the establishment of a High Authority for Transparency, Integrity in Public Life and the Fight Against Corruption, which would have investigative powers, promote ethical conduct and manage asset declarations from public officials.

Recommendations for improvement include updating and adopting the national strategy, providing financial resources and introducing anti-corruption education into curricula. The speaker concluded that HAPLUCIA's creation is as a significant step in the fight against corruption, with the need for co-operation at both the national and international levels.



Kimelabalou Abo, President of HAPLUCIA

Country presentation by Rwanda

Role of the Office of the Ombudsman

Office of the Ombudsman of Rwanda

Ms Rosemary Mbabazi, Rwanda High Commissioner to Ghana, spoke next on the role of the Office of the Ombudsman of Rwanda ('the Office'). She said that its initiatives in Rwanda also extend to the establishment of institutional frameworks that directly target corruption prevention. With a focus on strengthening the public and private sectors through anti-corruption committees, the office has been proactive in fostering a culture of transparency across various levels of governance. Additionally, the Office's efforts to institutionalise asset declarations and monitor them vigilantly contribute significantly to mitigating potential conflicts of interest and illicit enrichment within public offices. Through a combination of grassroots mobilisation and targeted interventions, such as anti-corruption campaigns in schools, the Office of the Ombudsman instils values of integrity and accountability in the younger generation, helping to build a foundation for future leaders committed to ethical practices.

The speaker went on to explain that the unique legal provision of making corruption imprescriptible (non-prescription of offences) is a significant step forward in ensuring that those involved in corrupt practices are not shielded from accountability due to time limitations. This has been complemented by the provision of exemptions from criminal liability for individuals who report corruption proactively, thereby incentivising the public to participate in uncovering malpractices without fear of retaliation. Despite facing challenges such as limited civil society engagement and underreporting of corruption, the Office of the Ombudsman remains dedicated to its mission of national reform.

Looking ahead, Ms Mbabazi said that the Office plans to deepen its educational outreach, ensuring that anti-corruption messages are tailored to resonate with every segment of the population. Further, it will continue to promote transparency by advocating for the adoption of national values that prioritise integrity in both the public and private spheres. By continually strengthening its preventive efforts, enhancing enforcement measures and ensuring broad community participation, the Office of the Ombudsman will play a pivotal role in solidifying Rwanda's reputation as a beacon of good governance and anti-corruption efforts in Africa.

Strengthening institutions and promoting transparency: a means of fighting corruption

African Development Bank, Ivory Coast

Mr Youssoupha Ndiaye of the African Development Bank (AfDB) stated that the AfDB is focused on strengthening institutions and promoting transparency to tackle corruption across Africa, as highlighted by the Corruption Perceptions Index (CPI) 2023. With 49 of 54 African countries scoring below 50 and a stagnant regional average of 33, the need for sustained anti-corruption efforts is critical. Corruption undermines economic growth, governance, public trust and social equality, while impeding progress on the Sustainable Development Goals (SDGs).

The speaker highlighted that the AfDB implements strategies to combat corruption, like the Strategy for Economic Governance in Africa (SEGA) 2021–2025, which focuses on institutional capacity building, regulatory frameworks, civil society engagement and asset recovery. Country-specific initiatives include supporting Ivory Coast's National Anti-Corruption Strategy, strengthening Mali's economic governance and training South Sudan's anti-corruption agency. Transparency remains central, with public disclosure of funding and project information, high ratings on the Global Aid Transparency Index, and publication of sanctions decisions.

In conclusion, Mr Ndiaye said that by aligning with country needs and collaborating with stakeholders, the AfDB reinforces governance and sustainable development, positioning itself as a key driver of anti-corruption efforts in Africa.

Country presentation by Malawi

Martha Chizuma, Director General, Anti-Corruption Bureau

The speaker presented the innovative work and Initiatives implemented by the ACB In 2023–2024. She said that the ACB continued to lead the fight against corruption in Malawi and in the financial year 2023–2024 there were various initiatives and innovations that the Bureau implemented under both corruption prevention and law enforcement mandates. The following are some of the initiatives that the ACB championed in the fight against corruption.



Youssoupha Ndiaye, Principal Integrity Officer, African Development Bank, Ivory Coast

The launch of Malawi Integrity Anthem. The Anti-Corruption Bureau, in its efforts to implement Malawi's National Anti-Corruption Strategy II, launched the first ever integrity anthem contextualized locally as **Umunthu Anthem**. The Anthem calls on all the citizens of Malawi to be patriotic, embrace integrity and in unison advance the fight against corruption in Malawi, leading to improved governance, service delivery and welfare of the citizens.

Development and Launch of the Anti-Corruption Sourcebook. In the year 2023, the ACB developed and launched a Sourcebook for primary schools titled "Teaching Values for a Corruption-free Malawi". The Sourcebook is designed to complement existing topics in the curriculum, thereby ensuring that themes of corruption and integrity are integrated into primary education curriculum.

Monitoring of Service Delivery including infrastructure Projects. One goal of the NACS II is to improve public service delivery both in terms of quality and accessibility. Towards the attainment of this goal, ACB partnered with some other government institutions to monitor service delivery. Of notable mention is the monitoring of major infrastructure projects like roads construction being undertaken by government. The Bureau jointly did the exercise with the National Construction Industry Council (NCIC).

Country presentation by Nigeria

Initiatives implemented by the ICPC in the fight against corruption in Nigeria

Independent Corrupt Practices and Other Related Offences Commission (ICPC)

Dr Musa Adamu Aliyu, Chairman of the Independent Corrupt Practices and Other Related Offences Commission (ICPC, 'the Commission'), presented next, highlighting that the Commission has implemented innovative strategies to combat corruption in Nigeria. Its Digital Transformation Initiative has modernised the Commission's operations by improving data integrity, transparency and accountability. This initiative addresses key challenges such as data accuracy, cybersecurity threats and citizen engagement, ensuring that technology is effectively leveraged to enhance anti-corruption efforts. To sustain its success, the ICPC is fostering multi-agency collaboration, conducting routine reforms and investing in digital skills development.

Another impactful initiative is the Constituency and Executive Projects Tracking Initiative (CEPTI), designed to ensure the efficient execution of publicly funded projects. By monitoring these projects, CEPTI has improved service delivery and strengthened collaboration between the ICPC and government agencies. Despite challenges like limited resources and supervisory tools, the initiative has delivered notable results. The speaker went on to explain how, moving forward, the ICPC plans to enhance CEPTI's capacity by recruiting additional personnel, establishing a dedicated secretariat and expanding operational resources.

The ICPC has also addressed social injustices through a Sexual Harassment and Abuse Response Team (SHART), which targets sexual harassment in academic institutions. This initiative has raised awareness and led to the prosecution of offenders, promoting safer learning environments. However, societal stigma and institutional resistance remain significant challenges. To address these, the ICPC is training judicial officers, establishing safe houses for survivors, and enhancing institutional responses. The presenter concluded that together, these initiatives demonstrate the ICPC's commitment to fostering accountability, integrity and social justice in Nigeria.

Country presentation by Cameroon

Innovative initiatives in the fight against corruption in Cameroon

National Anti-Corruption Commission (CONAC)

The presentation by Cameroon's National Anti-Corruption Commission (CONAC) was given by Reverend Dr Dieudonné Massi Gams. He observed that the country has made significant strides in combating corruption through initiatives spearheaded by CONAC under his leadership. Established in 2006, CONAC's mission includes prevention, education and enforcement to address corruption. Its Rapid Results Initiative (RRI) plays a key role, employing education, incentives and sanctions to address corruption hotspots within 100 days. Sector-specific campaigns target



Dr Musa Adamu Aliyu (SAN), Chairman of the ICPC – Nigeria

areas like education, forestry and cocoa, while Anti-Corruption Caravans mobilise communities to stand against corruption. CONAC also ensures transparency in public examinations through its Corruption-Free Competitive Entrance Examination (COSCO) programme and uses media platforms to educate and raise awareness among the public.

Dr Massi Gams went on to highlight how CONAC's Anti-Corruption Clinics have been instrumental in decentralising its services, bringing them closer to the population for real-time case handling and prosecution. These clinics have yielded tangible results, including hundreds of investigations, several arrests and the recovery of funds. Another impactful initiative is the Communication Platform with Anti-Corruption Unit Heads, which provides training, fosters collaboration and ensures quick responses to corruption cases. In 2023, more than 150 unit heads were trained on ethics, corruption risk assessment and management practices. The platform also leverages technology, such as WhatsApp, for efficient communication and reporting.

The speaker then noted that partnerships remain central to CONAC's anti-corruption strategy. Collaborations with ministries, community radio stations and artists promote grassroots engagement and awareness. Yes, despite notable successes, challenges persist, including limited funding, a static budget, insufficient staff and a lack of decentralised services. He concluded by making a number of recommendations to enhance effectiveness, including increasing financial and human resources and creating a judicial framework to address crimes like illicit enrichment. These initiatives and recommendations highlight Cameroon's commitment to strengthening its anti-corruption efforts and promoting integrity nationwide.



Reverend Dr Dieudonné Massi Gams, CONAC, Cameroon

Mineral supply chain due diligence for anti-corruption: responsible business conduct

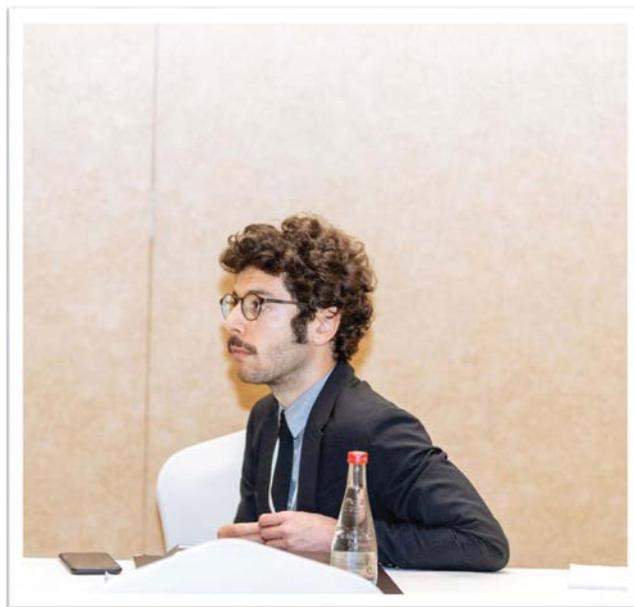
Organisation for Economic Co-operation and Development (OECD)

OECD Policy Analyst, Luca Maiotti, presented on the topic of mineral supply chain due diligence. He first explained how OECD Responsible Business Conduct instruments provide crucial guidelines for tackling corruption risks in mineral supply chains, particularly in extractive industries such as mining, oil and gas. These industries are notably prone to transnational bribery, representing one in five foreign bribery cases, according to the OECD's 2014 Foreign Bribery Report. In African countries, corruption in these sectors results in substantial economic losses, estimated at US\$50 to US\$150 billion annually. With the rising global demand for critical minerals needed to meet net-zero goals, meanwhile, the risks associated with corruption in mineral supply chains are intensifying. Areas with low governance, like the Democratic Republic of Congo, are particularly vulnerable, especially in sectors like cobalt and copper mining.

The speaker went on to highlight that the *OECD Due Diligence Guidance for Responsible Mineral Supply Chains* offers a comprehensive, five-step framework for companies to manage these risks. It applies globally, especially in conflict-affected or high-risk areas, urging businesses to establish robust management systems, assess and prioritise risks, collaborate with local stakeholders, conduct third-party audits,

and publicly report on due diligence practices. Upstream companies are tasked with ensuring traceability to the mine of origin, while downstream companies focus on managing risks by gathering information from upstream entities. Refiners, which are often critical points in the supply chain, are subject to audits to ensure adherence to anti-corruption measures.

Mr Maiotti said the OECD emphasises a progressive and holistic approach to mitigating corruption risks. Companies are encouraged to adopt stronger internal management systems, such as anti-corruption programmes and risk monitoring, and engage in capacity-building efforts with suppliers. This strategy extends beyond mere compliance to address broader issues, ensuring that anti-corruption efforts are both comprehensive and sustainable. He concluded that, through this approach, companies can not only comply with legal and reputational standards, but also contribute positively to environmental and social outcomes in high-risk mineral supply chains.



Luca Maiotti, Policy Analyst, Mineral Supply Chain

Day 4: Thursday 9 May 2024

Forging partnerships: blueprint for forensic investigations and asset recovery in Commonwealth Africa

Amaechi Nsofor, Partner, Head of African Insolvency and Asset Recovery, Grant Thornton, UK LLP

The first presentation of the day was given by Amaechi Nsofor from Grant Thornton on the topic of forensic investigations and asset recovery. The speaker first emphasised the importance of partnerships in addressing illicit financial flows and advancing forensic investigations across Africa. He then went on to present some key statistics. For example, Africa faces significant financial challenges, with illicit financial flows exceeding US\$60 billion annually, corruption-related losses surpassing US\$100 billion annually and an infrastructure funding gap of US\$120 billion each year.

Yet several obstacles hinder progress in tackling these issues. These he summarised as follows:

- **Political will.** There is limited commitment to prioritising anti-corruption measures.
- **International collaboration.** Co-operation across jurisdictions is weak.
- **Funding.** There are insufficient resources for thorough investigations.
- **Legal frameworks.** Laws and regulations in Commonwealth Africa tend to be outdated or inadequate.
- **Asset management.** Systems for asset recovering and preserving value are often inadequate.
- **Skillsets.** There is a lack of specialised expertise for complex investigations.

Mr Nsofor proposed several key strategies to overcome these barriers.

- **Public–private partnerships.** These would involve combining resources and expertise from both sectors.
- **Dual approaches.** This would mean employing both criminal and civil proceedings to address corruption.
- **Training.** Skills and capacity could be enhanced through targeted programmes.
- **Regime change protections.** These would ensure that anti-corruption efforts remain unaffected by political changes.
- **Transparent funding.** Sustainable and transparent financial models need to be established to support initiatives.

He then proposed a way forward to advance these efforts. First, investigations should start domestically, with international collaboration as needed. Systems must also foster trust, accountability and transparency. Finally, mechanisms should be created to adapt to political or regime changes without disrupting anti-corruption work.

In conclusion, the speaker highlighted that strategic partnerships and robust frameworks are essential for effective asset recovery and forensic investigations in Africa. These will then pave the way for sustainable development and accountability.



Aechi Nsofor, Partner, Head of Africa, Insolvency and Asset Recovery, Grant Thornton UK LLP

Country presentation by Sierra Leone Commissioner, Anti-Corruption Commission

The presentation on behalf of Sierra Leone was given by Francis Ben Kaifala of the country's Anti-Corruption Commission (ACC). He first noted that the fight against corruption in Sierra Leone has taken a bold and innovative turn with the introduction of a non-prosecution policy by the ACC. This ground-breaking approach is designed to not only hold corrupt individuals to account, but also to recover stolen assets efficiently and deter future misconduct. Under the Anti-Corruption (Amendment) Act No. 9 of 2019, the ACC Commissioner now has the authority to opt for alternatives to court proceedings, such as restitution agreements, asset forfeiture and barring individuals from public office for a minimum of three years. This means that justice is served swiftly, and stolen resources are returned to benefit the nation.

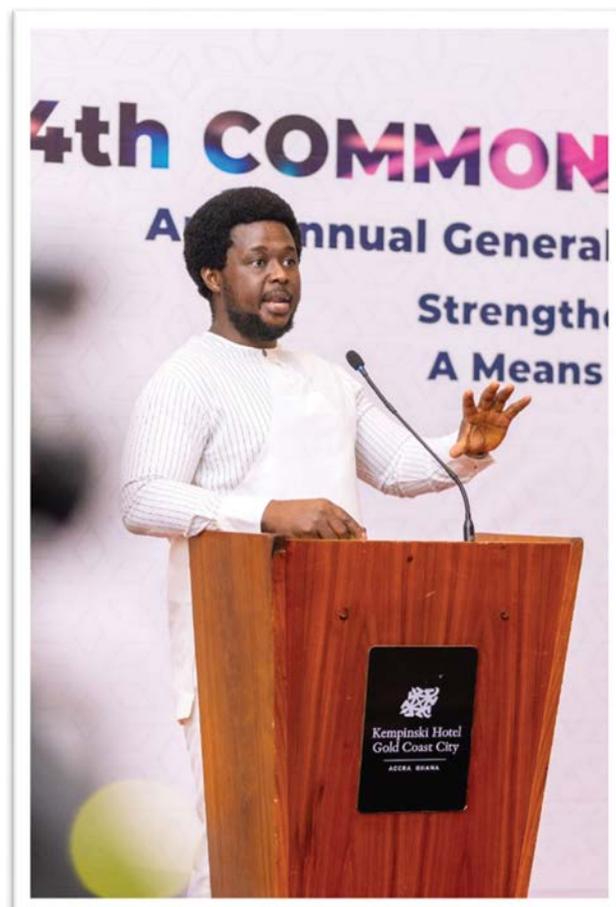
Mr Kaifala continued by asking participants to imagine a system where delays and resource constraints no longer hinder the fight against corruption. The ACC's policy ensures that prosecutors have the tools to choose the most effective course of action for each case. Factors like the severity of the crime, the suspect's willingness to make restitution and the need for deterrence are carefully weighed. Alternatives

such as civil penalties, co-operation agreements and deferred prosecution have become essential in holding offenders accountable while maintaining the integrity of the justice system.

He reported that the impact of this policy is already transforming Sierra Leone. More than US\$3.5 million has been recovered, representing more than just numbers – it is money returned to the people. Sierra Leone’s international reputation has also improved, with the country climbing from 130th in 2018 to 108th in 2023 on the Transparency International Index. For five consecutive years, Sierra Leone has outperformed the sub-Saharan average in the Millennium Challenge Corporation Scorecard, achieving over 70 per cent.

Yet, as the speaker wished to highlight, perhaps the most inspiring part of this story is the change in public perception. In 2023, 58 per cent of citizens expressed approval of the government’s anti-corruption efforts, a remarkable rise from just 19 per cent in 2015. Corruption, once seen as the country’s top challenge, is no longer viewed as the primary issue. Sierra Leone has even gained recognition for its exemplary management of COVID-19 funds, ranking third in Africa and first in West Africa.

In conclusion, Mr Kaifala, observed, this policy isn’t just a strategy; it’s a beacon of hope. It shows that by embracing innovative solutions, Sierra Leone is not only fighting corruption but also restoring trust and building a future where integrity prevails. As a citizen or observer, it is possible to take pride in the strides being made. The ACC’s work is proof that determined efforts can create real change, turning challenges into triumphs for a nation and its people.



Francis Ben Kaifala, Commissioner, Anti-Corruption Commission, Sierra Leone

Country presentation by Botswana

Key initiatives and projects undertaken by DCEC

Directorate on Corruption and Economic Crime (DCEC)

Botlhale Makgekgenene, Director General of the Directorate on Corruption and Economic Crime (DCEC), presented on behalf of Botswana. She said the country has upheld its vision of a corruption-free society since 1994, guided by ongoing initiatives, legislative reviews and collaborations. While its 2023 Corruption Perceptions Index (CPI) score of 59 places it among Africa's top performers alongside Seychelles and Cabo Verde, challenges such as justice system infiltration persist.

The speaker first outlined some of DCEC's key initiatives. Aligned with the DCEC Strategic Plan (2021–2026), partnerships with the Anti-Corruption Commission (ACC) of Eswatini and Bi-National Commissions (Zimbabwe, Namibia and Eswatini) foster capacity building, risk management and joint anti-corruption activities.

It has also engaged in several innovative projects such as the '**Corruption Free Squad #He Hogo**' roadshow in 2023, which engaged communities in Kgalagadi District through 'edutainment' and local partnerships. Sponsored by UNDP, it coincided with the 20th anniversary of the UN Convention Against Corruption (UNCAC), with similar efforts planned for 2024. Events such as African Anti-Corruption Day and the UN Anti-Corruption Day, meanwhile, included corporate social responsibility activities, integrity walks and stakeholder engagements to promote awareness.

The speaker continued by highlighting Ministerial Performance Reviews (MPRs) and legislative reforms. Revived in 2024, these reviews focus on human resource management, financial oversight and anti-corruption frameworks with ministries, departments and agencies, prepared for implementation in October each year. A draft amendment to the Corruption and Economic Crime Act (CECA), meanwhile, aims to expand corruption offenses and DCEC's mandate to include the private sector. The Whistleblowing Act of 2016 is under review to enhance whistleblower protections.

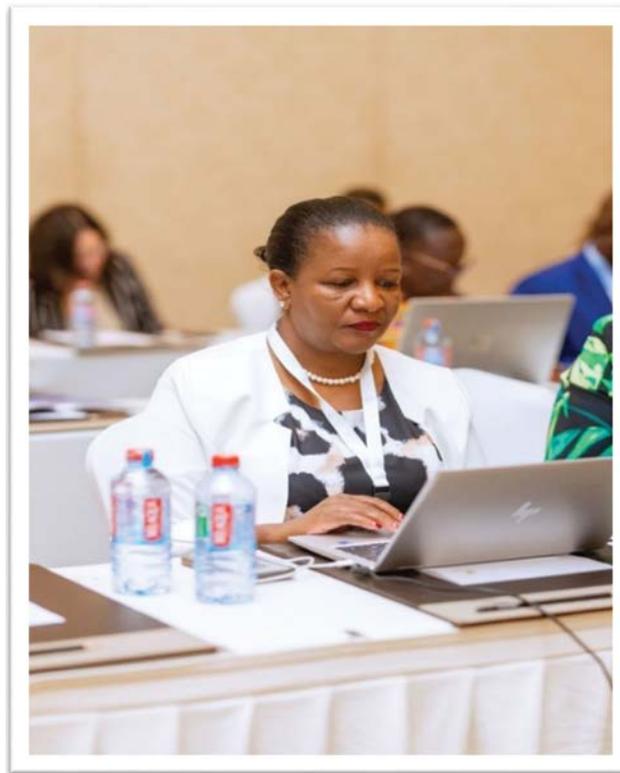
Ms Makgekgenene then reported on some notable cases, including:

- misconduct by the former CEO of the Botswana Housing Corporation (BHC) involving unauthorised sales of institutional property;
- corruption in the Glen Valley Wastewater Treatment Plant project, marked by inflated contracts and bribes; and
- senior officials implicated in procurement fraud and bribery.

She stated that corruption-prone areas mainly involve tendering and procurement processes, the construction industry, and land acquisitions and road transport licensing.

In terms of challenges, the speaker said Botswana faces delays in prosecutions, inadequate implementation of audit recommendations and resource constraints. Lessons include the need for strategic partnerships, stakeholder engagement and lifestyle audits to tackle unexplained wealth effectively.

Finally, she concluded that DCEC is committed to strengthening legislation, increasing resources, monitoring corruption trends, targeting corruption-prone sectors and enhancing collaboration with justice system actors. These efforts aim to uphold Botswana's vision of a corruption-free society.



Bothale Makgekgenene, Director General, Directorate on Corruption and Economic Crime, Botswana

Cryptocurrency and asset management

Aiden Larkin, Co-founder/CEO, Asset Reality, UK

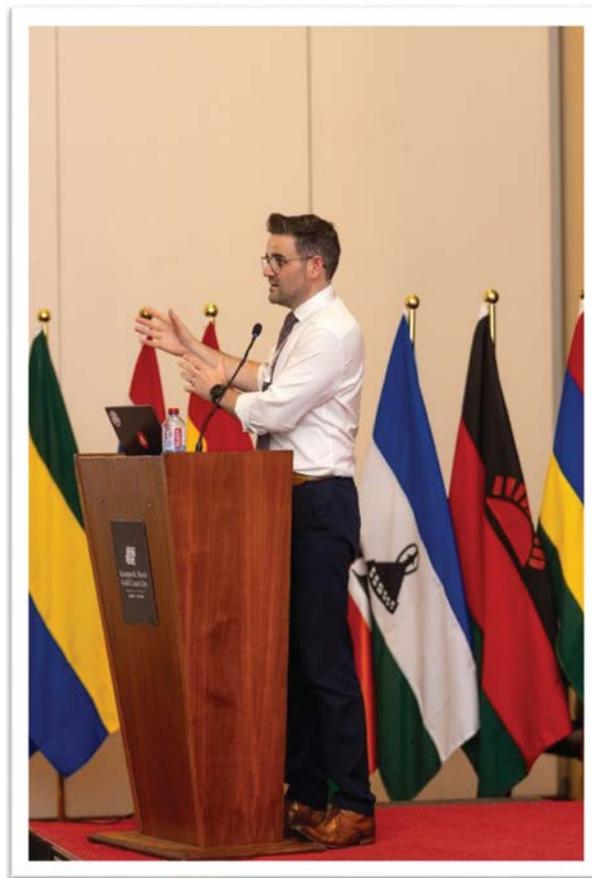
The next topic, presented by Aiden Larkin of Asset Reality, focused on cryptocurrency and asset management. He stated that the global fight against organised crime has brought the seizure and management of crypto assets into sharp focus. This critical topic proved to be a key discussion point at the conference. It underscored the growing importance of effective asset recovery systems for both digital and physical assets in combating the US\$2 trillion problem posed by organised crime.

The speaker observed that Asset Reality, a global leader in seized asset management, provides end-to-end services for seizing, managing and realising the value of confiscated assets. Unlike software-only solutions, the company's expertise lies in its practical experience of recovering billions of dollars in assets globally. The Financial Action Task Force (FATF) President, T Raja Kumar, emphasised the necessity of prioritising asset recovery within countries' crime prevention and justice strategies. However, the process is often hindered by challenges like inadequate infrastructure, insufficient expertise and limited financial resources.

Mr Larkin went on to note that asset management systems face significant obstacles, including auditability, effectiveness, corruption risks and high maintenance costs. For cryptocurrencies, these challenges are compounded by the complexities of blockchain technology and distributed ledger systems. Effective pre-seizure planning is critical to ensure assets are properly identified, secured and their value preserved throughout the process. Key considerations include blockchain analysis, custody management of cryptographic keys, and understanding the legal frameworks and technical environments for virtual asset service providers (VASPs).

The speaker highlighted how managing seized cryptocurrencies involves unique risks related to custody, compliance with anti-money laundering (AML) standards, and transparency. Liquidating these assets requires strict adherence to legislative frameworks, thorough due diligence and often the involvement of third-party experts. Public-private partnerships, such as those led by Asset Reality, enhance existing infrastructure and enable secure custody and efficient management of digital assets through flexible wallet systems and governance layers. Case studies and live demonstrations showcase the company's expertise, offering practical insights into real-world applications.

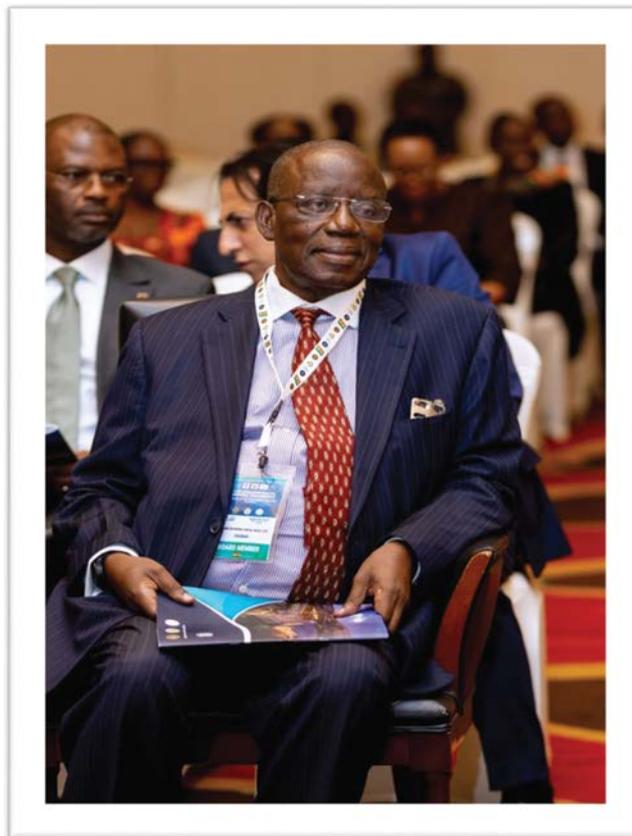
In conclusion, Mr Larkin stated that the evolving landscape of asset recovery demands innovative and robust approaches to manage the growing complexities of digital assets. Asset Reality remains at the forefront of this effort, providing expertise and cutting-edge tools to help organisations secure, manage and realise the value of seized assets effectively. For more information, visit www.assetreality.com or contact hello@assetreality.com.



Aidan Larkin, Co-founder and CEO of Asset Reality, UK

Introduction of HE the Vice President of the Republic of Ghana by the Board Chairperson, EOCO, Stephen Raymond Dapaa Addo

The Vice President of the Republic of Ghana, HE Dr Alhaji Mahamudu Bawumia, was introduced by Board Chairperson of the Economic and Organised Crime Office (EOCO), Stephen Raymond Dapaa Addo.



Stephen Raymond Dapaa Addo, Board Chairperson, EOCO

Speech by HE Dr Alhaji Mahamudu Bawumia, Vice President, the Republic of Ghana: 'The need for digitisation: a tool to fight corruption in Africa'

As part of the programme of the Vice President, HE Dr Alhaji Mahamud Bawumia addressed the conference, noting that Ghana has made significant strides in fighting corruption through digitalisation, and by reducing bribery, revenue leakages and fraudulent payroll practices. The introduction of the biometric Ghana Card has enabled authorities to track individuals more effectively by linking their identification to bank accounts, SIM cards, tax records and government services. This initiative increased tax identification coverage from 4 to 85 per cent in the last 4 years and eliminated thousands of 'ghost workers' and pensioners, saving the government more than 800 million Ghana new cedis annually. Additionally, the Ghana.gov platform, which now hosts 99 per cent of government agencies, has minimised human interference in transactions, preventing bribe-taking and increasing transparency.

The Vice President also wished to highlight that, beyond streamlining public services, Ghana is leveraging financial technology to curb corruption. The e-Cedi, a central bank digital currency (CBDC) currently in pilot, is expected to enhance financial transparency by tracking money flows and detecting suspicious activities, reducing fraud and money laundering. The shift to digital payments in passport applications, driver's licenses, port operations, scholarships and health insurance renewals has also closed loopholes for corruption. Since its launch in 2020, the Ghana.gov platform has helped collect 201 billion Ghana new cedis in government revenue, preventing losses from cash-based transactions that previously facilitated corruption.

Looking ahead, he reported that Ghana aims to become the first blockchain-powered government in Africa, ensuring tamper-proof public records and increasing accountability. The Government of Ghana is also investing in digital forensics and AI-driven cybersecurity tools to track and dismantle corruption networks. By embracing advanced technologies, the country is not only fighting corruption but also building a transparent, efficient and accountable public sector, setting an example for the rest of Africa. The challenge now is for anti-corruption and law enforcement agencies to leverage these tools to track, trace and disrupt corruption networks, securing a brighter future for the continent.



HE Dr Alhaji Mahamudu Bawumia, the Vice President of the Republic of Ghana, giving his speech

Day 5: Friday 10 May 2024

Communiqué

Dr Roger Koranteng, Commonwealth Secretariat

Members discussed, adopted and signed the Communiqué during the Annual General Meeting (AGM) of the 14th Conference of Heads of Anti-Corruption Agencies in Commonwealth Africa.

Reading of the Communiqué

Dr Roger Koranteng of the Commonwealth Secretariat read the Communiqué.

This was followed by remarks from the outgoing chairperson and remarks by the new chairperson.

Closing remarks by Deputy Attorney General

Closing remarks were made by the Deputy Attorney-General, Hon. Alfred Tuah Yeboah.

Vote of thanks by the Chief Staff Officer

The vote of thanks was delivered by Chief Staff Officer, Aba Jacqueline Opoku.

Annexes

Annex 1. Conference Agenda

Commonwealth Secretariat and the Republic of Ghana

14th Commonwealth Regional Conference for Heads of Anti-Corruption

Agencies in Africa

Kempinski Gold Coast City Hotel, Accra, Ghana

6–11 May 2024

'Strengthening Institutions and Promoting Transparency: A Means of Fighting Corruption in Commonwealth Africa'

Sunday, 5 May 2024

Time	Topic	Resource Person(s)
All Day	Arrivals Check in – 1. Kempinski Gold Coast City Hotel, Accra 2. Movenpick Ambassador Hotel, Accra	Protocol Team

Monday, 6 May 2024

Time	Topic	Resource Person(s)
Master of Ceremonies: Winston Amoah		
Conference Co-ordinator: Dr Roger Koranteng, Commonwealth Secretariat, UK		
0800–0850	Registration of heads of ACAs and invited guests <u>All guests to be seated by 0850</u>	The Commonwealth Secretariat
0900–0910	Arrival of guests of honour followed by the national anthem of Ghana by the Ghana Police Service Band	
0910–0920	Welcome remarks	Maame Yaa Tiwaa Addo- Danquah, Executive Director Economic and Organised Crime Office, Ghana
0920–0930	Conference overview, objectives and expected outcomes	Dr Roger Koranteng Head, Public Sector Governance, Commonwealth Secretariat, UK

(Continued)

Time	Topic	Resource Person(s)
0930–0940	Remarks by the Assistant Secretary-General of the Commonwealth	Professor Luis Franceschi, Assistant Secretary-General Commonwealth Secretariat
0945–0955	A short presentation against corruption	Noyam African Dance Institute
0955–1005	A message from the Rt Hon. Patricia Scotland, KC Secretary-General of the Commonwealth	Video Message
1005–1015	Remarks by the British Deputy High Commissioner	Keith McMahon
1015–1025	Remarks by the Attorney-General and Minister of Justice	Hon. Godfred Yeboah Dame
1025–1035	Musical interlude	Ghana Police Service Band
1035–1050		

1050–1055	Vote of thanks	May De Silva Chairperson, Association of Anti-Corruption Agencies in Commonwealth Africa and Commissioner, Seychelles Anti-Corruption Commission.
1055–1110	Official photograph	Heads of Delegation
1110–1130	Refreshments	
1130–1210	Weathering practical pitfalls in investigation and prosecution of corruption cases Justice Afia Serwah Asare-Botwe Justice of the Appeal Court of Ghana Judicial Service Accra	Chair Uganda
	Questions and Discussion	
1210–1300	Presentations by countries (max 20mins) • Nigeria (EFCC) • Tanzania	Chair Ghana (CHRAJ)
	Questions and Discussion	
1300–1400	Lunch break	
1400–1500	Presentations by countries (20mins each) • Lesotho • Seychelles	Chair Namibia
	Questions and Discussion	

(Continued)

Time	Topic	Resource Person(s)
1500–1645	Institutional empowerment: a path to independence, effectiveness, transparency and accountability	Chair Dr George Larbi
	Samuel Bwana Manager at the Integrity Vice Presidency World Bank Group Washington DC, USA	
	Questions and Discussion	
1645–1700	Tea – Coffee break	
1700–1745	International asset recovery: challenges and solutions	Chair Seychelles
	Simon Marsh, Head, Southern and Eastern Africa International Centre for Asset Recovery Basel Institute on Governance Nairobi, Kenya	
	Questions and Discussion	
1900	Official welcome dinner	

Tuesday, 7 May 2024

Time	Topic	Resource Person(s)
0830–0915	Lessons and challenges from the Commonwealth Caribbean in the fight against corruption: recommendations for strengthening oversight bodies	Chair Sierra Leone
	Julian Johnson Former Chairman Integrity Commission Dominica, West Indies	
	Questions and Discussion	
0915–1000	Global operational network of anti-corruption law enforcement authorities	Chair Nigeria (ICPC)
	Kodjo Attisso Corruption and Economic Crime Branch United Nations Office on Drugs and Crime Vienna, Austria	
	Questions and Discussion	
1000–1030	Tea – Coffee break	
1030–1200	Challenges facing heads of anti-corruption agencies	
	Rose Nunu Seretse Former Director-General DCEC	
	Questions and Discussion	
1200–1300	Presentations by countries (20mins each)	Chair Raymond Muhala
	<ul style="list-style-type: none"> • Mauritius • Namibia • Zambia 	
	Questions and Discussion	
1300–1400	Lunch Break	

(Continued)

Time	Topic	Resource Person(s)
1400–1450	Presentations by countries (20mins each) <ul style="list-style-type: none"> • Uganda • South Africa 	Chair K. K. Amoah
	Questions and Discussion	
1450–1600	Presentations by countries (20 mins each) <ul style="list-style-type: none"> • Ghana (EOCO) • Ghana (OSP) • Ghana (CHRAJ) 	Chair Botswana
	Questions and Discussion	
1600–1630	Tea – Coffee break	
1630–1715	Transparency in fisheries in Africa Dr Godfred Ameyaw Asiedu Regional Coordinator for Anglophone Africa Fisheries Transparency Initiative (FITI) Ghana	Chair Zambia
	Questions and Discussion	

Wednesday, 8 May 2024

Time	Topic	Resource Person(s)
0830–0915	The IACCC law enforcement capability – lessons learnt and guiding principles eight years later Michael Petkov Trudi Abadi International Anti-Corruption Coordination Centre NCA Intelligence Manager, NTC-IACCC UK	Chair Ghana (OSP)
0915–1005	Presentations by countries (20mins each) <ul style="list-style-type: none"> • Kenya • Eswatini 	Chair Cameroon
	Questions and Discussion	
1005–1045	Strengthening institutions and promoting transparency: the crucial role of non-state actors in anti-corruption for sustainable development in Commonwealth Africa Mary Addah Executive Secretary Ghana Integrity Initiative	Chair Tanzania
	Questions and Discussion	
1045–1100	Tea – Coffee break	
1100–1140	Strategies for overcoming corruption challenges in Africa Dr Roger Koranteng Head, Public Sector Governance Commonwealth Secretariat, UK	Chair Nigeria (EFCC)
	Questions and Discussion	

(Continued)

Time	Topic	Resource Person(s)
1140–1220	Engaging civil society in the fight against corruption Dr Hady Fink Adviser Partnership for Transparency Europe	Chair Ghana (EOCO)
	Questions and Discussion	
1220–1310	Presentations by countries (20 mins each) • Togo • Rwanda	Mr Patrick Kwateng Acheampomg, former Inspector- General of Police
	Questions and Discussion	
1310–1410	Lunch break	
1410–1500	Strengthening institutions and promoting transparency: a means of fighting corruption in Commonwealth Africa Youssoupha Ndiaye, Principal Integrity Officer, and Mariame Krauer-Diaby, Principal Governance Specialist (Anti-corruption) African Development Bank Abidjan, Ivory Coast	Chair Mauritius
	Questions and Discussion	
1500–1615	Presentations by countries (20 mins each) • Malawi • Nigeria (ICPC) • Cameroon	Chair Kenya
	Questions and Discussion	
1615–1630	Tea – Coffee break	
1630–1715	Supply chain due diligence for anti- corruption: OECD responsible business conduct instruments Luca Maiotti Policy Analyst, Mineral Supply Chains OECD Centre for Responsible Business Conduct, Directorate for Financial and Enterprise Affairs	Chair Zambia
	Questions and Discussion	

Thursday, 9 May 2024

Time	Topic	Resource Person(s)
0900–0940	Forging partnerships: blueprint for forensic investigations and asset recovery in Commonwealth Africa Amaechi Nsofor Partner, Head of Africa, Insolvency and Asset Recovery Grant Thornton UK LLP	Chair Tymon Katlholo
	Questions and Discussion	

(Continued)

Time	Topic	Resource Person(s)
0950–1040	Presentations by countries (20 mins each) <ul style="list-style-type: none"> • Sierra Leone • Botswana 	Chair South Africa
	Questions and Discussion	
1130–1215	Tea – Coffee break	
1215–1300	Cryptocurrency and asset management Aiden Larkin Asset Reality London	Chair Lesotho
	Questions and Discussion	
1300–1400	Lunch break	
1400–1500	Programme of Vice President of the Republic of Ghana <ul style="list-style-type: none"> • Welcome by traditional dancers • Anthem by Ghana Police Service Band • Introduction by chair of the session • Speech by HE Dr Alhaji Mahamudu Bawumia, the Vice President of the Republic of Ghana • The need for digitalisation: toll to fight corruption in Africa 	Chair Stephen Raymond Dapaa Addo Board Chair (EOCO)
	Questions and Discussion	
	Vote of Thanks	COP Maame Yaa Tiwaa ADDO- DANQUAH, Executive Director, EOCO
	Ghana	Ghana Police Service Band
	Photograph with Heads of Delegation	
1000–1050		Chair South Africa
1430–1730	Accra sightseeing	

Friday, 10 May 2024 – Sightseeing will be organised for those not attending the Annual General Meeting (AGM).

**Annual General Meeting of Heads of Anti-Corruption Agencies and Heads of Delegation only
Other Anti-Corruption Agencies' delegates may attend as observers**

Time	Topic	Resource Person(s)
0900–1100	Discussion of Communiqué	Dr Roger Koranteng Commonwealth Secretariat
1100–1130	Tea – Coffee Break	
1130–1300	Annual General Meeting of the Heads of ACAs or Representatives <i>(Agenda will be provided in consultation with AAACoA Chairperson)</i>	Chairperson AAACoA Dr Roger Koranteng Commonwealth Secretariat
1300–1400	Lunch Break	
1400–1500	Closing <i>(media will be invited)</i> Reading of the Communiqué Remarks by outgoing chairperson Closing remarks by new chairperson Closing remarks by Deputy AG Vote of thanks	Dr Roger Koranteng Commonwealth Secretariat Chairperson AAACoA Incoming chairperson Alfred Tuah Yeboah CSO Aba Jacqueline Opoku
1500–1530	Tea – Coffee break	

Saturday, 11 May 2024

Time	Topic	Resource Person(s)
0730	Departure from hotel to Cape Coast Castle	Conference Secretariat/ Protocol
1000–1200	Cape Coast Castle: A historical site recognised by UNESCO as a World Heritage Site, which is home to the 'Door of No Return', through which millions of Africans were forced onto slave ships bound for West Indies and the United States.	
1200–1330	Lunch at Royal Ridge Hotel	
1400–	Departure from Royal Ridge Hotel to Accra	

Sunday, 12 May 2024 Departures

Time	Topic	Resource Person(s)
	Departure	Protocol

Annex 2. Maame Yaa Tiwaa Addo-Danquah, Economic and Organised Crime Office

Hon. Godfred Yeboah Dame, Attorney-General and Minister of Justice,

Honourable Ministers of State, senior government officials present,

Your Excellency Mr Keith McMahon, Deputy High Commissioner to Ghana representing the High Commissioner, Mrs Harriet Thompson,

Your Excellencies, members of the diplomatic Corp present,

Professor Luis Franceschi, the Assistant Secretary-General of the Commonwealth,

Dr Roger Opong Koranteng, Head, Public Sector Governance, Commonwealth Secretariat,

The Chairperson of the Association of Anti-Corruption Agencies in Commonwealth Africa and Commissioner, Seychelles Anti-Corruption Commission, Ms May De Silva,

The Board Chairman of the Economic and Organised Crime Office, Mr Raymond Stephen Dapaa Addo and members of the Board,

The Special Prosecutor, Mr Kissi Adjabeng,

Commissioner for Human Rights and Administrative Justice represented by the Deputy Commissioner Mrs Mercy Larbi,

Heads of Anti-Corruption Agencies in Commonwealth Africa,

The Auditor-General, Mr Johnson Akuamoah Asiedu,

The Director-General Internal Audit Agency, Dr Eric Oduro Osae,

Heads and members of civil society organisations (Ghana Integrity Initiative [the local chapter of Transparency International], Ghana Anti-Corruption Coalition, Centre for Democratic Development),

The President of the Ghana Journalists Association,

Members of the media, distinguished delegates, invited guests, ladies and gentlemen.

It is a great pleasure and honour for the Economic and Organised Crime Office (EOCO) to host on behalf of the Government of Ghana this esteemed gathering of distinguished leaders and experts. As the Executive Director of EOCO, I welcome you all to the 14th Commonwealth Regional Conference and Annual General Meeting of Heads of Anti-Corruption Agencies in Commonwealth Africa under the theme 'Strengthening Institutions and Promoting Transparency: A means of fighting Corruption in Commonwealth Africa'. This conference brings together representatives of 24 anti-corruption institutions from 20 Commonwealth Africa Countries in our shared quest to combat corruption.

It is worth noting that Ghana was originally scheduled to host this conference in 2026. However, due to circumstances beyond the control of the two countries that should have preceded Ghana, the mantle fell on us to host the conference in 2024. I am therefore grateful for the unwavering support of the Government of Ghana,

which recognised the urgency of our mission and graciously provided the necessary funding to expedite this conference. This gesture is a testament to the President's commitment to tackling corruption head-on with the view to creating a more just and equitable Africa society. We are deeply appreciative of this support, which has enabled us to convene this critical gathering two years ahead of schedule. The President is here in person today to grace the opening ceremony and be part of the conversation.

Distinguished ladies and gentlemen, permit me to recognise our own Dr Roger Oppong Koranteng, Head of Public Sector Governance at the Commonwealth Secretariat. The annual conferences across the Commonwealth regions are his brainchild. His numerous achievements include the establishment of vibrant associations of anti-corruption agencies in Commonwealth Africa and other Commonwealth regions to promote interagency collaboration and learning through capacity building, sharing of experiences and best practices. He has received many global awards for his work in governance and anti-corruption within the Commonwealth. Dr Koranteng, your tireless efforts in leading the fight against corruption, your dedication and expertise are the driving forces behind this Association. We are proud of you.

This conference represents a pivotal moment for our collective efforts to address one of the most pressing challenges facing our nations. Corruption undermines the very fabric of our societies, corrodes public confidence in our institutions and suppresses economic development. As representatives of anti-corruption agencies from across Commonwealth Africa, we bear a solemn duty to confront this menace head-on and uphold the principles of integrity, the rule of law, transparency and accountability.

Over the next few days, we have a unique opportunity to engage in constructive dialogue, share experiences and forge meaningful partnerships that will strengthen our capacity to combat corruption effectively. The exchange of ideas and best practices will be invaluable as we seek to identify innovative strategies and solutions to the complex and evolving nature of corruption in our respective countries and learn from each other's successes and setbacks.

I urge each of you to actively participate in the discussions, listen with an open mind, and contribute your perspectives and knowledge towards our common goal. Together, we can leverage the collective wisdom and experiences of this esteemed assembly to chart a course towards a future free from the shackles of corruption. As we embark on this journey, let us remain steadfast in our commitment to uphold the values of integrity, accountability and justice. Let us work tirelessly to restore public trust in our institutions and build a brighter, more prosperous future for all our citizens.

Once again, I extend my warmest welcome to every one of you to our beautiful country. May our deliberations be rewarding, our bonds strengthened, and our resolve fortified in the pursuit of a corruption-free Commonwealth Africa. Let us embark on this crucial journey together! Let the conversations begin!

Thank you.

Annex 3. Dr Roger Koranteng, Head, Public Sector Governance, Commonwealth Secretariat

Your Excellency, Nana Addo Danquah Akufo-Addo, The President of the Republic of Ghana, Professor Luis Franceschi, the Assistant Secretary-General of the Commonwealth; Hon. Godfred Yeboah Odame, Attorney-General and Minister of Justice; Hon. Ministers and senior Government Officials, COP. Maame Tiwaa Addo-Danquah, Executive Director, Economic and Organised Crime Office; Heads of Anti-Corruption Agencies in Commonwealth Africa, our partners - international organisations, distinguished invited guests, the press corps, ladies and gentlemen. Good morning!

I would like to support the Executive Director, EOCO, to welcome you all to our beautiful, the most hospitable, the friendliest, and Gods own country, Ghana. Home to the best cuisine including the best and most delicious jollof rice! Better than our neighbours.

I would like to briefly touch on the genesis of the Annual Commonwealth Regional Conferences which is the flagship activity of the Association of Anti-Corruption Agencies in Commonwealth Africa and how far it has travelled before I end on the conference overview.

I left the shores of Ghana over a decade ago to join the Commonwealth Secretariat in London UK. When I arrived there, I was awed by fact that the Commonwealth Secretariat Office is located at Marlborough House, which is one of the most iconic buildings in the world. At Marlborough House, were and still are priceless wall paintings and other treasuries with clear instructions, don't touch, no photographs. So, it means, come sit down and do your work, stir at these great paintings if you want to, and go away. They are indeed priceless state assets.

I was appointed to this new position called Adviser Governance, which had just been established. Which meant I have no predecessor or precedent to follow. When I asked my boss at the time to explain to me, in simple terms, my role. He looked at me and said I have no clue, but it was for that reason you have been recruited, so go and figure it out. I knew governance is very broad and my job description didn't help. Just like in most international organisations, my JD was about 5 pages, like the kitchen sink. As if everything they can't figure out where it belonged at the Secretariat would find their way into my governance job description (JD).

My JD indicated I was the principal governance specialist at the Commonwealth Secretariat, and I said to myself who told them that. And that, I was responsible for supporting all democratic, integrity, accountability, and oversight institutions in Commonwealth member countries. The good thing about such a broad and wide-ranging job description was that I had the freedom to make my mark, chart my own course and to decide what projects I wanted to work on. So, I decided to work with various oversight institutions such as the Supreme Audit Institutions, offices of ombudsman, parliament public accounts committees, and of course, anti-corruption agencies.

I realised that all these institutions were somewhat organised within the Commonwealth and were having regular meetings except for Anti-Corruption

Agencies. I must say, however, that there were sub-regional associations such as that of East Africa, West Africa and Southern Africa but with no Commonwealth wide focus.

It was at this point that I decided to focus more on anti-corruption in the Commonwealth. I started off on capacity building and also, assisted countries to implement their national anti-corruption strategies by mobilising all key institutions and other stakeholders involved in monitoring, detecting and responding to corruption-related issues. This in-country anti-corruption project started off in African Commonwealth countries – Botswana, Zambia, Ghana, Lesotho, Namibia, Sierra Leone, South Africa, Mauritius, etc. – before expanding to the Caribbean region – Dominica, Saint Lucia, Grenada, and St Vincent and the Grenadines – and to Singapore, Sri Lanka and Malaysia in Asia.

Following years of in-country anti-corruption work across the Commonwealth and realising I could not cover all the 56 Commonwealth countries by myself I decided to have a regional approach for my anti-corruption work, by forming regional associations. I decided to start from Africa. So, in 2011, I invited all heads of ACAs in Commonwealth Africa to a conference in Botswana. A direct result or outcome of the first conference was the creation of the Association of Anti-Corruption Agencies in Commonwealth Africa.

I informed the conference that the main objective of the conference was to form an association to broker the exchange of ideas and practices among Commonwealth Africa ACAs and the sharing of expertise in areas where they have a comparative advantage. I also informed them the host and venue for the annual conference would rotate among member countries. This led to the institutionalisation of an annual anti-corruption conference of the heads of ACAs. Only two of the heads of ACAs who attended the very first conference are still in post and are present in this conference. Dr Massi Gamms of Cameroon and Mr. Paulos Noa of Namibia. Call them founding members of our association.

After Botswana, the second conference for heads of ACAs was in May 2012 in Livingstone, Zambia. At the conference I conducted a needs assessment of all the ACAs and over 95 per cent indicated lack of a structured and systematic capacity building for their staff. It became clear to me that a training centre should be my next focus. I then informed the heads of ACAs to discuss with their respective governments to consider the possibility of sponsoring and hosting the training Centre for ACAs. I received positive proposals from Botswana, Mauritius, and the Gambia for hosting the training centre.

Indeed, Botswana offered the most concrete proposal to host the training centre for the ACAs – which is named the Commonwealth Africa Anti-Corruption Centre.

I drafted an agreement document having negotiated with the then Secretary-General of the Commonwealth for a quantum of funds for the centre activities and requested in kind contribution from the government of Botswana. In February 2013, the government of Botswana and the Commonwealth Secretariat jointly commissioned the centre and signed the agreement document. All heads of ACAs witnessed the signing of the agreement document and endorsed it.

After the launch of the centre, the government of Botswana through DCEC requested the Secretary-General of Commonwealth to release me to go to Botswana to operationalise the centre. I therefore went and stayed in Gaborone, Botswana for a period of 3 months to operationalise the centre. I designed and ran various training programmes with assigned centre staff as a way of impacting knowledge and skills to them.

I then returned to my base in London after the centre was fully operational and was up and running. Even then for the following 11 years to date I have been going to Botswana to mentor, advise and deliver training programmes at the Centre.

In 2015, I replicated the same model in the Commonwealth Caribbean where I have established a vibrant Commonwealth Caribbean Association and a centre of excellence in Grenada.

On top of this, I have delivered over 200 executive development seminars, senior government officials and cabinet retreats in over 50 countries around the world.

Over the last 13 years The Commonwealth Secretariat has organised the regional conferences at interesting places in Africa. From Gaborone in Botswana, Livingstone, Victoria falls in Zambia, Port Louis in Mauritius, Dar es Salam in Tanzania, Swakopmund in Namibia, Mangochi, Lake Malawi in Malawi, Federal Capital City Abuja in Nigeria, Kampala in Uganda, Kigali in Rwanda, Seychelles, and this year we back in Accra, Ghana, exactly 10 years after Ghana hosted the conference in 2014. This indicates how far we how we have travelled, as a vibrant association which enabled us to explore our own continent, as we share experiences, best practices, and solutions in the fight against corruption.

In terms of the conference overview, the conference programme is in three parts - the opening ceremony, 4-day technical sessions, AGM, and of course the sightseeing.

The objective of the conference is to bring together anti-corruption agencies in Commonwealth Africa, relevant international organisations, and partners to share experiences, best practices and learn lessons for the fight against corruption.

The opening ceremony set the tone for the conference as we receive a welcome message from our host, the Executive Director, EOCO, remarks by the Assistant Secretary-General of the Commonwealth, the British Deputy High Commissioner, the Hon. Attorney-General & Minister of Justice and a message from the Secretary-General of the Commonwealth.

The highlight of the conference will be the keynote address and declaration of the opening of the conference by H.E. Nana Addo Danquah Akufo-Addo, President of the Republic of Ghana to be delivered by Hon Godfred Odame, Attorney-General and minister of Justice. After which the Commissioner, Anti-Corruption Commission, Seychelles and Chairperson of the Association will offer the vote thanks.

The technical sessions will take 3 and half days, within which the conference business will be conducted. These comprise of country reports, expert presentations, questions and answer sessions, and networking during in and out of sessions.

Half of day 4 is reserved for sightseeing in Accra. However, on Saturday there will be a return day trip to the cape coast castle. There will a welcome and closing dinners in the evenings of today and Friday.

Day 5 will be the AGM. The AGM is the final part of the Conference programme where the Heads of ACAs will discuss issues of interest to the Association, select the country to host the next conference. And issue the conference Communique.

The Conference is expected to come up with important resolutions useful for the fight against corruption. Sharing best practices will help member countries to learn from others to enable them to initiate or update their strategies to fight corruption.

At this juncture, I have the honour to thank you, Your Excellency, Nana Addo Danquah Akufo-Addo, President of the Republic of Ghana, represented by the Attorney-General and Minister of Justice, for finding time out of your very busy schedule to open this 14th Commonwealth regional conference this morning. Thank you for coming Sir.

The presence of the Assistant Secretary-General (ASG) of the Commonwealth at this conference reaffirms commitment of the Commonwealth Secretariat to support member countries' anti-corruption effort to root out systemic corruption at both national and international levels. I know you are leaving tomorrow evening for another important schedule, but sorry for pulling down you here. Thank you for coming ASG.

Now this is personal to me, there is beautiful young lady here who celebrated her 80th birthday late last year. Give her the credit for my achievements and give her my blames because she brought me up. I lived with her from my tender age till I became an adult. Join me in appreciating Mrs Adelaide Mary Benneh, She is the Dwantoahemaa of the Akyem Abuakwa traditional Council. Sisi thank you!

I thank and appreciate the hardworking, result-oriented and outstanding personality, COP Maame Tiwaa Adoo Danquah, for working so hard over many months to pull off the wonderful conference.

I also thank the local organising committee, chaired by the Deputy Attorney-General and deputy Minister of Justice, for doing an excellent job so far.

Finally, but not the least, all the delegates and invited guests' thanks very much for responding generously to our invitations.

My hope and prayers are that the Association will continue to grow from strength to strength as we strive to control and reduce corruption in the Caribbean.

I look forward to an exciting conference.

I thank you.

Annex 4. Remarks by Professor Luis Franceschi, Assistant Secretary-General of the Commonwealth

Honourable Minister, Godfred Yeboah Dame, Madam Executive Director of the Economic and Organised Crime Office, Excellencies, distinguished delegates, heads of anti-corruption bodies, ladies and gentlemen,

I am French by descent, Venezuelan by birth, and Kenyan by choice. My life has been shaped by movements across the world, influenced by the legacies of the First and Second World Wars and the Commonwealth. In my veins runs the heritage of three nations, each grappling with the complex histories of corruption and colonisation—perhaps striving to overcome their past and present in pursuit of a better future.

The world is undergoing radical transformation. Technology, politics, governance, and human behaviour are facing immense pressures, particularly in the areas of accountability and efficiency. We seek to enhance governance efficiency, a demand driven by the public, the media, and, more recently, the rise of social media. Today, we no longer have the luxury of deferring action; problems must be resolved immediately. As the saying goes, "God, grant me patience—but I want it now."

At the same time, transparency remains paramount. Efforts to enhance transparency have led to the creation of numerous bureaucratic steps. I recently learned of an institution where a single project requires 198 procedural steps from conception to execution. While intended to ensure integrity, such excessive bureaucracy often undermines the very transparency it seeks to achieve. Meanwhile, we are also faced with the complexities of modern financial crimes, including offshore accounts, crypto-guarantees, virtual assets, and unregulated transactions—challenges that did not exist a few decades ago. Just as electoral observation has evolved from physical oversight to technical and digital scrutiny, so too must our anti-corruption strategies adapt to this new reality.

Today, I wish to share some reflections on elections, independence, and the challenge of corruption, particularly in Africa.

I have witnessed elections that were entirely transparent—where citizens voted freely, observers monitored diligently, votes were counted fairly, and results were announced openly. It all seemed straightforward. However, today's elections are far more complex, intertwined with issues of independence and integrity. True independence demands courage; it requires leaders to uphold the law, even when that means investigating those who facilitated their rise to power. This is a daunting task—one that may render them national heroes in the eyes of some and traitors in the eyes of others. Yet, true leadership is about placing national aspirations above personal loyalties.

Corruption remains one of the greatest impediments to development, not just in Africa but across the world. It is incoherent, disunited, and deeply compromising. Different nations approach corruption and its consequences in vastly different ways, and while corruption thrives on division, our collective response must be one of unity.

The global cost of corruption is staggering—USD 3.6 trillion annually. Of this, USD 1 trillion is paid in bribes, and an estimated USD 2.6 trillion is stolen. This amounts to over 5% of the global GDP. In Africa alone, corruption is estimated to cost between USD 20-40 billion per year, equivalent to up to 40% of some nations' GDP. It is also responsible for an estimated 40% loss in official development assistance (ODA). Between 1980 and 2018, Sub-Saharan Africa received nearly USD 2 trillion in foreign direct investment and ODA, yet over USD 1 trillion was lost through illicit financial flows. Given that Africa possesses 40% of the world's mineral wealth and a dynamic, youthful population, it is inconceivable that it continues to lag in global economic performance. Something is profoundly amiss.

Where are the dreams of Africa's great founders—Nyerere, Kaunda, Nkrumah, Mandela? Where are the leaders who will usher in the transformative change we seek? Transparency International estimates that corruption costs the global health sector USD 500 billion annually—more than what is needed to achieve universal health coverage worldwide. The figures are astronomical.

But there is good news. In Africa, Commonwealth nations are perceived to be less corrupt. According to the Corruption Perceptions Index (CPI) and the Mo Ibrahim Index, 8 to 9 out of the 10 best-performing African countries in terms of governance and anti-corruption efforts are members of the Commonwealth. Furthermore, no African Commonwealth country ranks among the 10 most corrupt nations globally. While this is encouraging, it is not a cause for complacency. To say, "I am pleased that none of my children have been sentenced to death" is hardly a source of pride.

So, what can we do? The Commonwealth is a remarkable institution—56 nations united in a unique intergovernmental framework, language and customs, bound by shared values and aspirations. This unity was forged, in part, by those African leaders I mentioned above, Kwame Nkrumah, Julius Nyerere, Kenneth Kaunda, and Nelson Mandela, who challenged the status quo and demanded equal standing within the Commonwealth. In response, Queen Elizabeth II and British leadership facilitated the transformation of the Commonwealth from a mere department within the UK Foreign Office into an independent, multilateral organisation where all members sit at the table as equals.

Some mistakenly refer to the Commonwealth as the "British Commonwealth"—but let me be clear: the Commonwealth is not British, Kenyan, Canadian, or Samoan. It is a global family—an alliance born of shared historical challenges, struggles, opportunities, and triumphs. It is through this spirit of cooperation that we advance good governance, accountability, judicial reform, human rights, climate action, and trade.

Just last week in London, we hosted a gathering of cabinet secretaries from all 56 member states. A highlight of the meeting was India's offer to provide e-governance systems to any Commonwealth country, free of charge. This is the essence of Commonwealth collaboration—where nations share resources, expertise, and innovation for mutual benefit. A small nation like Samoa or Tonga may lack the financial means to develop an e-governance system, but through the Commonwealth, they can access cutting-edge technology from larger member countries like India, Nigeria, or Bangladesh.

Our anti-corruption efforts follow a three-pronged approach: research, capacity building, and networking. The Commonwealth's anti-corruption benchmarks help member states align with international best practices, while our toolkits provide

practical resources for enforcement agencies. These initiatives are making a difference, and the progress we have achieved thus far is a testament to the commitment and cooperation of all our partners.

I remain optimistic that Commonwealth Africa is turning the tide against corruption. Thank you Ghana for hosting us so graciously. Through continued collaboration, we can strengthen governance, enhance transparency, and foster a culture of accountability. This conference is a vital step in our collective journey. While we cannot guarantee success, we can certainly guarantee failure—by giving up. And that is not an option.

Thank you.

Annex 5. Remarks by Rt Hon. Patricia Scotland, KC, Secretary- General of the Commonwealth

Excellencies, Honourable Ministers, Heads of anti-corruption bodies, distinguished delegates, colleagues and friends, I think you all know how important this agenda is to me, and to the Commonwealth – and I dearly wish I could be with you in person in beautiful Accra – but I am grateful for this opportunity to join you virtually. This annual gathering of Anti-Corruption Agencies in Africa is a vital opportunity to collaborate and encourage one another in the spirit of Commonwealth goodwill and mutual support. Together, we join up our work, and we scale up our impact. This is essential in view of our present challenges.

The global cost of corruption exceeds USD 3.5 trillion each year. In developing countries, funds lost to corruption are around 10 times the amount of official development assistance. Africa loses more than USD 50 billion a year to illicit financial flows. Indeed, over the last 50 years, Africa's loss to corruption has exceeded the total of all the ODA received during the same period. What we lose to corruption is more than enough to lift everybody out of poverty and deliver the SDGs. It is a serious crime which can undermine social and economic development in all societies. No country, region or community is immune. And every part of society is damaged. So, tackling corruption must be a priority of the highest order if we are serious about implementing the SDGs – and we are. Tackling corruption will bring multiple benefits; poverty will be reduced, economic stability and growth will be increased, and standards of living will be raised.

This is why this conference is of immense importance, for the Africa region, and for the wider Commonwealth – and your theme – strengthening institutions and promoting transparency – gets to the heart of the matter. Transparency is central to accountability, and accountability is essential in building confidence that our institutions and systems are corruption-free. The Commonwealth Secretariat is absolutely committed to supporting your effort. Since we created the Association of Anti-Corruption Agencies in Commonwealth Africa in 2013, we have seen a clear strengthening of anti-corruption efforts, as a direct result of the collaboration this network has encouraged and facilitated. The Commonwealth Anti-Corruption Centre in Botswana has enabled the delivery of key capacity-building programmes for anti-corruption agencies across Commonwealth Africa. Our *Anti-Corruption Benchmarks* set a new international standard, creating more robust incentives for both the public and private sectors to undertake anti-corruption measures. And now, through our world-leading partnerships with technology giants such as Intel, we are training thousands of government officials in the application of new technologies which can help to develop automated warning systems where there is a corruption risk in sensitive procurements, or conflicts of interest.

These systems, which were unimaginable before and which are now possible, could help to constrain corruption and save billions of dollars for development. By developing new thinking, sharing our knowledge of what has worked – and better understanding what has not – we can help everyone to move in the right direction with principled, practical, effective and forward-thinking action. And as I have said

many times, while our challenges are real and complex, together we are more than equal to them. So let us work together with renewed vigour, in hope and harmony, to bring health, wholeness, security and prosperity to our Commonwealth.

I wish you a happy and fruitful conference. And I look forward to seeing you again in person before long. Thank you.

Annex 6. Remarks by the British Deputy High Commissioner

Good Monday morning to everyone. I'm relieved that Alderman isn't here to steal my opening line! I was going to highlight how fitting it is to have a Scotsman like me follow Baroness Scotland. And with this morning's rain, Madam Executive Secretary of EOCO, you've certainly made me feel at home – well done and bravo!

Honourable Attorney-General, minister of justice, ministers of state, distinguished guests, Professor Luis Franceschi, Assistant Secretary-General of the Commonwealth, Executive Director of EOCO, Maame Tiwaa Addo-Danquah, ladies and gentlemen, and, as Luis aptly said earlier, all protocols observed.

It is truly an honour to speak at the opening of the 14th Commonwealth Regional Conference of Heads of Anti-Corruption Agencies in Africa. This gathering underscores the vital need to address one of the most significant threats to development and governance globally – corruption.

The fight against corruption is not just a moral imperative but a crucial step toward global progress. As highlighted in the UK Government's recent White Paper on International Development, corruption and illicit financial flows weaken governments' abilities to provide services, stymie public investment and undermine the foundations of long-term development.

Corruption also fuels geopolitical risks, finances violent conflicts, and enables organised crime and terrorism. It destroys our environment, plunders natural resources and obstructs the achievement of development goals.

But let's be clear: no jurisdiction in the world is immune to corruption. It's a global issue that transcends borders and requires collective action. That's why I find it so inspiring to see heads of anti-corruption agencies from across the Commonwealth in Africa coming together this week.

We are all in this together. No country can afford to be complacent about corruption, and it often takes the form of sophisticated international schemes. The UK, for instance, is not exempt – its property market, financial services sector, and overseas territories are often targeted for laundering the proceeds of crime.

The UK's commitment

The UK is committed to supporting efforts to combat corruption and illicit finance globally. We are proud to bring a 'whole-of-government' approach, working closely with international partners, including civil society, to make it harder for criminals to move illicit funds and easier to bring perpetrators to justice.

In January 2022, the UK launched its Framework for Transparent and Accountable Asset Returns, a milestone in our fight against corruption. This framework ensures clarity and transparency in returning recovered assets.

We've also strengthened our legal tools with two landmark Economic Crime Acts, which include new powers to seize crypto assets, enhance intelligence gathering and tackle money laundering more effectively.

The UK also hosts the International Anti-Corruption Coordination Centre (IACC) at the National Crime Agency. The IACC is a global, multi-agency law enforcement unit that supports countries in tackling high-profile corruption cases, gathering intelligence and recovering stolen assets.

Since its inception in 2017, the IACC has identified over GBP 1.4 billion in assets suspected to be the proceeds of corruption; helped freeze GBP 623 million of stolen assets; and assisted in the arrest of 47 suspects.

I encourage all anti-corruption agencies represented here to collaborate with the IACC. Together, we can make a meaningful impact in the fight against corruption.

Collaboration with Ghana

Let me commend Ghana's anti-corruption institutions, namely the Economic and Organised Crime Office (EOCO), the Commission on Human Rights and Administrative Justice (CHRAJ), and the Office of the Special Prosecutor for successfully hosting this important conference.

The UK is proud to have partnered with these organisations in building capacity through initiatives like the GBP 4 million Serious and Organised Crime in Ghana (SOC-G) project. We've also collaborated on operational efforts, and His Majesty's Treasury has supported Ghana in its successful removal from the Financial Action Task Force (FATF) grey list.

Additionally, the UK's National Audit Office is designing peer-to-peer capacity-building programmes for the Ghana Audit Service, further demonstrating our commitment to strengthening governance and accountability in Ghana.

Conclusion

Corruption is a global challenge, but we are making progress. By fostering partnerships, building capacity and sharing resources, we can begin to turn the tide.

This conference is a testament to the power of collaboration across the Commonwealth. I am confident it will chart a clear path forward in our collective fight against corruption.

As we embark on this journey together, let us remember we cannot guarantee success, but failure is certain if we give up and giving up is not an option.

Thank you, and I wish you all a successful and productive conference.

Annex 7. Hon. Godfred Yeboah Dame, Attorney-General and Minister for Justice

The Executive Director, Economic and Organised Crime Office – our hostess, distinguished heads of anti-corruption agencies in Commonwealth Africa herein present, members of the diplomatic community, friends of the media, ladies and gentlemen.

May I convey my felicitations to the Executive Director of Ghana's Economic and Organised Crime Office (EOCO) for the excellent preparations made for this conference. EOCO, mandated by law to monitor, prevent, investigate, prosecute and recover proceeds of economic and organised crime, is a key agency of state in the anti-corruption efforts of our country.

Over the course of the week, distinguished guests, I hope you will enjoy your stay in the beautiful city of Accra, capital of Ghana, the Black Star of Africa. Ghana has been the beacon of the quest for democracy, good governance and generally, the rule of law in Africa. Socio-culturally, Accra has a vibrant and riveting life, which I am sure you will take time to explore during the period of your stay. The EOCO Executive Director has the full brief and run down of all the fascinating places around town, and I am sure she will introduce you to the same. You can trust in the warm hospitality of the Ghanaian people.

This forum has brought under one roof those at the helm of the prevention and reduction of corruption in African countries part of the Commonwealth – those charged with curbing abuse to the financial system, and whose voices and actions matter, in the establishment of values that prevent and mitigate the consequences of economic crime and misconduct. The matters to be discussed, no doubt, are of immense importance to our respective countries.

Distinguished guests, the effects of corruption are felt not only nationally but also globally. Resulting in a plunder of national resources, corruption causes injustice in society through the handing of advantage to some, at the expense of others, and stunts the development of the nation. It is perpetrated by all – government officials, businesses, civil society, the media, public servants, religious organisations and the so-called ordinary man. The deployment of sophisticated schemes to circumvent procedures and facilitate the commission of crime and other kinds of improper conduct contribute to the perpetuation of corruption in societies.

I find the array of matters that can be captured under the theme chosen for this conference – 'Strengthening Institutions in Promoting Transparency: A means of Fighting Corruption in Commonwealth Africa' – crucial to the fight against corruption. Transparency, in my respectful view, is the bedrock of integrity and the eradication of corruption. Thus, operating with the clear understanding that the haven for economic crimes is an atmosphere conducive to its concealment, and that access to information remains a vital tool in the elimination of economic crimes, the Government of President Nana Akufo-Addo in 2019, spearheaded the passage of the Right to Information Act 2019 (Act 989). The Act provides for the implementation of the constitutional right to information held by a public institution, to foster a culture of

transparency and accountability in public affairs, subject to a few exemptions allowed by the law and which are necessary and consistent with the protection of the public interest in a democratic environment.

There cannot be any doubt about the cruciality of access to information in the promotion of transparency and public accountability. I have observed an increased utilisation of the Right to Information Act by Ghanaian citizens since its enactment, to access information from public officers. The torch of transparency has really been lit to shine on the actions of public institutions and officials in Ghana. Accountability is indeed the winner.

The Government of Ghana has boosted the whistle-blower regime by promoting an amendment in 2023 to the Whistle-blower Act, 2006 (Act 720). This amendment, passed in July 2023, introduces a reward system for whistle-blowers by ensuring that 30 per cent of all revenue accruing from cases conducted on the strength of a whistle-blower's activity is paid into the Fund, and 10 per cent of the income directly generated by the whistle-blower's efforts is paid to the whistle-blower.

As a person vested with the authority to initiate and conduct prosecutions of criminal offences in the Republic, I have come to understand that any serious endeavour to fight economic crimes must be firmly rooted in the establishment of systems for its deterrence, undertaking of smooth investigations where same occur, and a sound vehicle for prosecution and punishment in a fair and efficient manner. I recognise that Ghana's effort to tackle corruption since the inception of President Akufo-Addo's Government in 2017, embraces an understanding of the way corruption works. This is manifested in the establishment of systems for deterrence, a boost of the means of detection, an undertaking of rapid investigations, and the establishment of a sound vehicle for prosecution and punishment in a fair and just manner.

In this regard, the government has pursued arguably, some of the boldest initiatives in the nation's history to reform the public sector and strengthen the capacity of institutions to tackle corruption. An example is the very innovative establishment of the Office of the Special Prosecutor through an act of parliament, as a body clothed with full independence both in law and, in fact, to carry out investigations and prosecution of corruption and corruption-related offences in the public sector.

Other pieces of anti-corruption legislation passed in recent times, which are part of the raft of measures instituted to create a strong system for deterrence and elimination of corruption, include:

- Revenue Administration (Amendment) Act, 2020 (Act 1029)
- Fiscal Responsibility Act, 2018 (Act 982)
- State Interests and Governance Authority Act, 2019 (Act 990),
- Anti-Money Laundering Act, 2020 (Act 1044)
- Corporate Restructuring and Insolvency Act, 2020 (Act 1015)
- Companies Act, 2019 (Act 992),
- Narcotics Control Commission Act, 2020 (Act 1019)
- Real Estate Agency Act, 2020 (Act 1047)

Corruption sometimes involves the existence of situations taken advantage of by persons entrusted with public power to inflict severe financial hardships on

the state. In order to curb the inimical tendency on the part of public officers to enter into contracts with high rates of interest, especially compound interest which results in huge judgment debt and financial loss to the state, the office of Attorney-General in July 2023 successfully sponsored an amendment to the Contracts Act, 1960 (Act 25) to prohibit the payment of compound interest by the state in transactions entered into on her behalf by public officers. The law, the Contracts (Amendment) Act, 2023 (Act 1114), prohibits public officers from entering a contract on behalf of the state in which the rate of interest is stipulated as compound interest.

Ghana has, in recent times, embarked on a deliberate policy of digitalisation of the Ghanaian environment as a vital tool for enhancing transparency and efficiency in the public sector. Policies like a robust National Identification System, Digital Property Address System, Paperless Port Systems, E-Justice Systems, pensions and insurance data and a digitised Land Title Registry have in their focus the attainment of accountability and efficiency in the public space. A digitised environment ultimately helps to eliminate and prevent corruption in various institutions and agencies. Important institutions of state like the Passport Office, Ports and Harbours, Office of the Registrar of Companies, National Health Insurance Service, and the Driver Vehicle and Licensing Authority, which hitherto were fertile grounds for corrupt activity, have been remarkably transformed. The introduction of the Ghana.Gov platform, making it possible for services to be accessed and payment made online by card without the conduit of 'middlemen', has significantly reduced the risk of public sector corruption through embezzlement.

Distinguished guests, the fight against corruption also requires honesty and integrity in the disclosure of results. There must be the avoidance of sensationalism by all involved – investigative bodies, civil society and the public. It augurs well for the fight if the results of corruption allegations against public officers, particularly senior members of government, which are investigated and refuted or unsubstantiated, are fully put out by investigative bodies. Thus, investigative bodies must be honest and bold enough to disclose to the public the full results of investigations into allegations of corruption against members of government which turn out to be untrue. This is one sure way to boost the confidence of the public in their government and will reduce the suspicions, distrust and cynicism with which the public views officeholders. After all, it is a truism that not every public officeholder is corrupt. Investigative authorities must discard the view that the only way to remain relevant is by keeping the flame of allegations of corruption against public officeholders burning, even if same, to their knowledge, are unfounded and in fact, baseless.

Distinguished guests, your presence here is a reminder of the value of collaboration among us on the international plane. Our survival as a global community depends on the continuous trust reposed in anti-corruption institutions. The development of our economies and the global financial system is at risk from exploiters of weaknesses in the system to perpetrate financially motivated crime. However, through a co-ordinated effort, based on co-operation between criminal justice partners and the private sectors worldwide, we can conquer wrongdoers and opportunists.

Criminals exploit differences between countries to further their objectives, enrich their organisations, expand their power, and avoid detection or apprehension. The need for states to co-operate in combatting the threat of economic crimes is, therefore, more than imperative. When those who have been entrusted with authority to ensure that the right procedures are followed derelict on same, the trust and confidence of the people are abused.

We need to punish corruption and other forms of economic crime through a fair, honest and efficient justice system. As I have said before, the efficiency of a nation's justice system is tested particularly by the speed and efficiency with which cases seeking to hold high-profile members of society to account, as well as top financial crimes, are conducted.

I wish you a fruitful week as we listen to the rich insight of distinguished and accomplished speakers from around the world gathered here.

Thank you. God bless us all!

Annex 8. Ms May De Silva

Your Excellency, Conference Chair, Yeboah Dabin, the Attorney-General and Minister of Justice, ministers, senior officials and distinguished guests, all protocols observed.

In May 2017, I met a wise Ghanaian. This Ghanaian is a professor, a doctor. Today, I see myself in his country to deliver the vote of thanks. That same wise man also taught me not to mispronounce anyone's name as I have to pay him some votes, and if I do so, alas, I have no votes. So, I will refrain from going through the protocol list so eloquently announced by those who spoke before me. For those who would not guess who I'm talking about, it's of course your very own Dr Roger Koranteng. It is with great pleasure and honour that I, representing the Anti-Corruption Commission Seychelles, will on Friday be handing over the chairmanship of the Commonwealth Africa Anti-Corruption Association to the Executive Director of the Economic and Organised Crime Office, my dear sister, Maame Tiwaa Ado-Danquah.

This is quite appropriate for me because Seychelles and Ghana have familial and kinship connections. In their attempt to secure the old coast, now Ghana, for its large gold reserves in the late 1800s, the British exiled King Otumfo Nana Agyeman Prempeh 1, the Ashanti King to the Seychelles. The King was exiled regardless of the fact that he had instructed his subjects not to fight the British force when, without resistance, they captured Kumasi, the Ashanti capital.

On 11 September 1900, the 27-year-old King Prempeh arrived in Seychelles, dressed in his tribal garment of leopard skin. He was accompanied by 52 other Ghanaians, including his mother, father, brother and three wives. They remained in Seychelles for 24 years. While the Ashantis were exiled by the British, we in Seychelles were excited and happy to host the King and his delegation. This is evidenced by a farewell letter to the people of Seychelles that King Prempeh wrote 24 years later before his return to Ghana on 13 September 1924. I have appreciated the kindness of one and all in this community, he said. I shall never forget the unfailing courtesy and respect shown to me by all classes of the population. This was published in the *Viva Seychelles* newspaper.

Not everyone from the Krempe delegation returned to Ghana. Today, they are living happily in Seychelles, great-grandsons and great-granddaughters of a man who was at one time the King of Ashanti in Ghana. You know, for those of us in the anti-corruption business, we like nothing but the truth. As per the Hansard archive records of the UK Parliament debate of 14 February 1924, let it be known here today that King Krempe was held by the British for 24 years in Seychelles without any charge or trial. That's right, no charge or act of hostility was ever made against the Ashanti ruler. That, my friends, was a classical case of abuse of power.

Before I end, I wish to recognise the work of Ms Greta Fenner, the Managing Director of the Faisal Institute of Governance and the International Centre for Asset Recovery (ICAR), who died tragically in a car accident in Nairobi on 6 February. Greta was an anti-corruption champion who was well known and loved by us all in the anti-corruption global community. She has supported many of us here in our wars. For example, Martha Chizuma from Malawi Anti-Corruption Bureau, Paulus Noah from Namibia, Professor Bolaji from Nigeria ICPC and myself. The staff of Faisal Institute and ICAR continue to work in Uganda, Zimbabwe, Kenya, South Africa, Malawi and Seychelles, to name a few of our African partners. As Chair of the Commonwealth

Africa Anti-Corruption Heads Association, I wish to thank EOCO and its partners on the local organising committee, the Office of the Special Prosecutor, and CHRAIJ, and wish the people of Ghana well. I hope you all have a wonderful conference, which is packed with great speakers, country representatives and presentations, and some dinners too. Enjoy.

Annex 9. Weathering practical pitfalls in investigation and prosecution of corruption cases

Her Ladyship Serwaa Asare-Botwe (Mrs), Justice of the Court of Appeal, Ghana

Introduction

Her Ladyship defined corruption as not only the diversion of public funds for private gain but also, generally being careless or reckless with state funds resulting in financial loss as well as inchoates of conspiracy and/or abetment of these offences.

Cases

She stated that most of the cases fall within either direct fraud or indirect fraud. Direct fraud is when the culprit diverts public funds directly into his private purse. But indirect fraud is when money is lost due to a mere negligence of the culprit.

She added that corruption is very common among persons who occupy public positions. She cited some examples of cases which fall under this circumstance in Ghana.

- The Republic v Philip Assibit and Abuga Pele (Suit No. FTRM 122/14 dated 23 February 2018 (on the online portal www.dennislawgh as [2018] DLHC16331) (affirmed by the Court of Appeal in Philip Akpeena Assibit v The Republic (SUIT No. H2/23/2018 (CA) dated 13 February 2020). Available at: www.dennislawgh as [2020] DLCA8571; [https://www.dennislawgh.com/case-preview?dl_citation_no=\[2018\]DLHC16331&srb=M](https://www.dennislawgh.com/case-preview?dl_citation_no=[2018]DLHC16331&srb=M) (HC); [https://www.dennislawgh.com/case###xxx-preview?dl_citation_no=\[2020\]DLCA8571&srb=](https://www.dennislawgh.com/case###xxx-preview?dl_citation_no=[2020]DLCA8571&srb=) (CA)
- The Republic v. Sedina Christine Tamakloe Attionu & Daniel Axim (Suit No. CR/241/2019. Available at: the online portal www.dennislawgh as [2024] DLHC17436; https://www.dennislawgh.com/case-preview?dl_citation_no=%5b2024%5dDLHC17436

Practical pitfalls in investigations

Justice Afia Serwaa discussed the challenges in investigating and prosecuting corruption cases. She defined corruption and highlighted several types, including standard fraud, procurement fraud and the misuse of state funds. She emphasised that the main challenges lie in both substantive law and procedural rules. She stressed the importance of adhering not only to the substantive law but also to procedural accuracy and maintaining jurisdictional mandates. Without proper investigative procedures and evidence, these cases falter.

She stated that the practical pitfalls public officials need to be reminded of are the substantive and procedural laws. Agencies should also concentrate on procedural

correctness and to pay attention to jurisdictional mandate, not only in accordance with international legal frameworks but also domestic frameworks.

Other matters

She raised other important issues like the politics surrounding recruitments in Ghana. She advised that it should be open, transparent and the focus should not only be on academic qualifications but on integrity; that is, people with good ethics will be employed into public offices.

On qualifications and experience, officers at law enforcement agencies should train their staff or officers not only on substantive and procedural laws, but also on the essence of good ethics.

Her final issue concerned the condition of service of anti-corruption agencies. That is, they ought to be given good conditions of service such as to make the thought of corruption unattractive and to make it difficult for others to poach their officers.

Annex 10. Anti-corruption drive: changing the narrative

Olanipekun Olukoyede, Economic and Financial Crimes Commission, Nigeria

Introduction

The Economic and Financial Crimes Commission (EFCC, 'the Commission') was established in 2002 by an Act of the National Assembly and subsequently repealed by the EFCC Establishment Act of 2004. The Commission is charged with the responsibility of enforcing the provisions of all economic and financial crimes laws in Nigeria. President Bola Ahmed Tinubu on 12 October 2023, appointed Mr Ola Olukoyede as the Executive Chairman of the EFCC.

Engagements

Preventive measures

The creation of an Anti-Corruption Clubs in Schools: The EFCC has initiated an Anti-Corruption model that targets children and youth from formative stages. It has created Anti-Corruption Clubs in about 200 primary, secondary and tertiary institutions across the country, as well as at the National Youth Service Corps.

The second preventive measure is the faith-based approach. It has launched a faith-based manual on anti-corruption, which leverages religious principles and values to educate the populace on the ills of corruption.

A third preventative measure is a fraud risk assessment and control, a model for early discovery or suspicion of fraud in contract and procurement processes. These models include the following.

Preventing forex malpractices – proactive measures and controls:

- Action taken: Frozen over 1,000 illegal forex trading accounts on P2P platforms.
- Reason: Accounts linked to forex manipulation and significant financial misconduct.
- Impact: Prevented further volatility and devaluation of the naira and averted a potential crash in the forex market.
- Additional measures: Crackdown on illegal cryptocurrency exchanges.
- Goal: Stabilise Nigeria's economy and protect the naira.

Tackling dollar racketeers:

- Action taken: Established a special task force across 14 zonal commands to tackle dollar racketeers.
- Reason: To address the steep decline in the value of the naira and curb practices contributing to currency devaluation.

- Impact: Targeted speculative forex trading and reduced illicit practices in dollar transactions, leading to improved forex stability.
- Additional measures: Investigated and summoned private universities and schools charging tuition in dollars, focusing on institutions contributing to dollar pressure.
- Goal: To reduce pressure on the naira, curb dollar racketeering and support the stabilisation of the Nigerian economy.

Investigation and prosecution

The database for investigation and prosecution shows the following: petitions investigated – 3,593; cases filed – 2,061; convictions – 1,816; civil cases – 401.

Post-conviction reorientation

This seeks to educate ex-convicts on the effects of their actions; that is, not leaving ex-convicts to their fate. This involves teaching them about the reasons why they should desist from committing crime and focus on developing their potentials to become better people in society.

Technological initiatives

The creation of the Eagle Eye App: This application aids whistle-blowing by allowing individuals to report instances of corruption anonymously. It has greatly helped the Commission in gathering huge intelligence about corrupt Nigerians within and outside the country.

The case management application: The EFCC understands that technology plays a critical role in anti-corruption through automation of processes. Hence the EFCC has developed the in-house Eagle Case Management System that is designed to track each case from inception to its conclusion.

The digital archive: the EFCC has implemented a digital archival solution, which is aimed at providing an electronic document management and archiving system (EDMS) for the Commission.

The creation of a forensic laboratory: The major focal areas of expertise include digital forensics; forensic document examination; fingerprint/crime scene management; forensic audio, video and amp; image analysis, as well as the forensic chemistry section.

Annex 11. Tech tools for combatting corruption in the health sector in Tanzania

Prevention and Combatting Corruption Bureau, Tanzania

Introduction

The Prevention and Combating of Corruption Bureau (PCCB) is a law enforcement agency established under Section 5 of the Prevention and Combating of Corruption Act (PCCA), Cap. 329 RE 2022. It is the leading anti-corruption agency in Tanzania, which has generated different and visible strategies in preventing and making enforcement against corruption through its core functions.

Health is one of the largest industries in terms of the number of customers it affects every day. It is complex, difficult and paper based. The national budget allocated to this agency is, FY2022/23: 2.1 trillion Tanzanian shillings (TSh) (5.1 per cent); and FY2023/24: 2.4 trillion Tanzanian shillings (5 per cent).

It is vulnerable to corruption and embezzlement, given its significant allocation from the national budget. Abuse of privileges and misuse of resources may lead to inappropriate and ineffective care that may hinder the government from achieving its intended goals in the provision of health services.

To enhance service delivery, data collection, and prevent and mitigate corrupt practices in service delivery, PO-RALG, GOT-HOMIS (1,846 hospitals), Ministry of Health (MoH), AFYACARE (24 regional referral hospitals), e-HMS (4 regional referral hospitals). It is important to note that, since the early 2000s, the Government of Tanzania (GoT) has introduced Management Information Systems (MIS) in the healthcare sector.

Prevention of corruption in the public sector

As part of the strategies to prevent corruption, e-government initiatives were created to improve transparency and mitigate the likelihood of corrupt practices. It is important to note that, the PCCA Cap 329 RE 2022 empowers the PCCB with responsibilities of preventing and combatting corruption in Tanzania.

PCCB has collaborated with UNDP to develop a technological tool for combatting corruption in the health sector. This has been implemented in 20 hospitals so far. These hospitals fall under MoH and PO-RALG. Data were extracted from, specifically, the medical stores department, 11 district and 9 regional referral hospitals (Mwanza, Dar es Salaam, Iringa, Mbeya, Tanga, Kilimanjaro, Geita, Kagera and Tabora). The major aim of this initiative is to be able to detect corruption at its early stages, to prevent corruption activities and to improve transparency and accountability.

PCCB has utilised digital forensics and big data analytics tools. These tools include Audit Command Language (ACL) software used for data extraction; forensic images created using Exterro FTK Imager software; digital forensics write blockers deployed to uphold data integrity; hash values generated using MD5 and SHA1 hash algorithms; data protection measures; encryption of data to safeguard patient medical records; and preservation of privacy and integrity (given the sensitive nature of patient information).

Results

Corruption risks were detected and mitigated, corruption and other offences were detected for further investigation, revenue was collected via GePG, and awareness raising was carried out.

On corruption prevention, the exercise identified opportunities for improvements in the e-health management information systems, aimed at enhancing efficiency and transparency in medical fee collections, proper procedures for discounts and exemption issuance, strengthening user credential management, addressing the presence of fictitious user accounts, implementing timely reconciliation processes, and aligning services with appropriate payments.

Challenges faced in implementing the project

Challenges include the lack of standardisation and uniformity, the high cost for implementing the project, inadequate network infrastructure, and reluctance on the part of health workers to provide data.

Recommendation

The widespread use of digital technology makes it essential for ACAs to leverage these tools effectively in combatting corruption by evaluating their technological competencies and preparedness to tackle corruption in this evolving landscape.

By doing so, they can ensure that they are equipped to gather and safeguard evidence in line with legal requirements, enhancing their effectiveness in investigating and prosecuting corruption cases.

Annex 12. Strengthening institutions and promoting transparency

Directorate on Corruption and Economic Offences (DCEO), Lesotho

1. Introduction

Lesotho – over the past 20 years – has not performed well against corruption, largely because of a lack of demonstrated political will insofar as capacitating relevant institutions is concerned.

2. The current position in the fight against corruption

Its Directorate has entered into a memorandum of understanding with all key law enforcement and oversight institutions to foster greater co-operation and collaboration in fighting corruption.

Also, in the last financial year alone, the Directorate on Corruption and Economic Offences (DCEO) put before court a total of 48 cases. Most of these cases involve huge sums of money, including other forms of assets, especially those in the form of vehicles and buildings recovered, including from outside the borders of Lesotho.

Under its prevention programme, the Directorate has been able to revive anti-corruption structures in various sectors, such as systems integrity committees within government ministries and departments, district anti-corruption committees, youth anti-corruption structures in business, sport and religion, and students integrity associations in selected schools.

3. The way forward

The DCEO has developed an omnibus bill with clear proposals to, among others, elevate the Directorate to become an anti-corruption commission, and have the Commission established under the Constitution of Lesotho. This should better enhance the independence of the agency.

It is also looking at investing more in technical skills capacity building of officers across all functions in terms of the mandate of the office.

4. Main challenges

Political instability has characterised the country since the inception of coalition governments in 2012. This has impeded the fight against corruption.

In addition, institutions can be highly compromised not only politically but even morally, thus losing public confidence. The DCEO has had to arrest some of its own officers for indulging in acts of corruption.

5. Recommendation

Institutions must find a way of building both internal and external mechanisms for resilience and sustainability. This will prepare them for extra shocks in future.

Annex 13. Strengthening institutions and promoting transparency: a means of fighting corruption in Commonwealth Africa

May De Silva, Commissioner, Anti-Corruption, Seychelles

Piracy

In her introduction, May De Silva stated that one of the major problem Seychelles is facing or has always faced is piracy. That is, domestic fishing has been devastated and, as a result, the informal levy system turned to piracy. These issues were more prevalent in the early 2000s, specifically in the year 2009. In this particular year, Seychelles experienced 200 attacks, 68 successful hijackings and demands for US\$50 million (£32 million) in ransoms. The commissioner stated that they had organised co-ordinated responses to piracy, including a combined task force and a maritime security patrol area. In addition, it ended the catch and release policy, undertook better evidence gathering, took on domestic prosecutions, had better policies in place, employed UK barristers to conduct trials, and had more robust prison sentences.

Drugs

The drugs problems include vast porous and unchecked borders, social problems, the world's worst heroin addiction, increasing crime rates, impacting on children, prosperity, and tourism. Prisons are overcrowded.

The commissioner added that they had organised co-ordinated responses, which included the implementation of a high-level strategy, a multi-agency joined-up approach, drug community programmes, drug courts and community sentencing. In addition, there needs to be a prison response. Faith communities could also become involved, while supply chains should be disrupted and there needs to be more robust sentences for dealers.

Addressing the challenges

In addressing the issues that have hit Seychelles in the recent years, the agency has succeeded in making legislative changes and increasing resources. It has arrested criminals, improved domestic co-ordination and signed memoranda of understanding (MoUs). It has also improved international co-operation, with the IACCC, UK, US, ICAR and the African Union's (AU's) task force. There is a public belief in change, with robust prosecutions ongoing and convictions starting.

Domestic co-operation

In terms of domestic co-operation, the commissioner stated that they have started collaborating with law enforcement agencies and prosecution offices in addition to numerous international law enforcement agencies and financial intelligence units (FIUs), international experts, and digital forensics kit.

Addressing the challenges – the Commonwealth perspective

In addressing the challenges, the commissioner stated that the Commonwealth Anti-Corruption Heads Grouping, MOUs, British common law, the sharing of resources and intelligence, and the provision of internship opportunities will continue to help in the fight against corruption. This will be supported by legal reforms.

She concluded by saying that co-operation and collaboration are key to fighting corruption.

Annex 14. Institutional empowerment: a path to independence, effectiveness, transparency and accountability

**Samuel Bwana, Manager, Strategy and Operations,
Integrity Vice Presidency, The World Bank Group**

'Empowerment' refers to the granting of power, rights and authority to perform various acts or duties. According to the Merriam-Webster dictionary, it involves strengthening, supporting, and enabling institutions or individuals to become more efficient, competent and influential. Empowerment can take many forms, such as providing technical assistance through monetary resources, assets, premises, equipment or personnel. It may also include the development of research, strategies and action plans, as well as the dissemination of knowledge through training and public education. Collaboration, mutual agreements and information exchange are additional means of empowerment, alongside publicity, exposure and certain privileges like access to resources or systems. Empowerment can be requested, offered or even rejected by the recipient.

Empowerment plays a vital role in supporting technical and managerial capabilities, fostering leadership that is both competent and dynamic. It strengthens institutional resilience by enabling organisations to operate efficiently on their own and improves the broader environment – political, economic and social – in which institutions function. In some cases, empowerment facilitates strategic reorganisation, triggering efficiency through reforms, as seen in Mauritius. It also fosters international co-operation, institutional collaboration and inter-agency partnerships. Moreover, empowerment enhances the legal and regulatory framework that governs institutional operations, though this is often challenging.

Legal and regulatory frameworks are critical to ensuring independence and effectiveness. These frameworks require progressive legislation that guarantees independence, security of tenure for leaders, and unambiguous mandates with clear processes. They also provide immunity to shield leadership and employees from undue civil or criminal proceedings related to their duties. However, achieving these goals often hinges on political will, which can be a significant challenge.

Political will is essential for driving institutional empowerment and reform. As Al Gore aptly said, 'Political will is a renewable resource, and everyone can have it in abundance if they so choose.' Empowerment is also supported by various sources, including government funding and operational support, media publicity and exposure, donor contributions, private sector partnerships, local community engagement, and mutual growth through peer institutions. Civil society plays a crucial role by providing checks and balances, holding governments accountable, and preventing abuse of power.

While absolute institutional independence does not exist due to the inherent reliance on the state or government, autonomy is a critical goal. Autonomy ensures operational self-sufficiency and builds public confidence through financial independence, self-managed budgets, and transparent resource and recruitment processes. Institutions with autonomous systems can appoint leaders based on neutrality, impartiality, integrity and competence.

Effectiveness is achieved through the consistent application of rules and regulations, transparent decision-making, and fair procedures for appointing and removing leaders. Institutions that maintain transparency in resource management and internal controls are better equipped to serve their objectives.

Accountability is strengthened when institutions engage in regular public reporting and performance reviews, communicate effectively with the public, and maintain mechanisms to hold officials responsible for their actions. Transparency fosters trust and adherence to principles of the rule of law and human rights, while ensuring public access to institutional information.

Although absolute independence is unattainable, operational autonomy and immunity are essential for ensuring institutions remain effective and accountable. By protecting staff from undue interference, institutions can focus on fulfilling their mandates with integrity and competence.

Thank you!

Annex 15. International asset recovery: challenges and solutions

**Simon Marsh, Head, Southern and Eastern Africa
International Centre for Assets Recovery, Kenya**

This presentation explores global asset recovery efforts, addressing the challenges faced, potential solutions and innovative approaches to improving outcomes.

One of the key challenges is the issue of beneficial ownership. The ease of concealing ownership through complex corporate structures creates significant obstacles, particularly in jurisdictions where enforcement mechanisms or resources are lacking. Mutual legal assistance frameworks further complicate matters. These outdated systems often lead to delays in obtaining critical evidence, with additional burdens like certified translations and diplomatic transmissions adding to the inefficiency.

International financial centres (IFCs) also present evolving challenges. Their practices can hinder the collection of evidence and impede asset recovery processes. Intelligence gathering, another critical component, is often underdeveloped compared to other areas such as counterterrorism. This lack of effective intelligence diminishes the ability to track and recover assets.

The rise of cryptocurrencies and virtual currencies introduces unique challenges. Misconceptions about their use and unregulated exchanges make investigations particularly difficult. Additionally, poor management of restrained or preserved assets often results in depreciation and loss of value, further complicating recovery efforts.

Proposed solutions emphasise leveraging technology and fostering international collaboration. Open-source intelligence (OSINT) tools, including facial recognition, data tracking and vessel monitoring, can provide actionable insights to aid investigations. Strengthening international co-operation through mechanisms like Interpol and networks such as the International Anti-Corruption Coordination Centre (IACCC) and the Egmont Group is another critical step.

Blockchain transparency is also key. Training investigators to effectively analyse crypto transactions can help overcome challenges associated with virtual currencies. Asset management practices, such as early asset disposal and the use of interest-bearing accounts, are recommended to mitigate value loss.

Training opportunities were highlighted as essential to building capacity in this field. Basel eLearning courses provide valuable resources on financial analysis, mutual legal assistance and intelligence gathering. The Basel AML Index serves as a risk assessment and ranking tool for efforts related to anti-money laundering (AML) and countering the financing of terrorism (CFT).

This comprehensive approach underscores the importance of innovation, collaboration and continuous learning in tackling the complexities of global asset recovery. The success of asset recovery depends on collaboration, capacity building, and adopting modern tools and practices.

Day 2

Annex 16. Lessons and challenges from the Commonwealth Caribbean in the fight against corruption

Julian Johnson, former Chairman, Integrity Commission, Dominica

1. Introduction

I thank the Commonwealth Secretariat for inviting me to this important meeting. In this forum, I must also recognise the work and efforts of Dr Roger Koranteng, Head, Public Sector Governance, Governance and Peace Directorate at the Commonwealth Secretariat. I thank him for his sterling contribution to good governance and for his assistance, advice, commitment and support in confronting the challenges of anti-corruption administration in the very small states of the Commonwealth Caribbean: this includes his outstanding work in the formation of the Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies (CCAICACB) in 2015 and the publication of *Combating Corruption in the Commonwealth Caribbean* (2022), which he edited. My attendance at this the 14th Commonwealth Regional Conference of Heads of Anti-Corruption Agencies in Africa suggests the 6th Annual Conference held in Swakopmund, Namibia eight years ago. At that conference, the feature address was delivered by a great inspiring Pan-African leader and statesman who died three months ago – the late President of Namibia, Dr Hage Geingob, of blessed memory.

'Transparency starts at the top'

In my presentation at the Sixth Conference, I commended President Dr Geingob for the voluntary public declaration of his assets and that of his wife when he took up office in 2015. In his address, he informed the conference that this voluntary public declaration of assets was made because he believed that 'transparency starts at the top'. Recognising that corruption must not be treated as peripheral to the question of development he stated that he was 'deeply convinced that accountability and transparency is important for shared, inclusive and sustained economic development which is required for poverty eradication'. He emphasised that anti-corruption bodies must continue 'to aggressively and fearlessly pursue their statutory duties and build reputable agencies' (*Repeat*). And he added: 'A well-liked popular anti-corruption agency would make me unhappy as the very nature of your mandate should automatically disqualify you from winning any popularity contest' (*Repeat*).

The reasons for this decision of the President of Namibia found resonance with the Former Integrity Commission of the Commonwealth of Dominica ('the Commission'), which at the time was robustly engaged in judicial review proceedings before the OECS Court of Appeal. At issue in *The Integrity Commission v Attorney-General of Dominica* was the Commission's decision to comply with the mandatory provisions of the Integrity in Public Office Act, 2023, dealing with the sanctions and reporting procedures for the failure to file a declaration of assets by a person in public life who was subsequently appointed Head of State, during his mandatory filing period.

One of the grounds advanced by the Attorney-General was that the publication of the fact of non-compliance in the Official Gazette and the submission of a report to the Director of Public Prosecutions would undermine the constitutional immunity and personal dignity attached to the Office of President!

2. The Commonwealth Caribbean

(i) Geographical area

The Caribbean archipelago from Belize in Central America to Guyana in South America includes the independent island states of Trinidad and Tobago, Grenada, St Vincent and the Grenadines, Barbados, Saint Lucia, Dominica, Antigua, St Kitts and Nevis, Jamaica, The Bahamas, and the British territories of Montserrat, British Virgin Islands, Cayman Islands, Bermuda, and the Turks and Caicos Islands.

(ii) Westminster-Whitehall Model constitutions

The Commonwealth Caribbean countries which experienced British colonial rule and legal system adopted at independence constitutions that embodied a democratic parliamentary system of government drawn from Westminster 'stock' – the Westminster-Whitehall Model. Under this model, British constitutional principles and conventions were codified in the constitutions. These included the rule of law, the separation of powers doctrine and the accountability of the executive to parliament – the cabinet collectively and the ministers individually.

It also enshrined a public service conceived as a neutral, loyal service to governments in succession, and insulated from political control by an autonomous Public Service Commission whose constitutional purpose is to 'insulate members of the public service from political influence exercised directly upon them by the Government of the day'.

(iii) Sociology/political economy of very small states

- In small island developing states (SIDS) like those found in the Commonwealth Caribbean, the personalised and multiplex nature of human relationships makes it extremely difficult for partiality to be absent. In these states, it is impractical to separate personality from function. It is difficult to maintain anonymity. All members of the public are a kind of extended family; network of influence extends everywhere. Public officials must operate professionally within a hierarchy of people with whom they are unavoidably personally acquainted, related or otherwise connected in a non-work environment.
- A substantive feature of the political system in these states is what the late Professor Carl Stone has characterised as 'patron-clientelism', that is, the exchange of economic and social favours to a poor and socially fragmented population in return for party support. Political leaders harness the state as a resource from which to establish a power structure that competes with

and parallels the power structure rooted in the ownership of the factors of production, distribution and exchange. This has caused the ascendancy of the 'Political Kingdom' to be almost complete.

- The ubiquity of politics and the emerging 'one party' rulership: 'In a small island of 50,000–100,000 people, dominated by a single political party, it is very difficult to prevent political abuse. Everybody depends on the government for something, however small, so that most are reluctant to offend it. The civil servant lives in fear, police avoid unpleasanties, the trade unions are tied to the party, and the newspaper depends on government for advertisements and so on.'

It is in this environment, it is with these realities and constraints that the integrity commissions and other anti-corruption bodies in the very small states of the Commonwealth Caribbean are required to exercise their autonomous anti-corruption jurisdiction over the mighty elected and appointed executive, members of parliament, heads of departments of government and other senior public and police officers, managing directors and chairmen of statutory corporations, who constitute the list of 'persons in public life' in the respective legislation.

3. The anti-corruption initiatives in the Commonwealth Caribbean

There are three broad categories of anti-corruption legislation:

- Those that have codified the criminal law and have reproduced in their codes the common law rules on bribery and misconduct in public office – Belize (Criminal Code, Rev. ed. 2000 – Chapter 101) and The Bahamas (Penal Code 1873 – Chapter 84).
- Those that have replication of the late nineteenth century and early twentieth century UK anti-corruption legislation: The Bahamas (Prevention of Bribery Act 1976); Barbados (Prevention of Corruption Act 1927, Chapter 144); and Belize (Prevention of Corruption Act 1927, Rev. Ed. 2000 Chapter 105).
- Those that have a series of modern legislation beginning in the 1970s with the Integrity in Public Life Legislation and including initiatives promoted by the Inter-American Convention Against Corruption and UNCAC: Guyana – Integrity Commission Act 1997 (Cap 19:12); Trinidad and Tobago – Integrity in Public Life Act 2000, as amended; Antigua – Integrity in Public Life Act 2004 and Prevention of Corruption Act 2004; Saint Lucia – Integrity in Public Life Act 2004; Dominica – Integrity in Public Office Act 2003 and Integrity in Public Office (Amendment) Act, 2015; Jamaica – Parliament (Integrity of Members) Act 1973 and Contractor – General Act 1983 and Contractor – General (Amendment) Act 1999; Belize – Prevention of Corruption in Public Life Act 1994; Grenada – Integrity in Public Life Act 2004 and Prevention of Corruption Act 2007; and Montserrat – Integrity in Public Life Act 2004.

These commissions established under the integrity legislation are required to submit annual reports to parliament on their activities through the responsible minister.

In addition to these Integrity in Public Life and the Prevention of Corruption legislations, the anti-corruption regime includes Audit Acts; Anti-Money Laundering Terrorist Financing Codes, Finance (Administrative) Acts, Finance Intelligence Unit Acts, Money Laundering (Prevention) Acts, Proceeds of Crime Acts, and Public Procurement and Contract Administration Acts.

4. Lessons and challenges

Combatting Corruption in The Commonwealth Caribbean, edited by Dr Roger Koranteng and published by the Commonwealth Secretariat in 2022, examined the specific factors including the legal regime and institutions that have contributed to the reduction of the impact of corruption in six very small island-state countries in the Commonwealth Caribbean. That is – The Bahamas, Barbados, Dominica, Grenada, Saint Lucia and St Vincent and the Grenadines. These countries were selected because they have registered strong scores or have registered significant improvement in their scores on the Transparency International Corruption Index (CPI) over the decade 2010–2020.

The study details the constitutional and statutory regime dealing with anti-corruption and the jurisdiction and functions of oversight bodies in these island states and identifies the factors and institutions that have impacted on corruption and the lessons learnt and challenges confronted by these very small states. I have included some of findings of this book as follows.

- While the commission has continued to be provided with adequate financial resources to carry out its operations (including supplementary resources for legal expenses), administratively the autonomy of the institution is being threatened in the appointment, management and disciplining of staff, the inadequate physical accommodation (its meeting place), the travelling of its commissioners and staff, and the submission of its report for tabling in parliament by the minister.
- The enforcement of the provisions of the Integrity Act has been hampered by inadequate support in prosecuting those in breach of its provisions to the extent that a number of cases have either not been heard or have been discontinued or dismissed.
- Failure of the relevant authority to submit its annual report to parliament has affected its accountability obligations and the effectiveness of its reporting on certain vital issues affecting its operations.
- Public support is still lacking, either because of misunderstanding of the role and authority of the commission or the deep divide in political communities where communities remain dissatisfied with actions taken by the commission from the perspective of party interest. Nor is the commission itself unaffected by this divide between communities and it is apparent that groupings have formed based on political persuasions.
- The failure of some parliamentarians to disclose their assets, income and liabilities with no criminal sanction imposed.
- Lack of institutional capacity in the police service to tackle corruption with the Financial Crime Investigation Unit lacking expertise and human resources.
- As a trans-shipment point for narcotics, some of the islands are affected by the international narcotic market, while the laundering of money made outside the country is a major issue. The presence of an unknown number of offshore financial institutions with no published beneficial ownership heightens the risk.
- No political finance legislation to regulate political party and election campaign financing to address electoral corruption.

- Inadequate high-level management and suitably qualified professional staff with loyalty to the oversight body and its mandate, that is, committed to the statutory purpose of establishing probity, integrity and accountability among high level state functionaries.
- Enforcement of executive accountability to parliament, the reporting duty of oversight bodies and parliament's role as the apex oversight body.
- In small islands, decisions in the economic, political and legal fields have a pervasiveness that they lack in larger societies. This is because people are connected to each other in many ways in small societies, and one cannot progress very far occupationally or professionally without coming into contact with the government.
- There has been a long tradition of integrity and professionalism in the public service, mainly due to a supportive legal framework and careful selection and training of public servants. Government has strengthened provision for accountability and transparency in its legislation for audit, finance administration and prevention of money laundering.
- Recent experience has shown that legislation and institutional frameworks must be regularly reviewed and strengthened to allow for enhanced autonomy for and parliamentary oversight of constitutional and statutory oversight bodies.
- Improvements in the legislative framework and enhancements to administrative procedures are not sufficient to sustain anti-corruption policies. Constant parliamentary oversight, bolstered by the operations of well-ordered and co-ordinated oversight bodies, is the most effective bulwark against corruption in all its forms.
- Governments should increase the level of transparency in the management of public finances. With strong political will, a country with a high level of corruption can be transformed to a low-corruption country.
- Countries within the Commonwealth Caribbean must make it a priority to instil values of discipline, law and order from a tender age. These values should be inculcated through the school system, religious institutions and the family structure.
- Integrity commissions and anti-corruption bodies should be staffed by persons who are suitably qualified and possess the necessary experience and capacity to perform the high statutory purpose of advancing probity, integrity and accountability over powerful and high-level state functionaries.
- Governments should enact effective political campaign finance legislation to ensure that political parties frequently report their finances, including all donations received and expenditures, to an independent election authority. Additionally, they should establish a cap on political campaign spending to limit the influence that money has during elections.
- A well-functioning anti-corruption framework is dependent on 'whole-of-government' cross-organisational collaboration and a high degree of professionalism among the responsible public officials.

5. Practitioner's recommendations for strengthening oversight

In its seminal publication in 2021 on the Commonwealth benchmarks of good anti-corruption practice for national governments and public sector bodies, the Secretariat pointed out that although over the past 25 years significant national and international action has been taken to help prevent and address corruption, nevertheless, 'the existing anti-corruption mechanisms still do not consistently and effectively discourage, prevent, detect or prosecute corruption. In all countries, to a greater or lesser extent, corruption continues to erode all areas of society'.

Also, John Githongo, whose story of his fight against corruption is told in Michele Wrong's book: *It's Our Turn to Eat: The Story of a Kenyan Whistle Blower* (2009), published an article on the 23 February 2024 entitled 'Thirty years of anti-corruption'. This was a personal reflection in which he lamented the fact that in 2024, the underlying assumption to successful anti-corruption work – including independent governance institutions, greater transparency and accountability in public life – can no longer be taken for granted. (*The Elephant*: www.theelephant.info 23 February 2024).

And, in a recent article by International IDEA on independence in electoral management, it was emphasised that while electoral management bodies (EMBs) are exposed to the possibility of undue influence and/or manipulation by political or other groups, they must perform their functions in an apolitical manner, exercising fearless independence from the government to uphold the principle of impartiality. EMBs require a conducive and comprehensive legal and institutional framework and an adequate transparent accountability mechanism to uphold their independence and autonomy. [Joseph, O (2021), 'Independence in Electoral Management Electoral Process', International Idea Institute of Democracy and Electoral Assistance].

This assessment applies to anti-corruption bodies as well.

6. Recommendations for strengthening constitutional and statutory anti-corruption bodies oversight

Because of the importance of the independence of some oversight institutions to the fabric of our parliamentary system of democracy, the constitution deeply entrenched the establishment and prescribed the personnel of the oversight bodies. These included the constituency boundaries commission and the electoral commission. The members of these bodies are political appointees placed there on the advice of the executive and the leader of the opposition. This provides a fruitful source for the dispensation of patronage and potential political abuse. Impartiality, institutional independence and accountability may be trumped by other considerations in the making of such important appointments.

The conduct and decision-making process of one such body fell to be considered by the Eastern Caribbean Supreme Court in the *Constituency Boundaries Commission and the Attorney-General v Urban Baron* (10 May 1999). Here six constituencies recommended in the Commission's report for alteration were constituencies not represented by any Member of the Parliament on the government side.

The Supreme Court found that all members of the Commission had 'strong political and personal ties and/or affiliation with their respective political parties'. In declaring the report illegal on the grounds, inter alia, of bias, the court opined that 'the whole exercise by the Commission was deliberately engineered so as to favour one political

party over another'. It was an imposition of the paramountcy of the government's party, of its political will on the Commission.... 'such an imposition is completely alien and repugnant to the Constitution and will have to be rejected as an insidious contravention of the Constitution'.

The Court of Appeal added: 'The reality of the situation is that when such a Commission is being set up, the respective sides will recommend members whom they are satisfied will look after such sides respective interest. Their concentration will be more on political advantage than constitutional requirement'.

In my view, for such constitutional or statutory oversight bodies to be endowed with the capability to perform their pivotal functions with independence and impartiality, there must be careful selection of their members from professional and experienced person of high public standing and reputation for integrity and who are not known to have strong and active political affiliations.

Include civil society members on commission

In his report of November 2022 and the submission of a Draft Bill for The Electoral Commission Act 2023, to the Government of Dominica, Sir Dennis Byron referred to one of the important challenges posed by the current electoral system of Dominica, that is the: 'Autonomy of the Electoral Office which should operate with a level of independence from the executive of government and should be equipped with the requisite human resources and capacity'.

In seeking to address the current narrow base of the Commission's membership, the Draft Bill provides that the objective of the Electoral Commission is to safeguard the democratic foundation of the state by managing the registration and conduct of elections in a free, fair, independent, transparent and impartial manner.

The Draft Bill, therefore, prescribes eligibility criteria for the appointment of the five members of the Electoral Commission to include 'two members representing the interest of civil society being person drawn from academia, the private sector or the organisation representing religious bodies and at least one woman'. It should be noted that the Draft Bill introduces considerations regarding the composition of the membership of the Dominica's Electoral Commission on which the Constitution of Dominica is silent. Kenya and Nigeria laws contain comparable provisions. (Kenya: Independent Electoral and Boundaries Commission Act, Chap. 7C, Laws of Kenya Revised Edition, 2023; and Nigeria: Independent National Electoral Commission Decree (INECD) No.17 of 1998, Laws of the Federation of Nigeria). I endorse this provision in the Draft Bill, which in my view should apply to all institutional oversight bodies.

Laying in parliament of reports of oversight bodies

The doctrine of ministerial responsibility to parliament is a central feature of our Westminster Model Constitution. Under the constitution and by statute, oversight bodies are required to submit annual reports to parliament detailing their activities, accompanied by audited accounts. The list of such institutions in the Commonwealth of Dominica exceeds a dozen. A browse through the Hansard and Minutes of the House of Assembly shows scant reference to any of these reports, either in questions, motions, statements or speeches before the House of Assembly. Many reports are not submitted. There is inordinate delay and contravention of mandatory statutory provisions in dealing with reports for laying in parliament by responsible ministers.

(1) Minister must table report

The Dominica Air and Sea Ports Authority Act of 2006 provides that the minister shall cause a copy of the report together with the copy of the audited statement of the accounts and the auditor's report thereon to be laid on the table of the House of Assembly at the next sitting following the receipt of the report. This provision should be universalised in respect of all anti-corruption bodies.

Periodic review by committee of parliament

(2) There should be included provisions in anti-corruption acts that require the responsible minister to carry out independent review of the operation and effectiveness of the acts as soon as possible after the expiration of three years from the commencement and from time to time thereafter. Jamaica's anti-corruption laws make provision for such reviews. These laws include: (1) The Integrity Act 2017; (2) The Protected Disclosure Act 2011; and (3) The Corruption Prevention Act 2001.

(3) A standing select committee of parliament should be established under the Standing Orders of the House of Assembly to examine the annual reports of the anti-corruption bodies and to report on the performance of their functions and the implementation of any recommendations contained therein, subject, of course, to the bodies autonomous jurisdiction under the enabling act.

Establishment and appointment of anti-corruption bodies

In terms of autonomy and staff, I recommend that provisions of the Draft Bill for Electoral Commission Act 2023, annexed to the Report on Electoral Reform, Commonwealth of Dominica, Phase 2 – June 2023 by Sir Dennis Byron, be considered for inclusion in the anti-corruption legislation of member countries. (See Section 3(2) with First Schedule para 2(2) and para 3(3)(b)). Also, I recommend that the provision of Section 4 of the Integrity in Public Office Act 2003 of Dominica provides an appropriate template for the establishment of an independent and impartial oversight body.

Section 4(1) of the Act of 2003 enacts as follows:

- '4(1) There is hereby established an Integrity Commission consisting of*
- (a) a Chairman, who shall be a former Judge of the High Court, an Attorney-at-law of fifteen years standing at the Bar or a former Chief Magistrate, appointed by the President on the advice of the Prime Minister*
 - (b) two members appointed by the President on the advice of the Prime Minister.*
 - (c) two members appointed by the President on the advice of the Leader of Opposition.*
 - (d) a chartered or certified accountant appointed by the President on the recommendation of the Institute of Chartered Accountants of Dominica or like body however described.*
 - (e) an attorney-at-law appointed by the President on the recommendation of the Dominica Bar Association.*
- (2) The Prime Minister shall consult with the Leader of the opposition before tendering any advice under subsection (1)(a).*
- (3) Members appointed pursuant to subsection (1)(b) and (c) shall be persons of high public standing and reputation for person integrity'.*

The Former Commission appointed under Section 4 of the Act of 2003 in its annual reports 2008–2015 provides details of its activities in performing its independent statutory functions. The activities of the Commission under the Acts of 2003, as amended by the Integrity in Public Office (Amendment) Act, 2015, are contained in

its 2016–2020 annual reports. The majority decision of the successor Commission, taken on the 12 February 2021, allowing a person in public life (the Prime Minister) to keep a personal gift of a motor vehicle valued at 194,000 Eastern Caribbean dollars (EC\$) from a businessperson who admired him and was impressed by the way he governed his country, is presently before the Court. The leader of the opposition's appointed member has applied for judicial review of this decision (by the executive-appointed majority: *Cara Shillingford v The Integrity Commission (2021)*).

Staff of the Electoral Commission

Integrity commissions and anti-corruption bodies should be staffed by persons who are suitably qualified and possess the necessary experience and capacity to perform the high statutory purpose of advancing probity, integrity and accountability over powerful and high-level state function.

At a Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies meeting in Grenada in 2015, the distinguished and renowned counter-corruption expert Dr Edward Hoseah of Tanzania warned anti-corruption bodies that staff members of these institutions should be monitored to ensure that they themselves do not become victims of corruption. He pointed out that like any other human institution, anti-corruption bodies are vulnerable to manipulation and corruption and this is where the challenges of staff conduct can become compromising to the institution. As he said, 'Not all staff will be angels; some will exploit, so you need to look internally to ensure that staff members remain conscious of their and the institutions credibility. They should be watched internally and externally.'

Indeed, anti-corruption bodies face political interference that seeks to neutralise and weaken their functions. They need to watch out for 'internal fault lines' and introduce staff codes of conduct.

Article 36 of UNCAC, in seeking to guarantee the independence of anti-corruption bodies, emphasises that such bodies must be empowered to employ staff and provide specialised training.

I have found Section 7 of the Belize Prevention of Corruption Act 2001, concerning the Secretariat and its accountability to the Commission, to provide good precedent to be included in the legislation of other anti-corruption bodies:

'Section 7(1) There is established for the purposes of this Act, a Secretariat to the Commission which shall consist of the following persons

- (a) an Executive Director;*
- (b) an Administrative Secretary;*
- (c) a senior Clerk;*
- (d) an in-house legal Adviser;*
- (e) a Special (forensic) Investigator who is highly skilled and experienced to conduct investigations relating to financial crimes; and*
- (f) any other personnel reasonably necessary to carry out the Functions of the Commission.*

(2) The Executive Director is accountable and answerable to the Commission, and he shall carry out all directions given to him by the Commission in pursuance of its functions.

(3) The Office of the Secretariat is charged with the administrative responsibilities of the Commission and shall perform any duties reasonably incidental to the office of the Commission, and which are assigned to it by the Commission.'

7. Conclusion

And so, the late President Dr Hage Geingob must be turning and spinning in his grave on receiving the report that a Caribbean anti-corruption body which 'fearlessly pursued its autonomous statutory duties', consonant with his advice, was abolished by its parliament and replaced by a successor commission, the majority of the members of which were appointed by the sitting Prime Minister and who dutifully decided that there was not sufficient evidence justify the statutory inquiry began by the former Integrity Commission into a complaint of breach of the Code of Conduct. Maybe not. He must be smiling happily saying I would be unhappy if you had done otherwise!

Mr Chair, ladies and gentlemen. Thank you.

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Annex 17. GlobE Network of Anti-Corruption Law Enforcement Authorities

**Kodjo Attisso, Corruption and Economic Crime Branch,
United Nations Office on Drugs and Crime, Austria**

Introduction

The aim of the GlobE Network ('the Network') is to provide a quick, agile and efficient tool for facilitating transnational co-operation in combatting corruption, strengthening communication exchange and peer learning between anti-corruption law enforcement authorities, while complementing and co-ordinating with relevant international cooperation platforms (GlobE Charter).

Structure

The first body is the Steering Committee. It oversees the management of a body of networks composed of 15 members; and guides the Network and its Plenary to ensure that its stated vision, aim and objectives are achieved. The other structure is the Plenary. It is the governing body of the Network and is composed of all members. It makes decisions relevant to the functioning of the Network.

Connect

The Network connects practitioners include the directory of authorities, GlobE plenary meetings, Networking events and regional components. With the directory of authorities, details about authorities' mandates, names and email addresses of contact points are provided to new members and regularly circulated.

The GlobE plenary meetings and networking events establish an informal contact with peers and build trust. It has held four plenaries in Riyadh, Vienna, Madrid and an upcoming plenary in China, with networking events organised for each meeting to reinforce connections and trust between practitioners.

Regional component for the western Balkans. This was launched in September 2023 and consists of a regional network of specialised prosecutors, law enforcement and financial intelligence units from Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia. There has been an increase in the number of the regional component of platform users. There was also a trilateral meeting on financial investigations and asset recovery between North Macedonia, Serbia and Montenegro, which took place in January 2024 in Vienna, Austria.

Regional component for Central Asia. This meeting with the Asset Recovery Committee of Kazakhstan was held on 11 April 2024 in Vienna, Austria. Initial discussions took place on the establishment of the regional component to take place in June 2024 in Almaty, Kazakhstan. The official launch of the regional component was suggested for the end of 2024 in Astana, Kazakhstan.

Collaboration

Facilitation of bilateral and multilateral meetings during plenary sessions. These are informal and confidential discussions on case-specific issues between practitioners.

Global Forum on Asset Recovery (GFAR) Action Series. These were organised by the Stolen Asset Recovery (StAR) Initiative, in collaboration with the International Anti-Corruption Coordination Centre (IACCC) and the International Centre for Asset Recovery (ICAR). They rendered support to GlobE in the fourth GlobE plenary meeting, July 2023. They have also sent requests to the GlobE Secretariat to establish connections with additional authorities from the same or different countries.

On their partnership with the Commonwealth, GlobE has collaborated with 11 observers and hold observer status to three networks. The Commonwealth was endorsed by the Steering Committee as an observer and is currently awaiting approval by the Plenary. The GlobE Network has also put in effort to support practitioners in the advancement of cases, the exchange of good practices, and the development of knowledge products and tools.

Empowerment

The GlobE Network has empowered authorities and practitioners, enhanced capacity building, for example, with virtual awareness, storytelling sessions, in-person trainings and professional development programmes, and have made knowledge products available to their officers.

The creation of a directory of open-source registries. This amplifies access to open-source registries and consolidates information available at the national level into a single tool. The Digital Directory of Open-Source Registries has been launched and it is available on the website with 13 categories of registries available, along with 53 countries and 56 jurisdictions represented.

Launch of a mentorship programme. 'Empowering Women in Justice/for Justice: A Mentorship Programme for Women Professionals in Anti-Corruption Law Enforcement and the Judiciary'. The purpose of this is to create empowerment, leadership development and networking opportunity. It is open to all female practitioners who are part of GlobE member organisations/authorities.

Upcoming events

The storytelling and knowledge sessions take place once a month. The Fifth Plenary Meeting and Eighth Meeting of the Steering Committee were due to take place in Beijing, China, 23–27 September 2024. Also, the GlobE Network's regular induction session for the new contact points will be on the Network's history, organisation, services and ongoing projects, followed by a Q&A session.

Annex 18. Challenges facing heads of anti-corruption agencies

Rose Nunu Seretse

Introduction

Governments have introduced some favourable conditions of service for the heads of anti-corruption agencies looking at the nature of the job. However, beyond these favourable conditions of service, there are challenges that if not managed, can cause frustration and non-performance.

The challenges

- The first challenge is that the head(s) of the agency becomes affected by the power that comes with the position, wanting to settle personal scores. This usually leads to power being used as a weapon by the political masters to go after those with opposing views.
- A second challenge is the lack of prosecutorial and administrative independence. There are jurisdictions where the Prosecutor General is the one with the sole mandate of deciding whether the case is to be prosecuted or not. If you are confronted with a Prosecutor General who is not keen on prosecuting, then it can be quite frustrating. It is similarly frustrating if he believes that once the case is with his directorate, then it is his. Some cases will be returned when you as the investigating authority believe you have strong evidence to take the case to court.
- Another challenge is lack of administrative independence. This in most cases manifests itself in the appointment and transfer of staff, particularly at a senior level, where the power to appoint and transfer staff is vested on the office of the Public Service Management. As the head, you can wake up to a shock where your officers are transferred out of the agency and you are just copied in on the decision. You will have invested heavily in training and developing some of these officers. It becomes even worse when staff transfer does not involve a promotion, because the officer then becomes very bitter.
- The head of an anti-corruption agency is a very important position, given the nature of the job. Questions that have always come up regarding the appointment are: Should the head be appointed by the President? Should the head be appointed by a committee of parliament? Should there be a Board of Directors responsible for the appointment? Should the President appoint in consultation with the leader of opposition? These questions have come up particularly because in some jurisdictions, the tenure of office of the head is not protected and provided for in the law.

- Another challenge may be an investigation that affects the head of the agency personally. There are instances where the immediate family members of the head are reported for possible corruption. When it is a well-known fact then the head will declare conflict of interest and recuse themselves. However, the challenge is balancing the situation with family connections.
- There may also be lack of political will. Political will must not become a rhetoric statement that is not supported by deeds. Political power should not develop a strong quest to micro manage the agency but should demonstrate, among others, the following: ensuring that the anti-corruption agency is fully resourced; ensuring that it carries out its duties freely without interference; that the agency is protected from institutions that have a 'big brother' mentality; the agency is treated differently from other government departments; and that support is provided for the strengthening of the legislative framework.
- There may be a lack of accountability. The job of an anti-corruption officer is a very sensitive one and requires high level of discipline and integrity.
- Another challenge is lack of public confidence. While it is understood that the public can have high expectations and be overly demanding of the anti-corruption agency, the agency should always strive to maintain public confidence. Even whistle-blowers who expose themselves still need your protection.
- Public officers need to be careful when it comes to gifts (whether corporate or not). Officers should always assess the motive behind the gift.

Recommendations

There are several recommendations:

- The first recommendation is that the head of the anti-corruption institution should be appointed by parliament and not directly appointed by the President. This will lead to better political backing at the highest level of government.
- Also, the tenure of the office should not only be provided but also protected by all persons in the country, because corruption affects every single person negatively, either directly or indirectly.
- Agencies should endeavour to hold regular interactions with the public, as well as encourage networking.
- Anti-corruption agencies should be equipped with all the necessary resources to fulfil their mandate. This makes the fight against corruption a bit easier. Agencies should have internal investigative units. They should also sign a service-level agreement with the prosecutions division.
- There should be a vigorous lifestyle audit and a continuous vetting of agency staff, as well as creating a leadership that upholds integrity and 'walks the talk'.

Annex 19. Stepping up the fight against financial crimes in Mauritius through the Financial Crimes Commission Act 2023

Dr Navin Beekarry, Director-General, Independent Commission Against Corruption

Introduction

Mauritius has undergone a major reform of its legal and institutional framework to fight financial crimes, including bribery and corruption, with the enactment of the Financial Crimes Commission (FCC) Act 2023. The Act provides for a new, robust, harmonised, modern and more appropriate structure for an effective fight against financial crimes.

The Act sets up the Financial Crimes Commission as the apex agency with the objective to detect, investigate and prosecute financial crimes, including corruption, money laundering, fraud, offences related to the financing of drug dealing, the accumulation of unjustified wealth, and other ancillary offences connected thereto. The Declaration of Assets (DOA) Act 2018 aligns Mauritius to international standards and best practices – for example, the OECD WGB Anti-Bribery Convention.

The various divisions

One of the divisions of the FCC is the Investigation Division, which consists of the criminal financial crime investigations unit and financing of drug dealings investigation unit. The second division is the Asset Recovery and Management Division. It consists of the asset recovery unit, declaration of asset unit and the unexplained wealth unit. The other two divisions are the education and preventive unit and the Legal Division.

Innovations

The first innovation of the FCC was the creation of a National Co-ordination Committee to, inter alia, co-ordinate criminal enquiries with law enforcement authorities in relation to parallel and complex cases and assist in overcoming any challenges to ensure effective disposal of such enquiries.

Also, an Operations Review Committee was created to serve as an independent oversight mechanism to advise the FCC on the number and the manner in which the following are, inter alia, dealt with: complaints of any offence under this Act made to the FCC; investigations being carried out by the FCC and which have lasted more than 12 months; the exercise by the FCC of its investigatory powers; all cases where the suspects have been provisionally charged for more than 12 months; and investigations that the FCC has completed and discontinued.

Another innovation is the establishment of a Public–Private Task Force. This force is responsible for the development and promotion of co-operation between the public and private sectors in combatting financial crimes.

Under the Mandatory Guidelines, failure to adopt and enforce a code of conduct or guidelines issued by the FCC, or to implement the recommendations following examination and review of the practices and procedures of any public body, constitutes an offence (Section 141(5)).

The creation of the Whistleblowers Act is meant to, according to Section 122: reward informers; Section 123: protect informers; Section 124: protect witnesses; Section 125 -Victimisation; Section 126: provide a witness protection scheme. Finally, the creation of the FCC has reinforced regional and international co-operation and collaboration.

Challenges

Some of the challenges the agency is facing at the moment include ineffective transitioning in terms of implementation/enforcement, inadequate financial and human resources, and the time factor.

Annex 20. The Namibia Anti-Corruption Commission's variety of tools and strategies to combat corruption

Anti-Corruption Commission (ACC), Namibia

The first of the tools/strategies used by Namibia's ACC is the e-justice system. The ACC leverages a web-based platform to streamline investigations. This system utilises content management and electronic forms, making the process more efficient.

Another strategy is the GLoBE Network. Namibia joined the GLoBE Network in 2023. This network facilitates information exchange and co-operation between member countries, allowing for more effective prosecution of cross-border corruption and recovery of stolen assets.

The next strategy is investigative measures through which the ACC actively investigates allegations of corruption. Between April 2023 and March 2024, the ACC investigated 354 cases, fully completing 132 with 277 ongoing. The first measure is implementation of NACSAP 2021–25. Namibia is in the second year of implementing the National Anti-Corruption Strategy and Action Plan (NACSAP) 2021–25. Significant progress has been made, with 13 cluster meetings held and 87 out of 95 actions successfully implemented in the 2022/23 financial year.

The ACC also conducts corruption risk assessments to identify vulnerabilities in various entities. Since 2016, it has assessed more than 50 entities and developed mitigation plans for the 24 most recent assessments (2022/23 and 2023/24 financial years).

Tools also include events – for example, the Anti-Corruption Song Competition. The ACC hosted a song competition aimed at secondary school learners. Reaching over 1,000 students across 33 schools, the competition aimed to instil anti-corruption values and ethics in future leaders. Another example is commemorations. The ACC actively participates in commemorating international and Africa anti-corruption days. It also represented Namibia at the Conference of State Parties (COSP10) in December 2023.

Multilateral engagement also takes place. The ACC participates in regional efforts, such as a workshop for SADC [Southern African Development Community] anti-corruption agencies in October 2023 that facilitated discussion on emerging trends and the development of a regional action plan. The ACC also contributed data for the annual SADC anti-corruption report.

Expansion and infrastructure

The ACC is expanding its reach by establishing a fourth regional office, bringing services closer to the people.

Engagement with stakeholders

The ACC recognises the importance of collaboration with civil society organisations (CSOs) and the private sector. It has a long-standing relationship with CSOs, exemplified by the Zero Tolerance for Corruption Campaign launched in 2006. A business seminar was planned for 4 June 2024, to address ethical concerns within the private sector.

Challenges

The ACC faces challenges such as limited budgets due to economic decline, employee 'poaching' of skilled staff by other organisations, delays in obtaining evidence and slow case finalisation in courts.

Conclusion

Despite these challenges, Namibia has made progress in its fight against corruption. Ranked 8th out of 54 African countries in the 2022 Mo Ibrahim Index and 59th globally in the 2023 Transparency International Corruption Perceptions Index, Namibia is a leader in anti-corruption efforts within SADC. The country remains committed to international co-operation and national efforts to reduce corruption's impact.

Annex 21. Whistle-blowing in Zambia

**Thom Trevor Shamakamba, Director-General,
Anti-Corruption Commission, Zambia**

Introduction

The Anti-Corruption Commission (ACC) is Zambia's leading anti-corruption agency, mandated by the Anti-Corruption Act No. 3 of 2012 to investigate and prosecute corruption, prevent its occurrence, and educate the public. The ACC tackles corruption in both the public and private sectors.

Innovation

Online Anonymous Whistleblowing System (OAWS)

A key innovation for the ACC is the Online Anonymous Whistleblowing System (OAWS), launched in April 2024. This platform empowers citizens and employees to securely report suspected corruption anonymously. Whistle-blowing is crucial in uncovering unethical practices and fostering accountability.

The OAWS offers several advantages:

- The very first is, anonymity. The system protects whistle-blower identities by not storing IP addresses and using secure virtual mailboxes for communication. A unique PIN allows whistle-blowers to track report progress without revealing their identity.
- It provides high security. An end-to-end encryption ensures reports remain confidential and accessible only to authorised personnel who cannot identify the whistle-blower.
- It is also user-friendly. The platform is easy to navigate, requiring no extensive technical knowledge.
- It has a global reach. As a web-based tool, the system is accessible 24/7 from anywhere with an internet connection.
- It provides a feedback and support. The ACC provides feedback and support to whistle-blowers through the system, encouraging continued participation and dialogue.
- It also has anonymous tips and leads. Whistle-blowers can provide additional information and respond to inquiries, leading to more accurate and thorough investigations.

Challenges and continued progress

While the OAWS offers significant benefits, the ACC acknowledges potential challenges. First, the system might be less accessible in remote areas with limited

internet connectivity. Second, power outages can disrupt internet connectivity, impacting the system's effectiveness. There is also a risk of whistle-blowers misusing the system for non-constructive purposes, like case progress inquiries.

Successes

Despite these challenges, the ACC has made significant progress since the last conference in May 2023. Here are some highlights:

- It has made successful prosecutions by making 24 arrests and convictions related to corruption.
- For asset recovery, it has collaborated with law enforcement agencies. The ACC has forfeited 25 vehicles valued at over US\$800,000, restricted and seized additional vehicles worth over US\$1.2 million, and restricted/seized properties valued at over US\$1 million.
- It has improved investigative capacity. The ACC developed a Forfeited Assets System for asset tracking and acquired new digital forensics software to analyse electronic devices used in potential corruption cases. This has been bolstered by training staff and technical assistance from the International Centre for Asset Recovery (ICAR).

The ACC's commitment to innovation and collaboration demonstrates its dedication to effectively combatting corruption in Zambia.

Annex 22. Presentation by Uganda

Inspectorate of Government

Uganda's Inspectorate of Government (IGG) focuses on promoting good governance by combatting corruption. IGG's strategic direction aims to enhance the detection, elimination and prevention of corruption through engagement with both public officers and citizens.

IGG has implemented an innovative approach by engaging citizens directly, encouraging them to report corruption and become active participants in the war on corruption. Public officers, especially those in leadership positions, are also targeted for engagement, creating awareness of the role they play in curbing corruption and discussing the challenges they face.

This approach has resulted in significant achievements, including the recovery of millions of US dollars and the prosecution of senior officials. However, challenges – such as fear of victimisation, low remuneration and informal directives – persist.

The IGG's work also emphasises the need for government entities to incorporate anti-corruption measures into their development plans and budgets.

Annex 23. Conducting lifestyle audits

Leonard Lekgetho, Chief Operations Officer, Special Investigating Unit (SIU), South Africa

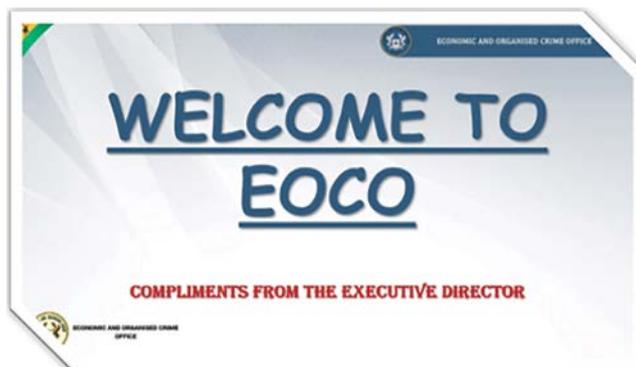
The Special Investigating Unit (SIU) in South Africa is mandated to combat corruption, malpractice and maladministration through forensic investigations and civil litigation.

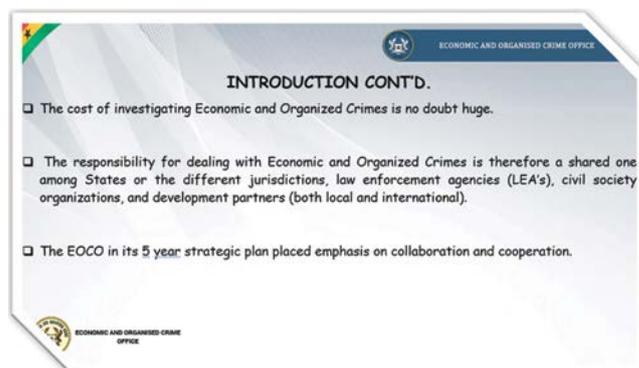
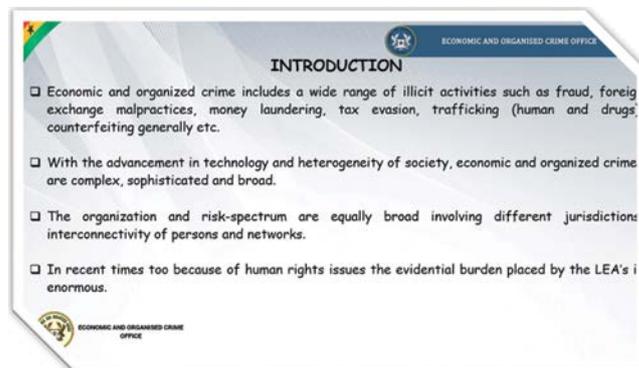
SIU's methodology includes the implementation of lifestyle audits, which have become compulsory for all national departments and provincial government components. Lifestyle audits are an important tool for detecting fraud, corruption and unethical conduct. SIU performs audits to examine the financial profiles of public service employees, comparing declared income with observed assets to identify discrepancies and undeclared income sources. The process includes the analysis of bank accounts, property ownership, vehicle ownership and other financial records. The outcome of these audits is the identification of weaknesses in internal controls and the promotion of transparency and ethical behaviours within public institutions.

The SIU's methodology aligns with guidelines set by the Department of Public Service and Administration (DPSA), with deviations that improve the effectiveness of the process. The SIU's efforts to report 'red flags' and recommend further investigations have led to the identification of financial irregularities among public officials. Challenges include incomplete or inaccurate reporting of financial records, but the results from audits continue to highlight corruption risks and suggest corrective actions.

Annex 24. Institutional collaboration in combatting corruption and economic crime

Abdulai Bashiru Dapilah, Deputy Executive Director,
Economic and Organised Crime Office (EOCO)





 ECONOMIC AND ORGANISED CRIME OFFICE

WHAT DOES IT MEAN TO COLLABORATE?

To collaborate is to work together for a common purpose or goal. There are both national and international co-operation or collaboration:

The EOCO ACT 2010 (ACT 804) mandates the Office to:

- ❑ Cooperate and collaborate with other LEA's in the course of its work.
- ❑ Disseminate information gathered in the course of investigation to other LEA's, other appropriate public agencies and other persons the Office considers appropriate.
- ❑ It also conducts joint investigations with other LEA's.
- ❑ Co-operates with relevant foreign or international agencies in furtherance of this Act.
- ❑ Uses experts to do its work.

➤ Inter-agency/National co-operation or collaboration: EOCO working with other Law Enforcement Agencies (GPS, OSP, NIB, GIS, etc.); CSOs, regulatory bodies (BOG, NCA, GRA, SEC, etc.); Service providers (Banks, Telcos, MMCs), etc. to carry out its mandate.

❑ The EOCO has entered into MOUs with many of these organizations and service providers.

 ECONOMIC AND ORGANISED CRIME OFFICE

 ECONOMIC AND ORGANISED CRIME OFFICE

THE NEED FOR COLLABORATION

- ❑ On 23 September 2010 in Monrovia, Liberia, the UN Deputy Envoy Henrietta Mensa-Bonsu stressed the importance of efficient collaboration and coordination between the various aspects of the criminal justice system, as an essential aspect for effective prosecution and other case disposal mechanism.
- ❑ This, the Deputy Envoy noted, is an important element in enabling the effects of good policing to be felt.
- ❑ The 9/11 Commission observed that US government's single greatest failure preceding the September 11, 2001, attacks was the inability of federal agencies to effectively share information about suspected terrorists and their activities.

 ECONOMIC AND ORGANISED CRIME OFFICE

 ECONOMIC AND ORGANISED CRIME OFFICE

FORMS OF INTERNATIONAL CO-OPERATION

- **Formal:** At The State Level, Ghana Is A Member To The UN CONVENTION AGAINST TRANSNATIONAL ORGANISED CRIME-PALERMO CONVENTION OF 15TH NOVEMBER 2000:
 - UN Convention Against Illicit Trafficking In Narcotics Drugs And Psychotropic Substances, 1988;
 - International Convention For The Suppression Of Financing Of Terrorism, 1999;
 - Inter-governmental Action Group Against Money Laundering - GIABA;
 - UN Convention Against Corruption, 2003;
 - Budapest Convention, UNDOC, Etc.
- **Informal:** Police To Police: Law Enforcement To Law Enforcement
- EOCO Also Signed MOU's Or Has Good Working Relationships With The EFCC, NCA, FBI, CANADIAN MOUNTED ROYAL POLICE, SFO, UK Etc.

 ECONOMIC AND ORGANISED CRIME OFFICE

 ECONOMIC AND ORGANISED CRIME OFFICE

MODELS

- ❑ **Lead Agency Model**-Two or more agencies collaborate to achieve a mutual objective. One agency provides a greater level of service than others as a result of particular skills or facilities that the agency can offer. Extra investment of resources is made by the lead agency.
- ❑ **Strategic Alliance**-Between two or more agencies where the aspiration is for all parties' benefits to be greater than their individual efforts. It requires sharing of resources and skills and calls upon trusted working relationships.
- ❑ **Shared Services**-Involves the sharing of specific functions between two or more agencies. Resources, skills and equipment can be pooled together to create a refined and efficient structure.

 ECONOMIC AND ORGANISED CRIME OFFICE

 ECONOMIC AND ORGANISED CRIME OFFICE

AREAS OF COLLABORATION

- Investigations
- Training
- Mutual Legal Assistance
- Intelligence Gathering and Sharing
- Freezing/Confiscation
- Extradition
- Logistics

 ECONOMIC AND ORGANISED CRIME OFFICE

 ECONOMIC AND ORGANISED CRIME OFFICE

BENEFITS DERIVED BY LAW ENFORCEMENT FROM COLLABORATION AND CO-OPERATION

- It gives Law Enforcement Agencies greater efficiency and less duplicated efforts, making them more effective.
- Gives Law Enforcement Agencies access to up-to-date information, ideas and modern trends in combating crime.
- Provides Law Enforcement Agencies with greater innovations and flexibility to respond to changing and emerging or more complex and sophisticated needs and changing operational environment.
- Offers Law Enforcement Agencies additional expertise-capacity building and Training Programmes based on International best practice.

 ECONOMIC AND ORGANISED CRIME OFFICE

 ECONOMIC AND ORGANISED CRIME OFFICE

BENEFITS DERIVED BY LAW ENFORCEMENT FROM COLLABORATION AND CO-OPERATION CONT'D.

- Access to additional resources, cuts costs or lowers costs through sharing Of resources.
- Addresses operational needs.
- Increases public trust and confidence.
- Team Members in local and International co-operation gain exposure and interest in understanding diverse perspectives from other team members.

 ECONOMIC AND ORGANISED CRIME OFFICE

 ECONOMIC AND ORGANISED CRIME OFFICE

OBSTACLES TO COLLABORATION

- Personality clashes
- Complexity in decision making
- Rush or haste to take credit
- Unwarranted Suspicion
- Resistance to change
- Lack of consistency and clarity on roles and responsibilities.

 ECONOMIC AND ORGANISED CRIME OFFICE

ECONOMIC AND ORGANISED CRIME OFFICE

HOW TO EFFECTIVELY DEAL WITH THESE OBSTACLES

Successful Collaborations must have the following:

- MOU's on objectives, clearly set out and understood;
- Good Inter-Agency relationship
- Clear and agreed mutual benefits
- Eschew suspicion
- Work towards achieving a common goal
- Effective communication and leadership.

ECONOMIC AND ORGANISED CRIME OFFICE

ECONOMIC AND ORGANISED CRIME OFFICE

FBI & CANADIAN CASES INVESTIGATED BY THE OFFICE FOR THE YEAR JAN 2023-MAR 2024

FBI

- A total of **35** cases
- Estimated losses-**18.6 million USD (cash)**, and about **250 USD in Crypto-currency**.
- Sponsoring of Crypto-currency investigations training and Certification of some EOCC Staffs.

Canada/ FBI

- Transnational vehicle organized crime- A total of **120** cars frozen and **68** recovered (the cases are at various stages of prosecution).

NCA

- A total of **4** cases
- Total losses-**1.2M GBP**, and **10,000 Euros**.
- Assets frozen at the instance of the Office by Binance amounted to **9M USD**.
- UK GHANA GOLD Project/illicit financial flows in gold exports.

SIZ

- The introduction of the Case Tracking System (CTS) as a means of shifting from the traditional/paper system to the paperless/referencing/tracking of Cases System

ECONOMIC AND ORGANISED CRIME OFFICE





Property confiscated (Estimated cost of property was US\$1.8M)





PROPERTY CONFISCATED FROM EDMOND DARKWA

17

THE REPUBLIC V MAURICE ASOLA
FADOLA



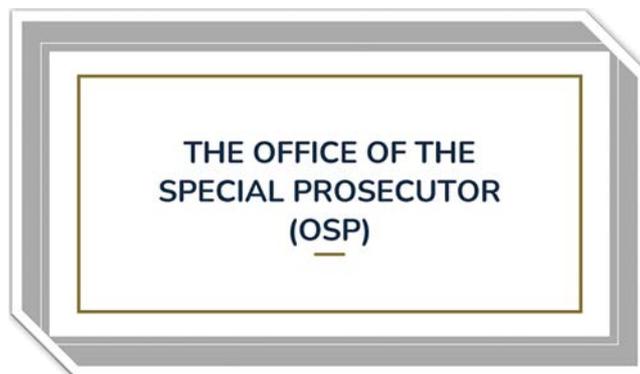

PROPERTY CONFISCATED FROM EDMOND DARKWA

18



Annex 25. The Office of the Special Prosecutor

Samuel Appiah Darko, Director, Strategy, Research and Communications Division,
Office of the Special Prosecutor, Ghana



WHO WE ARE



The Office of the Special Prosecutor (OSP) is a specialised independent anti-corruption agency established by an act of the Parliament of Ghana to investigate and prosecute acts of corruption and corruption related offences. It is also responsible for recovering proceeds of corruption and take steps to prevent it.

The OSP is the premier enforcer of Ghana's anti-corruption laws, and it is the only state agency empowered to carry out criminal prosecution of corruption and corruption related offences.

OUR STRATEGY

- PAST**
 - Focus on organizational change rather than number of convictions
 - Small number of targets to send clear signals
 - Repurpose of proceeds of corruption
- FUTURE**
 - Tech-savvy
 - Legislative Amendments
 - Corruption League Table
- CURRENT**
 - Corruption Risk Analysis
 - Increase collaboration and transparency, internally and externally
 - Embrace opportunities to communicate with the public



Breaking New Grounds (Innovations)

Fearless in Pursuing Our Mission

The Office has taken on ministers of state, heads of local governments, heads of regulatory agencies, management of development authorities, among others.

The Cecilia Dapaah case

The OSP in July 2023 commenced investigations into the then Minister of Sanitation and Water Resources, Madam Cecilia Dapaah, and her husband Mr Daniel Osei Kufuor.

Breaking New Grounds...The Cecilia Dapaah Case

Fearless in Pursuing Our Mission

The evidence and intelligence gathered pointed to suspected money laundering and structuring.

The case was therefore directed to the Economic and Organized Crime Office (EOCO).

This was the first time in Ghana's history that an anti-corruption investigation had been opened on a sitting minister of state who is an out-and-out member of the ruling party.

Breaking New Grounds...Beaming the Dark Corridors of Elections



From September 2023 to January 2024 there were internal party elections in Ghana. Videos allegedly depicting vote buying cum selling were in circulation, particularly on social media.

The OSP issued wanted notices for people filmed allegedly engaging in vote selling and invited others for questioning.

It was noticeable that, elections held after this intervention showed drastically reduced incidences of vote buying and selling.

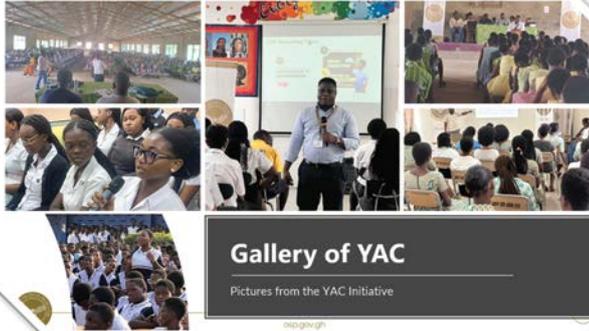
Breaking New Grounds...Corruption Prevention



The Office of the Special Prosecutor (OSP) is of the conviction that preventing corruption is ultimately less costly than tackling corruption post-facto.

The OSP's anti-corruption education and sensitization activities have reached more than 6 million Ghanaians since 2022.

The OSP's work in a customs case about the abuse of customs advance rulings and benchmark values led to Ghana's Parliament eliminating the provisions that permitted the discretionary use of such practices.



Gallery of YAC

Pictures from the YAC Initiative

RESULTS...Our Motivational Figures

US\$40 million

- Disruption of counterfeiting syndicate

GHC6.8 billion

US\$528 million

- Government transactions suspended due to Corruption Risk Assessments

GHC 101 million

US\$ 7.7 million

- Savings made to state from OSP intervention, in cases such as bloated contracts

RESULTS...Our Motivational Figures

GHC 1 million

US\$82,000

- Recoveries made

12%

- Revenue increment in auction sales for Customs Division of Ghana Revenue Authority (GRA).

14



RESULTS

Pursuant to Regulation 7 & 8 of the Office of the Special Prosecutor Regulations, 2018, the Office has *polygraphed* majority of its staff as a measure to uphold integrity within the organization.

15



CHALLENGES

- Gaps in Ghana's anti-corruption framework. Although Ghanaian constitution criminalizes unexplained wealth and upholds reverse burden, the OSP Act lacks an Unexplained Wealth Provision.
- Poor collaboration among law enforcement and anti-corruption agencies.
- Sponsored attacks and propaganda
- The Office has not been exempted from the ubiquitous challenge of **insufficient funding** that has plagued most public institutions in Ghana. Despite some admirable efforts of government in resourcing the Office, there is still a significant resource gap.

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REFLECTIONS



There is the urgent need for a **Corrupt Practices Act** in Ghana. The Act will bring all corruption and corruption-related offences that are currently scattered across a number of laws into one specific law, offering anti-corruption institutions a harmonized reference point . .

The introduction of **Unexplained Wealth Order (UWO)** will aid the recovery of the proceeds of corruption and other crimes. Wealth that is insufficiently explained as originating from a legitimate source will be confiscated.

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The Office of the Special Prosecutor is encouraged by these achievements within the very short period that we have started operations.

With the support of other anti-corruption institutions, judiciary, civil society groups, and the public, and the learnings from and collaborations with our peers across the Commonwealth, we are very optimistic of achieving more together!!

Thank you for your attention!!!



Annex 26. Combatting corruption in Ghana: key anti-corruption interventions

Mercy Larbi, Deputy Commissioner, Commission on Human Rights and Administrative Justice (CHRAJ)

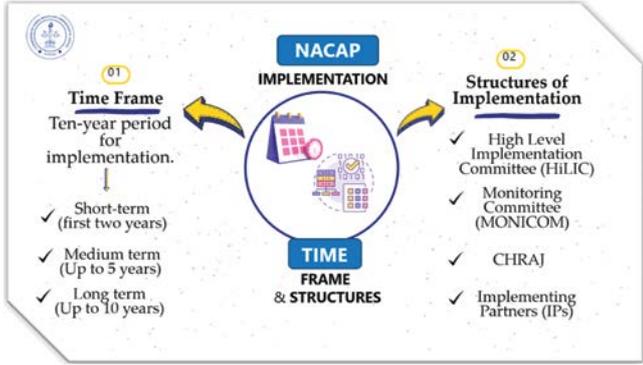
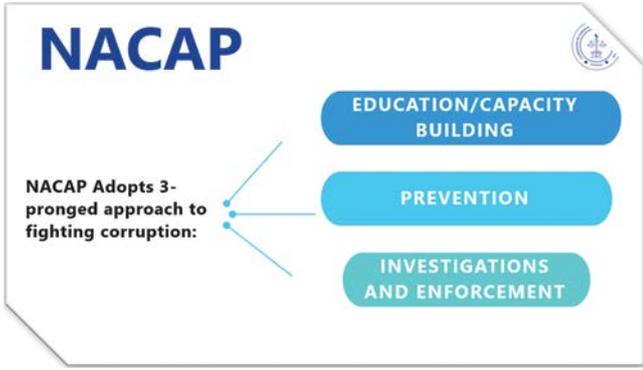


Content

- Introduction
- Current Strategy at Fighting Corruption in Ghana
- Key Anti-Corruption Interventions
- Challenges
- Recommendations
- Conclusions

Current Strategy at Fighting Corruption in Ghana

Since 2014, Ghana has been implementing a National Anti-Corruption Action Plan (NACAP) as a national strategy for fighting corruption over a ten (10) year period. Under NACAP, a strong partnership has been formed between the Public Sector, the Private Sector and Civil Society.

Key Anti-Corruption Interventions

- Increased sensitisation on the evils of corruption and the mechanisms for reporting corruption, including whistleblowing : **7,007 programmes alone in 2022**. Effects- Increased cases e.g., CHRAJ, 284 cases on non-compliance with Chapter 24 of the 1992 Constitution in 2022.
- Legislations to combat corruption and enhance integrity, i.e amendments to Companies Act, Contracts Act, Right to Information, Whistleblower Act etc
- Digitilisation
- Enhancing the use of safe reporting mechanisms at the workplace such as hotlines, confidential online reporting platforms and anonymous reporting portals.



Key Anti-Corruption Interventions

- Development of a Key Accountability Institution (KAI) Forum **Action Plan** with focus on capacity building, joint/parallel investigations on select cases, resource mobilisation, media engagements, community sensitisation and mobilisation, etc.
- Developing Standard Operating Procedures (SOPs) for Whistleblower Protection in Ghana.





KEY ANTI-CORRUPTION INTERVENTIONS - Corruption Risk Assessment of Public Sector Institutions

- Corruption Risk Assessment in the fisheries and health sectors with assistance from UNODC
- Implementation of Corruption Risk Mitigation Strategies for Ghana Health Service and the Ministry of Fisheries and Aquaculture Development.
- Development of Integrity Committees

Initiatives in the Pipeline

- **National Cultural Review(NCR)** and
- **School Integrity Project(SIP)** launched in 2021.

The rationale for these projects are as follows:

- ✓ To address the challenges with value systems, mindset, attitudes and the totality of way of life in Ghana.
- ✓ To inculcate in the younger generation integrity, discipline, selflessness, lawfulness and patriotism through the Introduction of Modules and Elements to highlight and strengthen good ethical values in Primary, Secondary, Tertiary and Non-Formal Education
- ✓ To build a culture of integrity at all levels of the Ghanaian Society etc.



ONGOING INITIATIVES: 1.Evaluation of the National Anti-Corruption Action Plan (NACAP)

Independence of Evaluation Exercise:

- a. Evaluation is free from political control
- b. Evaluators are impartial
- c. Evaluating Team-National and International have never been involved in the design, development and implementation of NACAP.
- d. Participation of UNODC
- e. Evaluation adopts scientific and rigorous evaluation methods and processes to guarantee its independence and credibility.



**ONGOING INITIATIVES:
Evaluation of the National Anti-Corruption Action Plan (NACAP)**

THE PROCESS

1. Request for technical support from UNODC in September 2023 by HiLIC.
2. Official Launch of evaluation exercise by His Excellency the President on 21 December 2023 to ensure national ownership and broad participation of all Stakeholders in the exercise.

EVALUATION RATIONALE:

To assess the achievements of NACAP and document lessons drawn, experiences and insights gained from the implementation of NACAP to inform design and development of NACAP II.



KEY ANTI-CORRUPTION INTERVENTIONS – Evaluation of the National Anti-Corruption Action Plan (NACAP)

SCOPE:

The evaluation covers the context within which NACAP was conceptualised, developed, approved and implemented to assess its outcomes. It covers the period (2009-2014) before the implementation of NACAP, considering the possibilities that some corruption avenues opened as others closed within the period and also to serve as a basis of baseline data for the evaluation. The evaluation covers the NACAP implementation period (2015-2024).



**ONGOING INITIATIVES:
Evaluation of the National Anti-Corruption Action Plan (NACAP)**

SPECIFIC OBJECTIVES OF EVALUATION:

1. Link the outcomes of the NACAP progress reports and evidence that will emerge from the evaluation exercise to ascertain whether the expected output and outcome indicators, as set out in the performance framework, have been achieved.
2. Re-assess the operational philosophy of NACAP.
3. Identify external determinants of the outputs, outcomes and impact of NACAP.
4. Assess the extent to which NACAP has been implemented based on the seven broad themes (evaluation criteria) which are relevance; coherence; effectiveness; efficiency; impact; sustainability; and human rights, gender equality, disability inclusion and leaving no one behind.

This evaluation criteria follows international standards.

Preparatory Steps To Evaluation

1. Media engagement and sensitization by HiLIC, CHRAJ and GSS on 8 December 2023.
2. Constitution of Evaluation Team consisting of:
 - National Evaluation Team led by the Government Statistician, Prof. Samuel Kobina Annim.
 - International Evaluation Advisors



Management Structure: 1. Evaluation Manager (GSS)

- Selection of the international evaluation team;
- Overall responsibility for coordinating the independent final evaluation from start to completion;
- Day-to-day management of the evaluation in accordance with the Evaluation ToR;
- Provide supervision and oversight, help guide the evaluation team and facilitate the evaluation as necessary;
- Coordination with the CHRAJ and HiLIC throughout the process;
- Send the final evaluation report to HiLIC for review.



Management Structure: 2. UNODC's Independent Evaluation Section (IES)

- Provide tools, guidelines and templates to be used in the evaluation process;
- Provide guidance, supervise and provide quality assurance to the evaluation process;
- Review and comment on all deliverables during the evaluation process:
 - Terms of Reference;
 - Selection of the international evaluation team;
 - Inception Report (incl. methodological approach);
 - Draft Evaluation Report;
 - Final Evaluation Report, Evaluation Brief and PowerPoint slides on the final evaluation results;
 - Evaluation Follow-up Plan;



Management Structure: UNODC's Independent Evaluation Section (IES)

- Attend validation workshops and presentation of final evaluation results, as applicable;
- Ensure that international evaluation requirements, particularly those relating to independence, confidentiality and impartiality, are met.

Please find the respective tools on the IES web site:

<https://www.unodc.org/unodc/en/evaluation/guidelines-and-templates.html>



Management Structure: 3.CHRAJ

- Prepare draft Terms of Reference for the evaluation;
- Identify, in coordination with GSS, suitable substantive national experts for the evaluation team;
- Provide and facilitate access to stakeholders for data collection (i.e., for interviews, surveys, etc.);
- Compile and provide desk review materials to the evaluation team;
- Review the draft report, draft brief and draft PPT presentation;



Management Structure: CHRAJ

- Facilitate and attend validation workshop and presentation of final evaluation results, as applicable;
- Provide support to the evaluation team throughout the process, as needed;
- Make arrangements for travel of the international evaluation team
- Provide logistical support, including visa support letters, airport pick-ups, to the international evaluation team, as needed;
- Ensure timely release of funds for the evaluation exercise.



Management Structure: 4.International Evaluation Consultants:

- Save to & Done
- Contribute to the inception report, methodology and drafting of tools for the evaluation;
 - Provide quality assurance to the evaluation process;
 - Contribute to data collection and analysis and report writing;
 - Attend validation workshops and presentation of final evaluation results, as applicable;
 - Ensure that international evaluation requirements, particularly those relating to independence, confidentiality and impartiality, are met.



Management Structure: HiLIC

- Approve, in coordination with CHRAJ and GSS, suitable substantive national experts for the evaluation team;
- Provide and facilitate access to stakeholders for data collection (i.e., for interviews, surveys, etc.);
- Support the evaluation team with desk review materials;
- Monitor data collection for the evaluation;
- Review the draft report;
- Facilitate and attend the validation workshop and presentation of final evaluation results, as applicable;
- Provide support to the evaluation team throughout the process, as needed;
- Ensure timely release of funds for the evaluation exercise.



Management Structure: 5.National Evaluation Team.

- Sensitise the public on the evaluation through launch and media engagement
- Prepare Draft inception Report
- Prepare and evaluate Draft inception instruments
- Review NACAP Evaluation Report
- Train field Assistants
- Conduct in person Survey
- Analyse field data
- Compilation of Evaluation Report etc.



Challenges

- Fighting corruption is costly. Presently, the main financier for the NACAP is the state. Unfortunately, the state is unable to meet all the budgetary needs.
- Reluctance of citizenry to report on acts of corruption
- Lack of sufficient political will to fight corruption.
- None passage of the Conduct of Public Officers Bill, 2022 into law
- Reluctance of implementing partners to implement and report on NACAP.



What NACAP 2 Envisages

- Strengthening the Financial Sector and Key Sectors against corruption and shocks.
- Implementation of the Schools Integrity Project (SIP).
- Implementation of the National Cultural Review Programme (NCRP).
- Engage various sectors to develop Sectoral Action Plans.
- Strengthening the participation of CSOs, Media, Private Sector Organisations and Faith Based Organisations in the fight against corruption.
- Prioritise key anti-corruption legislation including the Conduct of Public Officers Law, Illicit Enrichment Law, etc.



THANK YOU

Annex 27. The Fisheries Transparency Initiative: transparency in fisheries in Africa

Godfred Ameyaw Asiedu, Regional Coordinator for Anglophone Africa, Fisheries Transparency Initiative

The Fisheries Transparency Initiative (FiTI) is a global partnership that helps coastal countries improve transparency in how they manage their fisheries. This transparency is essential for ensuring the long-term sustainability of fish populations.

The FiTI standard for transparency in fisheries covers the following aspects.

- i. Public registry of national fisheries laws, regulations and official policy documents
- ii. Fisheries tenure arrangements
- iii. Foreign fishing access agreements
- iv. The state of the fisheries resources
- v. Large-scale fisheries (vessel registry, payments for fishing, recorded catch data)
- vi. Small-scale fisheries
- vii. Fisheries subsidies
- viii. Official development assistance
- ix. Labour standards
- x. Beneficial ownership

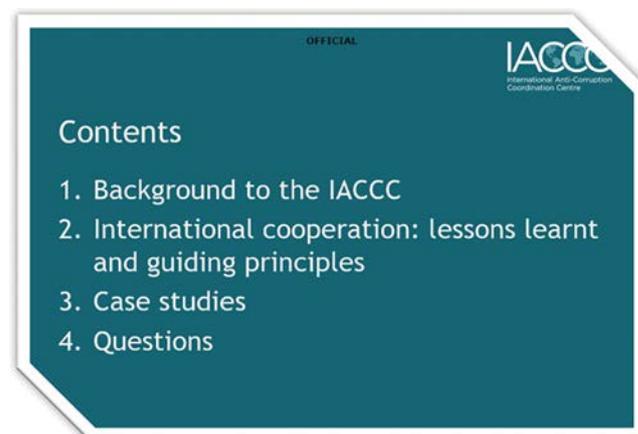
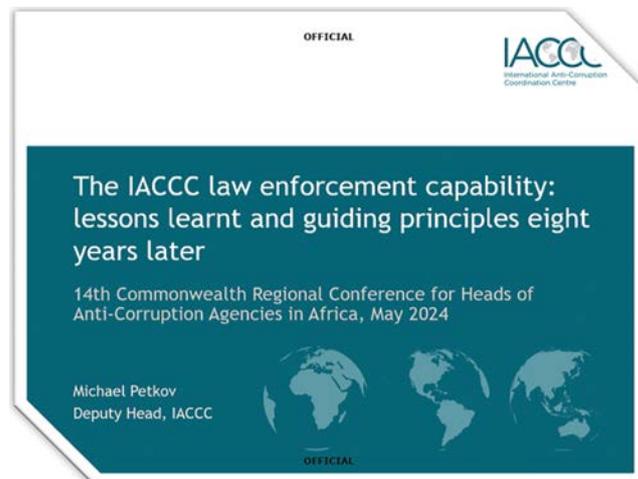
African countries engaged with FiTI are as follows.

- Candidate countries: Cabo Verde, Madagascar, Mauritania, Seychelles, São Tomé and Príncipe. These countries are considering joining FiTI.
- Committed countries: Guinea, Senegal. These countries have officially joined FiTI.
- Targeted countries: Cameroon, Comoros, Ivory Coast, Ghana, Guinea-Bissau, Kenya, Mauritius, Maldives, Mozambique, Namibia, Nigeria, Sierra Leone, Tanzania. These countries are potential future members.

Day 3

Annex 28. The IACCC law enforcement capability

Michael Petkov, NCA Intelligence Manager, International Anti-Corruption Coordination Centre, UK



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1. Background to the IACCC

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What?

- **Grand Corruption**
Acts of corruption committed by high-level public officials

- **Offences that could be considered Grand Corruption**
Bribery of public officials, Embezzlement, Abuse of function, Illicit Enrichment, laundering of the proceeds of crime

- **Stolen assets and societal impact**
Corruption offences involving vast quantities of assets and that threaten political stability and sustainable development

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Coordination Centre

What?

- Mission: Coordinating a Global Law Enforcement Response to Grand Corruption
- Intelligence led, providing high-grade, international intelligence support to investigations
- Supporting investigations, not in-house investigations
- Free resource

IACCC does not take sovereignty of an investigation. Instead we support a referring jurisdiction to gain evidence for successful prosecutions and recover stolen assets.

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When and why?



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How?

1. Simplify international co-operation
2. Provide a comprehensive intelligence picture rapidly using our unique intelligence capabilities
3. Accelerate international investigations and asset recovery with niche investigative support
4. Encourage international cooperation through key operational and strategic partners including Egmont, ICAR, INTERPOL and STAR
5. Recover and ultimately return stolen assets to affected states through case coordination support

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2. International cooperation: lessons learnt and guiding principles

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Academic and policy papers



- Specific support on MLA requests
- Increasing the access to world class resources
- Using informal relationships to build trust and confidence

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Academic and policy papers

1. Active facilitation of information sharing and capacity-building
2. Operational, legal and financial support to investigations
3. Investigations and other proceedings



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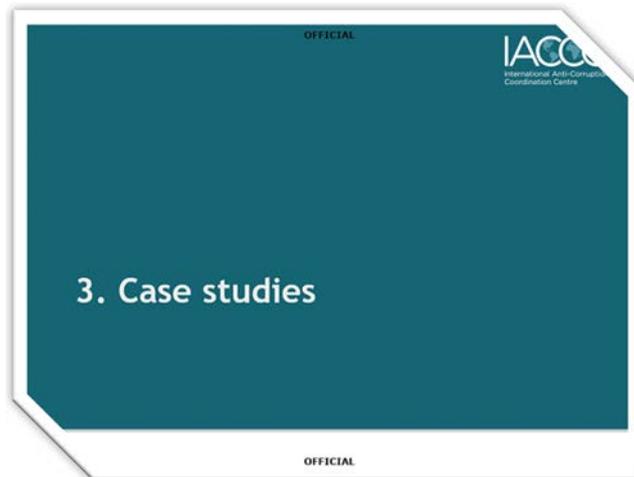
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Guiding principles for international cooperation (non-exhaustive)

1. Trust and communication
2. Informal/police-to-police/administrative cooperation is king
3. Clarity of MLA requests, rather than simply content
4. Importance of justification, necessity and proportionality
5. Financial analysis, rather than chasing the suspect
6. Lean on international organisations that can provide assistance - be demanding of the IACCC!

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Europe case study - significant international intelligence collection

- Initial referrals in early 2023
- Dedicated IACCC intelligence resource comprised of 3 officers
- International intelligence collated
- First intelligence report disseminated in September 2023, followed by a further six up to February 2024
- Providing resource intensive operational support



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Africa case study - third party coordination

- Built trust with law enforcement authority over a number of years
- New referral in late 2020
- Intelligence request shared with IACCC AMS - approximately \$250 million identified in one jurisdiction
- Rapid intelligence dissemination one month later; two further intelligence reports shared
- Significant resource to support asset recovery in this jurisdiction
- Ongoing support for the recovery of stolen assets in three third party jurisdictions

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Asia case study - international coordination

- Estimated over \$4 billion stolen, diverted lost to Malaysia
- Over 34 main suspects covering four phases of offending between 2009 and 2014
- Four jurisdictions with separate large criminal investigations, supported by multiple jurisdictions
- IACCC facilitated or serviced 28 ILORs on this case alone

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Coordination Centre

Asia case study - international coordination

ITEMS SEIZED FROM NAHS-LINKED RESIDENCES

- 1,600 Bracelets
- 2,200 Rings
- 2,800 Pieces of jewellery
- 2,100 Bangles
- 1,400 Necklaces
- 14 Ties

OTHERS

- 423 Watches
- 234 Sunglasses
- 567 Handbags
- Cash

TOTAL: RM900m - RM1.1b

Bonhams



Proposed for sale



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Asia case study - international coordination








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4. Questions?



michael.petkov@nca.gov.uk

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The image is a slide with a white background and a dark blue border. At the top center, the word "OFFICIAL" is written in small, dark blue capital letters. In the top right corner, the IACCC logo is displayed, consisting of the letters "IACCC" in a large, dark blue font, with the full name "International Anti-Corruption Coordination Centre" in a smaller, dark blue font below it. The main heading "4. Questions?" is positioned in the upper left area in a bold, dark blue font. Below the heading, three globes are arranged horizontally, each showing a different view of the Earth. The first globe shows the Americas, the second shows Europe and Africa, and the third shows Asia and Australia. At the bottom left, the email address "michael.petkov@nca.gov.uk" is written in a dark blue font. At the bottom center, the word "OFFICIAL" is written in small, dark blue capital letters. A dark blue horizontal bar is located at the very bottom of the slide.

Annex 29. Overview of the fight against corruption in Kenya

Ethics and Anti-Corruption Commission (EACC)

Kenya's Ethics and Anti-Corruption Commission (EACC) is mandated to enforce the law through investigations, asset tracing, asset recovery, disruption of corruption networks, undercover operations and ethics enforcement. In addition, the EACC works to prevent corruption by conducting corruption risk assessments, systems examinations and by issuing advisories. It also promotes ethical leadership standards through public education, awareness campaigns and training programmes, including the establishment of Integrity Clubs. The commission actively promotes standards and practices in ethics and integrity by issuing advisories, cautions and self-declaration forms.

The EACC employs various strategies to combat corruption, focusing on high-impact investigations, asset tracing and recovery, prevention initiatives, and partnership approaches. These strategies are guided by specific criteria such as the value involved, the prominence of personalities and public interest to maximise deterrence. The commission targets unexplained wealth and corruptly acquired assets using civil litigation and alternative dispute resolution mechanisms (ADR). These methods aim to proactively mitigate corruption by promoting ethics and integrity at both the institutional and personal levels, while fostering strategic linkages with stakeholders in the fight against corruption.

Asset recovery in Kenya involves mechanisms such as civil litigation, ADR and targeting unexplained wealth under Sections 26 and 55 of the Anti-Corruption and Economic Crimes Act (ACECA). Recovered assets may include those seized through conviction-based processes after criminal proceedings or non-conviction-based methods via civil litigation and ADR. Investigators must prove, on a balance of probabilities, that an individual possesses assets disproportionate to their legitimate income. The evidentiary burden then shifts to the accused to provide a satisfactory explanation for the assets' legitimate origin.

The management of recovered assets is governed by legal frameworks such as Section 56C of the ACECA and Section 109 of the Proceeds of Crime and Anti-Money Laundering Act (POCAMLA). Recovered funds are deposited into the Consolidated Fund after judgment, while funds preserved in suspect accounts are managed pending court determinations. The disposal of seized properties is conducted through public auctions, with the proceeds, less auctioneer fees, deposited into the EACC Asset Recovery Account. Additionally, an asset manager is appointed to oversee the management, preservation and disposal of confiscated property. The EACC is also pursuing legislative amendments to retain a percentage of recovered proceeds.

The EACC has achieved significant milestones under its 2018–2023 Strategic Plan. Approximately US\$180.4 million (23.74 billion Kenyan shillings, KSh) worth of assets have been recovered, and forfeiture cases for assets valued at US\$308.4 million (KSh40.78 billion) are ongoing. The commission has prevented losses of US\$277.1

million (KSh36.5 billion) by disrupting corruption networks and concluded 655 investigations, with 251 cases finalised in court. In terms of corruption prevention, system reviews and risk assessments were conducted for 26 national government ministries, departments and agencies and 27 county governments. A total of 686 advisories were issued, leadership and integrity codes were approved for public entities, and the integrity of 48,383 public officer candidates was verified. Training programmes under the National Integrity Academy (NIA) have also been ongoing.

Emerging trends in corruption and economic crimes include splitting cash withdrawals to evade statutory limits, using professionals as conduits for corruption, and utilising shell companies, agents and proxies to conceal ownership and financial transactions. 'Judicial forum shopping' also takes place to delay investigations and difficulties have occurred in completing international investigations due to slow processing of mutual legal assistance (MLA) requests. Corruption has also been observed in budgeted projects through conspiracies among procuring entities, contractors and service providers.

The EACC has introduced innovative approaches to combat corruption. Public officials charged with corruption are suspended under Sections 62 and 63 of the ACECA and the Leadership and Integrity Act. Charged officials receive half-pay during investigations, while convicted officials are suspended without pay pending appeal. Lifestyle audits are conducted to monitor public officials' and their families' lifestyles. Automation of government processes has been prioritised to reduce human interaction, enhance efficiency and promote transparency, with the EACC accessing digital platforms such as IFMIS, company registers, and NTSA databases. The EACC has also strengthened policies and legal frameworks, including the Conflict of Interest Bill, and has adopted multisectoral and inter-agency approaches to promote financial transparency and integrity.

Annex 30. Fighting corruption in Eswatini

Eswatini Anti-Corruption Commission

The Eswatini Anti-Corruption Commission (ACC) was established under the Prevention of Corruption Act, 2006, with a three-part mandate: education, prevention and investigation.

Innovative initiatives

Initiatives include the formation of a Tripartite Task Team comprising the ACC, Royal Eswatini Police (REPS), and the Director of Public Prosecution (DPP) to tackle high-profile commercial crimes; cross-designations between ACC and REPS to enhance collaboration; and implementation of 360-degree investigations with team members from diverse expertise to reduce case backlogs.

Challenges are as follows.

- Limited capacity and reliance on outdated technology.
- Delays in mutual legal assistance (MLA) for cross-border cases.
- Insufficient funding.

Results.

- Reduced case backlogs and improved public confidence.
- Successful investigations supported by whistle blower information.

Lessons learned.

- The importance of collaboration and resource pooling among agencies.

Recommendations.

- Enhanced international co-operation and networking.
- Securing adequate funding and capacity-building initiatives.

Annex 31. Strengthening institutions and promoting transparency: the crucial role of non-state actors in anti-corruption

Mary Addah, Executive Director of the Ghana Integrity Initiative

Abstract

Corruption remains a significant impediment to sustainable development across Commonwealth Africa. Despite efforts by governmental institutions, progress has been slow. This paper argues that non-state actors play a crucial role in anti-corruption efforts and sustainable development. Drawing on academic literature and empirical evidence, it examines the effectiveness of non-state actors, such as civil society organisations, the media and the private sector, in promoting transparency and strengthening institutions. Through collaboration with governmental bodies and grassroots initiatives, non-state actors can drive change and foster a culture of accountability. By analysing case studies and best practices, this paper provides actionable recommendations for policy-makers, emphasising the need for inclusive governance structures and partnerships to combat corruption and achieve the Sustainable Development Goals in Commonwealth Africa.

On behalf of the organisers, I am honoured to be given the opportunity to deliver a paper at the 14th Conference and Annual General Meeting for Heads of Anti-Corruption Agencies in Commonwealth Africa on the topic: 'the crucial role of non-state actors in anti-corruption for sustainable development in Commonwealth Africa'.

Introduction/ background

Corruption remains a pervasive challenge in Commonwealth Africa, undermining efforts to achieve the Sustainable Development Goals (SDGs) and eroding public trust in governance institutions. Various surveys, including the Corruption Perception Index (CPI), have shown that very little progress has been made in the fight against corruption. For instance, a trend analysis of the CPI over 12 years.

While government agencies lead anti-corruption efforts, I submit that non-state actors (NSAs) play a crucial role in achieving the lasting progress we want. I attempt an exploration of the diverse landscape of NSAs in Commonwealth Africa that encompasses civil society organisations (CSOs), the media, private sector entities, religious groups and educational institutions – and their unique contributions to anti-corruption for sustainable development, particularly in alignment with Sustainable Development Goal (SDG) 16: Peace, Justice and Strong Institutions.

The United Nations Convention against Corruption (UNCAC) recognises the role of civil society in combatting corruption under Article 13, by calling on governments to increase transparency, improve public access to information and to promote public contributions to the government decision-making process. To actualise this, the UNODC has over the years, put in place interventions to build capacity and engagement of civil society, especially from developing countries, by delivering training to CSOs on UNCAC and its review mechanism. UNODC also supports CSO engagement in intergovernmental meetings and provides the necessary tools for them to work constructively with their governments and the private sector on UNCAC implementation. According to the UNODC, since early 2011, UNODC has trained more than 1,000 non-governmental organisations (NGOs) from around the world by providing them with the necessary tools to participate in the implementation of the UNCAC and the review mechanism of their own country. Through these training sessions, experts from UNODC and Transparency International equip participants with the requisite substantive expertise on UNCAC provisions, for them to contribute to the review of their country.

The African Union's Convention also presents the roles NSAs play in Articles 11 and 12, focusing on the private sector and civil society respectively. Finally, it is important to note that some countries who have signed up to the OGP, with some here present, appreciate the significant role civil society plays and therefore agree to work with civil society to promote transparency, accountability and citizens' participation utilising technology and innovation. Ghana is currently implementing its fifth national action plan, with CSOs playing a critical role. Also worth noting is the role of the SDGs in bringing all stakeholders together to promote sustainable development, in our case promoting peaceful, just and strong institutions. From the foregoing, governments across the globe appreciate NSAs in their governance arrangements.

The evolution of civil society across Commonwealth Africa

Civil society in Commonwealth Africa has undergone a significant evolution, marked by changes in its structure, functions and impact over time. Scholars such as Avina and Khan (2016) have observed this evolution, highlighting its transformative role in shaping governance, promoting social justice and fostering sustainable development across the region. Initially, civil society in many Commonwealth African countries emerged in response to colonial rule, serving primarily as a vehicle for nationalist movements and anti-colonial activism.

However, in the post-colonial era, civil society went through a period of diversification and expansion, with the proliferation of non-governmental organisations (NGOs), community-based groups, and advocacy networks (Bratton 2013). This diversification was driven by various factors, including democratisation processes, economic liberalisation, and the emergence of transnational issues such as HIV/AIDS and environmental degradation.

Throughout this evolution, civil society organisations (CSOs) in Commonwealth Africa have played increasingly prominent roles in advocating for human rights, promoting democratic governance and holding governments accountable (Bratton 2013). CSOs have become key actors in the policy-making process, providing expertise, mobilising public support and serving as watchdogs against abuses of power. It is important to also state that CSOs have adapted to changing socio-political contexts by leveraging new technologies, forging strategic partnerships, and adopting innovative approaches to advocacy and activism (Avina and Khan 2016).

Today, civil society in Commonwealth Africa continues to evolve in response to emerging challenges such as corruption, inequality and climate change. CSOs are increasingly engaged in multistakeholder initiatives, collaborative governance structures and transnational advocacy networks aimed at addressing these complex issues (Harrison 2018). Moreover, civil society is playing an instrumental role in promoting social cohesion, fostering dialogue between diverse communities, and building resilience in the face of political and economic uncertainty.

Who/what is civil society?

According to Josselin and Wallace (2001), civil society is a cornerstone of democratic societies, representing a vibrant space where individuals voluntarily organise to pursue common interests, advocate for social change, and engage with governmental and non-governmental actors. At its core, civil society is characterised by its autonomy, pluralism and capacity for collective action. According to Kaldor (2003), civil society comprises a broad spectrum of entities, including non-governmental organisations (NGOs), community-based groups, advocacy networks, trade unions, religious associations and philanthropic foundations.

One defining feature of civil society is its voluntarism, whereby individuals come together voluntarily to address shared concerns and advance common goals. Unlike state institutions, which are often characterised by formal hierarchies and bureaucratic structures, civil society organisations (CSOs) are typically characterised by their flexibility, adaptability and participatory ethos (Edwards, 2014). This voluntarism fosters a sense of ownership and empowerment among actors and stakeholders alike, enabling them to shape the direction and priorities of their collective endeavours. As Diamond (1999) notes, civil society provides a forum where individuals can express their interests, values and grievances, engage in dialogue with fellow citizens and decision-makers, and participate in the democratic process.

In terms of structure, civil society is characterised by its horizontal and decentralised nature, with power and authority dispersed among numerous actors and organisations. This decentralisation enables innovation, experimentation and bottom-up initiatives, as well as resilience in the face of external pressures or attempts at co-optation (Edwards, 2014).

The role of civil society organisations (CSOs) in combatting corruption in Ghana and across the Commonwealth

CSOs focused on combatting corruption do so through a range of proactive initiatives and activities. These efforts contribute significantly to fostering transparency, accountability and integrity in both the public and private sectors. Some of the areas of focus include the following.

- i. Research on governance issues such as the CPI, which has been mentioned here, and the Afrobarometer, exemplified by initiatives such as the Citizens Manifestos. These research endeavours provide valuable insights into the prevalence and impacts of corruption, informing evidence-based policy decisions.
- ii. Advocacy and awareness campaigns.

CSOs in Ghana and across the globe conduct robust advocacy campaigns to raise awareness regarding the detrimental effects of corruption on society. Through public dialogue, media campaigns and educational programmes, they mobilise public

support for anti-corruption efforts. Furthermore, CSOs advocate for anti-corruption laws, policies and regulatory reforms through research, engagements and public campaigns. Examples of these campaigns have included the following.

- The Domelovo Case: Leading civil society organisations, including the Ghana Integrity Initiative (GII), rallied behind Mr Daniel Yaw Domelovo, the former Auditor-General, when he faced undue pressure and attempts to remove him from office. The multidimensional advocacy, including public campaigns and legal interventions, culminated in a landmark Supreme Court ruling affirming the position of civil society. Although this ruling came late, it sets a precedent going forward.
- The Agyapa Royalties deal in Ghana is another significant example of civil society advocacy. The Agyapa deal involved the government's plan to monetise Ghana's gold royalties through a special purpose vehicle named Agyapa Royalties Limited, with the aim of raising funds for development projects. Civil society organisations like the Africa Centre for Energy Policy (ACEP), the Natural Resource Governance Institute and others raised concerns about transparency and corruption risks in the Agyapa Royalties deal. This advocacy led to intense scrutiny, parliamentary investigations and public pressure, resulting in the suspension of the deal by the government.

In response to concerns about the Agyapa Royalties deal, GII, Ghana Anti-Corruption Coalition (GACC) and Transparency International (TI) sought recourse by taking the matter to the ECOWAS Court. In this case, even though the case was not successful, it brought more attention to the issue.

- Occupy Ghana Movement. Through protests, petitions and legal actions, the movement successfully pressured the government to address issues such as corruption, inefficiency in public service delivery and the mismanagement of public resources. Success in interpreting the Surcharge and Disallowance Mandate in the Supreme Court ensured that the mandate was effectively implemented, leading to increased accountability and deterrence of financial misconduct in government institutions.
- Legislative reforms and policy influencing. Advocacy efforts have resulted in the passage of laws such as the Whistleblower Act, the Public Financial Management Act, the Right to Information Act and the Special Prosecutors Office Act, which have enhanced transparency, accountability in public financial management and citizen participation in governance processes.

Monitoring and tracking

GII, GACC, CDD-Ghana and SEND Ghana. Citizens groups monitor government infrastructural projects and service delivery at the local level. Their help promotes transparency and accountability through citizens' participation in governance at the district level.

ISODEC (Integrated Social Development Centre). The ISODEC monitors government spending on social programmes like education and healthcare.

Legal assistance and whistle-blower protection and support to whistle-blowers who expose corruption: GII's Advocacy and Legal Advice Centre (ALAC) offers free, confidential advice and support to victims and witnesses of corruption and provides a follow-up service to ensure they receive the redress they deserve. Since 2015, ALAC has supported more than 1,000 persons.

GII also has a mobile application ('Eye On Corruption') for stakeholders who wish to make complaints about the quality of services and corruption related to specific services.

Awareness raising, capacity building and training

Building citizens groups – SAC, LaNETs, DCMCs etc. Citizens' groups can be formed and trained to monitor public services, infrastructure projects and resource allocation. This fosters transparency and empowers communities to hold officials accountable.

Educating citizens on their rights and responsibilities as stipulated in the NACAP. This includes assisting citizens and the public to understand anti-corruption laws, budgeting processes and their right to information as 'knowledge is power' in the fight against corruption.

Utilising online platforms for reporting and information sharing. CSOs are providing mobile apps, social media and online forums that can empower citizen communication and collaboration. For example, GII's ALAC and Eye on Corruption platforms for corruption reporting

Empowering whistle-blowers. That is, promoting safe spaces for people to report corruption without fear of reprisal. Community hotlines, anonymous reporting systems and legal support structures are crucial.

Combatting misinformation and disinformation campaigns. Equipping communities with media literacy skills is crucial to identify and counter false narratives that might protect corrupt practices.

Recognising and rewarding community leaders who fight corruption. Awards schemes, such as GIAWARDS, and other opportunities create incentives for continued community action.

Collaboration and networking

The way forward

Fighting corruption requires a holistic and multidimensional approach that acknowledges the critical role of civil society in driving change and promoting sustainable development. While progress has been made in various initiatives, such as the implementation of National Anti-Corruption Action Plans (NACAPs), there are several key areas where further action is needed to harness the power of civil society in combatting corruption and fostering sustainable development.

Civil society relies on sustained financial support to sustain its advocacy efforts and implement anti-corruption initiatives effectively. Governments and international donors must prioritise allocating resources to support the capacity-building and operational needs of CSOs. By investing in civil society organisations, policy-makers demonstrate their commitment to promoting transparency, accountability and sustainable development. Moreover, financial support for civil society strengthens democratic governance and fosters inclusive decision-making processes.

Conclusion

In conclusion, civil society plays a critical role in driving anti-corruption efforts and promoting sustainable development in Commonwealth Africa. By actively engaging citizens, advocating for policy reforms, and fostering partnerships with governmental institutions and international actors, civil society organisations contribute to building

resilient societies that prioritise integrity, transparency and accountability. Therefore, future anti-corruption strategies should prioritise empowering civil society and leveraging its transformative potential to achieve lasting change and sustainable development outcomes.

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Annex 32. Strategies for overcoming corruption challenges in Africa

Dr Roger Koranteng, Head, Public Sector Governance,
Commonwealth Secretariat, UK

Rumpere

- The term “corruption” derives from the Latin word “rumpere” (to break).
- It implies that a rule, a principle, or something like a code of conduct is broken.
- Therefore, corruption is a deviation from accepted and desirable behaviour, or code of conduct.
- It is often thought to be associated with the public sector but there are growing areas of corruption in the private sector.

Attitudes Towards corruption

- Attitudes towards corruption vary from country to country, and from time to time.
- There were times (and countries) when corruption was considered as almost natural, inevitable phenomenon.
- Now, it is assumed to have negative consequences for economic growth, for equity, and for democracies.
- It remains prevalent and seems to have even increased.

It was too Sensitive

- In the 70s and 80s – not much was spoken about it by development/international institutions – it was too sensitive.
- During the 1990s, the governments of several important countries (Italy, Japan, Brazil, others) fell because of corruption.
- Corruption was always cited as one of the reasons for military coups in Africa in the 1970s and 80s.
- Some governments and international organisations like the World Bank started to react to corruption in the 1990s onwards.
- Various surveys indicated that political parties, parliaments, and public institutions such as Police, Customs, Revenue, and Immigration services were some institutions most exposed to corruption.

Attitudes toward Corruption

- In 1990s, attitudes toward corruption became more negative, perhaps because of the impact of the so-called “Washington Consensus”
- Corruption started to be called a “menace” to democracy and to market economies.
- Suddenly, there was less political tolerance for it and much more attention paid to corruption than in earlier years.
- Because of the role of U.S. government, the World bank, the IMF, and other international institutions.

Type of Corruption

- Types of Corruption include Grand corruption – involves huge sums paid by major businesses to politically exposed persons and/or government officials, called it Kickbacks, 10% 15% or 20%.
- Systemic corruption – takes the form of endemic bribes paid to public officials to obtain licenses, permits, or to by-pass regulations.
- Petty corruption – involves modest but recurring payments to avoid delays, jump queues, or obtain goods and services.

Types of Corruption

- Corruption and cronyism: The cronies and family members which benefit from the fruits of corruption encourage it.
- To them, an office holder who does not deliver the benefits is often thought of as weak, foolish or at best naive.
- The problem of corruption and of the expectation of the cronies and members of family were also seen as tied to the problems of poverty and the role of a public officer as a provider to family members and friends.
- Since public office holders often do not have enough of their own to give, the temptation to misappropriate public resources may be irresistible.

Cost of Corruption

- While we tend to think of corruption in purely monetary terms, the truth is that it costs us the quality of our lives – our human and national development.
- Looking at corruption as an economic issue means that corruption is more than simply a wrong behaviour.
- It means that corruption, while benefiting a few individuals, is costly to society, the private sector, and governments in the long run.

Cost of Corruption

- Corruption must be rooted out because it:
 - Increases public spending
 - Lowers productivity and discourages innovation
 - Increases costs of doing business (serves as a tax on business)
 - Lowers growth levels
 - Lowers private sector employment levels
 - Reduces the number of quality public sector jobs
 - Exacerbates poverty and inequality
 - Undermines the rule of law
 - Hinders democratic, market-oriented reforms
 - Increases political instability
 - Contributes to high crime rates

Epidemic of Corruption

- In Africa, the epidemic of corruption is spreading rapidly in all fields and departments.
- Contractors and builders are constructing weak and low standard roads, bridges, and houses.
- Businessmen and women and traders are engaged in overcharging, adulteration, and underweighting.
- Government officials take bribe for doing or sanctioning any work or contracts.
- Corruption is rife in the public sector, private sector, civil society institutions, religious places, media, chieftaincy, informal sector and from our streets to boardrooms.
- Hence, it has become biggest threat to the social and economic development of our dear country.

Epidemic of Corruption

- In Africa, one of the areas that seriously affect businesses is the bad behaviour or unprofessional attitude of majority of workers which collapse and destroy businesses.
- Most business owners in Africa all complain about low quality of work done, laziness, lying, stealing and corruption amongst the workforces.
- The public sector is not different, lying, stealing, low work performance, absenteeism and on top of this all, corruption.

Negative Mentality and Attitude Towards Work

- With this type of mentality and attitude towards work, developing our continent will be a difficult task, for this and future generation.
- Calculating what the business community is losing in its attempts to protect their businesses against stealing, mismanagement, and corruption doubles labour costs.
- This is impacting negatively on attracting investment and doing business in our country.

Negative Mentality and Attitude Towards Work

- I hope this our conference will trigger open-minded discussions so we can all think about ways to tackle this problem, not only through ethical education
- but also through changing mindset of our youth and training them in ways that hard work pays eventually than getting rich quickly through unethical means .

Strategies for overcoming corruption challenges

Some strategies and legal measures to combat corruption

Declaration of Assets

- Declaration of assets and liabilities by public officials particularly, **before and after** their tenure in office, be made compulsory and verifiable as a major step in ensuring probity in public life.
- It must include their outside activities, employment, investments, assets and substantial gifts or benefits.
- Such disclosures allow public employees' wealth to be monitored.
- Let us note that **ASSET DECLARATION WITHOUT VERIFICATION DOES NOT TACKLE CORRUPTION.**

Beneficial Ownership Register

- A beneficial owner is defined as the natural person(s) who ultimately owns or controls a someone fronting for him/her, and/or the natural person on whose behalf a transaction is being conducted.
- It also includes those persons who exercise ultimate effective control over a legal person or arrangement.
- Because anonymity enables many illegal activities, such as tax evasion, corruption, money laundering, and stolen asset, to take place out of the view of law enforcement authorities.

Reversing the Burden of Proof

- Reversing the burden of proof in corruption court cases.
- The proposition would place the burden of proof on the person pursued for corruption to prove his innocence, and not on the Anti-Corruption Institution, contrary to the current prevailing principle in corruption cases.

Conclusion

- Addressing corruption is a multifaceted endeavour that requires a combination of legal, institutional, and societal approaches.
- Effective law enforcement is crucial to ensure that corrupt individuals face consequences for their actions.
- A strong legal framework, independent courts, and law enforcement agencies are essential to ending this Impunity.

Annex 33. Engaging civil society in the fight against corruption

Hady Fink, Partnership for Transparency Europe

Civil society (CS) is a critical stakeholder in national anti-corruption (AC) efforts, capable of significantly contributing to the success of anti-corruption agencies (ACAs). Despite this, its potential remains underutilised. Partnership for Transparency (PTF) offers strategic support to ACAs, helping them effectively engage civil society in the fight against corruption.

Key contributions of civil society

Civil society plays various roles in national AC efforts. It can provide research, policy analysis and outreach to enhance transparency and accountability. Third-party monitoring, a crucial pillar of AC efforts, enables independent verification of projects and activities across procurement, implementation and budget cycles. Successful examples of such initiatives include reducing teacher absenteeism in Ghana and improving public procurement integrity in Moldova.

At the local level, civil society increases competence in monitoring, transparency and accountability, while ensuring better service delivery and value for money. Nationally, it contributes to ACA programmes by enhancing monitoring infrastructure, informing policy decisions, and providing valuable data for drafting laws and strategies.

Opportunities and challenges

While civil society offers expertise, networks and community access, challenges remain, including issues of reliability, independence and differing agendas. ACAs must navigate these risks to build effective partnerships with civil society organisations (CSOs).

The role of Partnership for Transparency (PTF)

PTF, an international CSO with headquarters in Washington, DC and affiliates in Europe and Asia, has collaborated with over 160 local CSOs on more than 285 projects in 55 countries. Volunteer-driven, it specialises in fighting corruption, strengthening transparency and enhancing accountability. PTF offers capacity building, strategic advice and technical expertise, serving as a mediator and partner to ACAs.

Key messages

Civil society is a valuable resource that can bolster national AC efforts. ACAs should leverage its expertise and networks to enhance their impact. PTF stands ready to support ACAs by providing tailored solutions for engaging civil society effectively.

Annex 34. Mandate and achievements

High Authority for Preventing and Fighting Corruption and Related Offences

Introduction

Togo's High Authority for Preventing and Fighting Corruption and Related Offences (HAPLUCIA) was established by the Law No. 2015-006 of 28 July 2015 and is mandated to promote and strengthen prevention and the fight against corruption and related offences throughout the administration, including private or public establishments, enterprises and non-governmental organisations.

Attributes

The HAPLUCIA is mandated with a variety of responsibilities to prevent corruption in Togo. First, HAPLUCIA works to ensure that training and compliance actions are implemented throughout the public sector. This includes providing policy manuals, codes of ethics and training on public procurement procedures. HAPLUCIA also works to evaluate legal instruments and administrative measures to identify areas for improvement.

Also, HAPLUCIA promotes a governance system that prevents corruption. This includes measures to prevent conflicts of interest, illicit enrichment and other corrupt acts. HAPLUCIA also disseminates information and good practices related to corruption prevention. Additionally, it co-operates with relevant judicial authorities.

Finally, HAPLUCIA has the authority to receive complaints and conduct preliminary investigations into corruption. After this preliminary investigation, HAPLUCIA can refer cases to the Prosecutor for further investigation by law enforcement agencies.

Achievements

Prevention

- The National Campaign for Elected Officials and Municipal Officials. More than 1,600 participants were trained on good governance, transparency and anti-corruption measures. Learned that officials support anti-corruption efforts and there is a need for wider outreach.
- The National Public Speaking Competition (ORATHON): Engaged over 600 students to raise awareness +.
- Other activities included meetings and workshops with various groups, including court presidents, journalists, health officials, law enforcement agencies and border officials.

Investigation

- HAPLUCIA receives complaints and investigates them. Many complaints are unrelated to corruption and are referred to other authorities.

Co-operation

- National level. Established a Co-ordination Committee to unite stakeholders in the fight against corruption. Co-operates with judicial actors.
- International level. Co-operates with regional and international organisations like ECOWAS, UNODC, GIS, the Commonwealth Secretariat and Botswana's Anti-Corruption Centre.

Main challenges

The challenges HAPLUCIA faces include an unapproved national anti-corruption strategy (the National Strategy for Preventing and Fighting Corruption and Related Offences), which was validated in October 2022, limited resources for investigations, and a lack of whistle-blower protections.

Perspectives

This presentation proposes the establishment of a new anti-corruption institution: the High Authority for Transparency, Integrity in Public Life and the Fight against Corruption (HA). This body, created under Article 83 of the new Togolese Constitution, has three key mandates.

First, the HA will be responsible for promoting ethical conduct and setting a good example for public officials. Second, it will receive declarations of assets and interests from public officials. Finally, public officials can consult the HA on issues of ethics and conflicts of interest related to their work.

The advantages of the HA include the sustainability of the institution, the expansion of its mandate to include asset declarations, and the potential for an organic law to grant it investigative powers.

Recommendations

These include the following.

1. The updating and adoption of the National Strategy for Preventing and Fighting Corruption and Related Offences, along with its implementation. This should make it possible to meet all the challenges highlighted above.
2. The adoption of a new organic law, so as to give the new institution investigative powers and enable it to fight effectively against corruption and related offences.
3. Adoption of a framework law on the prevention and fight against corruption to protect whistle-blowers and other stakeholders.
4. Introduction of anti-corruption education in teaching and training curricula.
5. The provision of adequate financial resources to HAPLUCIA.

Conclusion

The creation of the HAPLUCIA is a positive step forward towards addressing corruption cases. The fight against corruption requires co-operation between national and international actors, and this conference has provided a valuable opportunity for Togo to engage with partners on this critical issue.

Annex 35. Role of the Office of the Ombudsman

Office of the Ombudsman of Rwanda

Introduction

The Office of the Ombudsman is an independent public institution established in 2003 by the Constitution of the Republic of Rwanda in its Article 140. It is governed by Law No. 54/2021 of 29/08/2021. The Office of The Ombudsman submits its annual report to the President of the Republic and to parliament, both chambers. The Office of the Ombudsman is a hybrid institution: it fulfils the ombudsman role, is an anti-corruption agency and covers declaration of assets.

Mandate

Its mandate includes: to prevent and fight injustice and corruption; to instil in Rwandans values that consist of resisting, preventing, avoiding and fighting injustice and corruption; to review and decide on injustice and corruption complaints that are not resolved by relevant organs; to receive and verify asset declarations; to advise the government on the establishment and promotion of policies and strategies to prevent, fight and punish injustice and corruption; to monitor the implementation of policies and strategies aimed at preventing and fighting injustice and corruption; and to establish contacts and co-operate with regional and international institutions having similar responsibilities.

Innovative work or initiatives implemented

The Office of the Ombudsman has established anti-corruption committees in the public and private sectors to monitor its activities. The establishment of these anti-corruption committees was created in accordance with Article 3 of Law No. 54/2018 of 13/08/2018.

It has organised anti-corruption campaigns in public and private secondary schools. To achieve its mission to instil in Rwandans values that consist of resisting, preventing, avoiding and fighting injustice and corruption (Article 4, clause 20 of the Law governing the Office of the Ombudsman), the Office of the Ombudsman organises programmes for students in secondary schools.

It also organises anti-corruption and anti-injustice mobilisation through media and billboards. This is done through sports publicity, radio dramas, weekly talk shows and billboards. There is collaboration of national institutions through the National Advisory for the fight against injustice and corruption at the national and grassroots levels. The Office of the Ombudsman co-ordinates and monitors all activities of the Advisory Council for the fight against injustice and corruption from the national to decentralised entities levels (City of Kigali, district and sector levels).

Imprescriptibility of corruption (non-prescription of offences). The offence of corruption has become imprescriptible, as provided by Article 21 of Law No. 54/2018 of 13/08/2018 on fighting against corruption. There is exemption from criminal

liability for corruption – so there is no criminal liability for a person who gives or receives an illegal benefit and informs the justice organs before the commencement of criminal investigation by providing information and evidence. This is provided in Article 19 of the Law No. 54/2018 of 13/08/2018 on fighting against corruption.

Challenges

The Office of the Ombudsman faces challenges in the bid to implement these initiatives. These challenges include the low reporting of corruption; and the lack of an active civil society and private sector in combatting corruption.

Successes

One success is that all categories of Rwandans are informed on how to prevent, avoid and fight against injustice and corruption. They are conscious of the evil of corruption and its negative impact on the development of their country. The laws and regulations are easily understood by everyone. Because of thorough education, the proper creation of awareness and the consistent organisation of activities by the anti-corruption committee, Rwandans have become highly committed to fight against corruption.

Recommendations

It is important that an effort is put into education and making it a reality that each sector of the population is aware of the advantages of fighting corruption. Another recommendation is to promote the culture of transparency and integrity. The Office of the Ombudsman will continue to put more efforts on prevention rather than enforcement and promoting good service delivery and national values in corruption prevention.

Annex 36. Strengthening institutions and promoting transparency

**Youssoupha Ndiaye, Principal Integrity Officer,
African Development Bank, Ivory Coast**

Strengthening institutions and promoting transparency remain central to the efforts of the African Development Bank (AfDB) in addressing corruption across the continent. Insights from the Corruption Perceptions Index (CPI) 2023 reveal a concerning picture: 49 out of 54 regional member countries (RMCs) assessed scored below 50, with the regional average stagnating at a mere 33 out of 100. While a few countries have made gains, these are overshadowed by declines in others, and many nations show no progress or have regressed compared to previous years. This underscores the critical need for sustained efforts in combatting corruption and improving governance.

The AfDB ('the Bank') recognises the multifaceted impacts of corruption, including its economic costs, erosion of political trust, diminished quality of public services, exacerbation of social inequality and the undermining of the rule of law. Corruption also hampers environmental sustainability and impedes the effective use of financial resources allocated for development projects. The Bank views the fight against corruption as a moral imperative, essential for poverty alleviation and improving living standards across Africa. Furthermore, tackling corruption is integral to achieving sustainable economic, social and environmental development – as outlined in the Sustainable Development Goals (SDGs). By addressing corruption, the AfDB strengthens its institutional integrity, enhances the credibility of its operations, and contributes to political and economic stability within its member countries.

To combat corruption, the AfDB employs various policies, strategies and action plans, such as the Bank Group Strategy for Economic Governance in Africa (SEGA) 2021–2025. Key interventions include strengthening institutional capacities, providing assistance to regional member countries, and building the capabilities of staff and oversight bodies. The Bank supports the recovery of assets, advocates for civil society engagement and assists in the establishment of regulatory frameworks. These efforts extend to national anti-corruption agencies, regional anti-corruption associations and broader governance frameworks. AfDB interventions are tailored to operate at the country, sector and regional levels, with modes of support including grants and loans. These interventions are demand-driven, emphasising country ownership, continuous engagement, responsiveness to local needs and transparent processes. Collaborative efforts with development partners further enhance the impact of these programmes.

The AfDB's country-level initiatives demonstrate its commitment to addressing corruption through tailored support. In the Ivory Coast, the Bank supported the development of a National Anti-Corruption Strategy and updates to the anti-

corruption legal framework. In Mali, it provided institutional support for economic governance, which included bolstering national anti-corruption efforts. In South Sudan, plans are underway to train and reinforce the capacities of the anti-corruption agency. In Egypt, the Bank strengthened the Administrative Control Agency's capacity by improving case management, advocacy, training, benchmarking and experience sharing.

Transparency is a cornerstone of the AfDB's approach. The Bank ensures the public disclosure of funding and project documents on its website and consistently receives high ratings on the Global Aid Transparency Index. It also publishes information on ultimate beneficial ownership and sanctions decisions, demonstrating a commitment to accountability. These transparency measures align with the Bank's overarching mission to foster governance reforms and sustainable development across Africa.

The African Development Bank's efforts to address corruption are rooted in collaboration, country-specific needs and a commitment to making a tangible impact. By promoting transparency, strengthening institutions and engaging with stakeholders, the AfDB continues to play a pivotal role in enhancing governance and advancing sustainable development in Africa.

Annex 37. The Anti-Corruption Bureau

Mrs Martha Chizuma, Director-General, Anti-Corruption Bureau, Malawi

Introduction and Background

The Anti-Corruption Bureau (ACB) is a government department established by law under Corrupt Practices Act (CPA) of 1995 to be the lead institution in the fight against corruption in Malawi. The ACB is mandated in Section 10 of the CPA to take necessary measures for the prevention of corruption; receive complaints, reports of any alleged or suspected corrupt offence, investigate any alleged complaint or report and to prosecute any offence under the CPA.

The Bureau has four operational divisions that fulfil these functions, and these are the Corruption Prevention department, the Public Education department, the Investigations department and the Prosecutions department. Corruption Prevention and Public Education Departments fulfil the corruption Prevention mandate while investigations and prosecutions are the law enforcement sections of the Bureau.

In 2023, ACB celebrated 25 years of existence in the fight against corruption. This is a huge milestone as the corruption fight continues.

Innovative Work and Initiatives Implemented by the ACB in 2023–2024

The ACB continues to lead the fight against corruption in Malawi and in the financial year 2023–2024 there were various initiatives and innovations that the Bureau implemented under both corruption prevention and law enforcement mandates. The following are some of the initiatives that the ACB championed in the fight against corruption.

1. The launch of Malawi Integrity Anthem

The Anti-Corruption Bureau, in its efforts to implement Malawi's National Anti-Corruption Strategy II, launched the first ever integrity anthem contextualized locally as **Umunthu Anthem**. The Anthem calls on all the citizens of Malawi to be patriotic, embrace integrity and in unison advance the fight against corruption in Malawi, leading to improved governance, service delivery and welfare of the citizens. It also adopts the spirit advanced by the Malawi Vision 2063 (MW2063) especially the call for mindset change. This anthem therefore complements the Malawi National Anthem, in the long run directly addressing the prevailing problems of corruption and erosion of moral values. The anthem is sung at anti-corruption public events.

Objectives of the Integrity Anthem

1. Discourage a culture of corruption through bribery, nepotism, and similar vices.
2. Create responsible citizenship to refuse and report corruption.

3. Promote patriotism among citizens for a positive national image.
4. Promote mindset change among citizens.

Challenges

1. Limited funds to implement sensitizations for disseminating and popularizing the Integrity Anthem.
2. Lack of adoption of the Integrity Anthem by the Office of the President and Cabinet. This would help to give a policy direction so that it can be used in government functions and meetings.

Results of the innovation

There has been an overwhelming response from the public. The anthem is being sung at most national events, Institutional Integrity Committees functions, graduation ceremonies and ACB organized events.

Reflections and lesson learnt.

An anthem is one of the most cost-effective strategies for reminding citizens from all walks of life about the need for being patriotic and observe highest standards of integrity.

Recommendations

1. Use the existing platforms, meetings, structures, and media platforms to disseminate the Integrity Anthem.
2. Engage government officials particularly Office of the President and Cabinet to give a policy direction that can be used in government functions and meetings.
3. ACB to utilise national surveys done by the National Statistics Office (NSO) to get feedback and measure success.

2. Development and Launch of the Anti-Corruption Sourcebook

In 2023, the ACB developed and launched a sourcebook for primary schools titled *Teaching Values for a Corruption-free Malawi*. The sourcebook is designed to complement existing topics in the curriculum, thereby ensuring that themes of corruption and integrity are integrated into primary education curriculum.

Objectives

1. To inform the next primary school curriculum review so that issues of corruption and integrity are incorporated at the right scope and depth across the learning areas.
2. To provide guidance to teachers to introduce primary school learners to the concept of corruption and the importance of preventing and countering corruption.
3. To provide teachers with resources to instill values and attitudes in young people conducive to becoming responsible citizens and fighters of corruption.

Results of the innovation

1. More people understand and value the inculcation of anti-corruption (Umunthu) values as crucial not only in the anti-corruption drive, but in bringing back the values for the generation that has 'lost it' due to the coming in of human rights issues.

2. Increased partnership with the donor community. Donor partners such as UNDP and GIZ who are currently supporting training activities and workshops preparing teachers to effectively use the book.
3. Increased awareness about the book as almost all Tutors in all the Teacher Training Colleges in Malawi, all Primary School Education Advisors (PEAs), and teachers from Demonstration Primary School teachers have been trained in using the book.
4. This has led to the review of the Secondary school and tertiary curriculum to include corruption in the syllabus.
5. Integrating the Sourcebook into the national education curriculum through the Curriculum Review and Assessment process currently being facilitated by the Malawi Institute of Education and Ministry of Education.

Challenges

1. Scaling up the initiative would need more resources for both training of teachers and production of more copies.
2. Limited number of copies were printed hence it is not accessible to all teachers.
3. A robust system for monitoring and evaluating the sourcebook's impact would demand more resources.

Reflections

1. The need for collaboration with other stakeholders such as local structures, government ministries, and development partners to ensure there is buy in.
2. To ensure success, several key actions and responsibilities should be coordinated among various stakeholders.

Recommendations

1. Stakeholders should engage in this process to regularly assess students' understanding of anti-corruption concepts, measure the initiative's impact and make necessary adjustments and improvements based on feedback and data.

3. Whistle Blower Protection Legislation

The Anti-Corruption Bureau has initiated development of the Whistle Blowers Protection Legislation. The Bureau made a Submission to the Law Commission to develop legislation to protect the whistle blowers. ACB sourced funding to support development of this legislation from international organisations like the Chandler Foundation and United Nations Development Partners (UNDP). The process is at an advanced stage and the Bureau hopes once the legislation is developed more people will feel free to report corruption and other crimes to law enforcement agencies.

Objective

1. To offer protection to whistleblowers who want to report all kind of crimes to law enforcement agencies (ACB) including corruption and financial crimes.

Challenges

Passing and enactment of the Act may take a long time since legislation formulation involves a lot of stakeholders like government agents /units and parliament to pass the law.

Availability of finances as the legislation development is funded by donors.

Results of the whistleblower protection

2. Increased number of complaints reported by whistle blowers.
3. Protection for all whistle blowers who report corruption crimes and all other related crimes to LEAs.

Recommendations

Engaging civil society organisations and central government pillars to lobby for fast tracking of the enactment of the Whistleblowers' Act.

Engage more donor partners for funding of the development of the law.

Investigations and Prosecution

ACB continues the fight against corruption by investigating and prosecuting corruption especially involving high profile individuals. In 2022/23, the ACB established a team within the investigations department that solely concentrates on asset recovery using both conviction-based and non-conviction based asset forfeiture. This is to ensure that criminals do not enjoy the proceeds of crime.

Update of cases in the ACB

High profile cases involving Zuneth Sattar, and all the people connected with him has made significant progress. The Vice President's case has exhausted all technicalities and will be coming for hearing very shortly.

The ACB has closed its case for Mr Reynek Matemba, the former solicitor general, the case is waiting for ruling on whether he has a case to answer or not.

The ACB has finalised forfeiture hearing for the eleven preserved properties and is waiting for judgement.

ACB has forfeited a house in area 43, Lilongwe belonging to Mr Paul Mphwinyo who was answering corruption charges related to Cash gate. Mr Mphwinyo absconded bail since June 2023.

The Bureau together with other Law Enforcement Agencies (LEAs) is in the process of developing a lifestyle audit manual for the country. This manual is an accountability tool that is crucial in the fight against financial crimes including corruption. The development process of the manual has passed the cabinet committee level and is now at full cabinet level.

Challenges

It is difficult to prosecute politically exposed persons since corruption fights back.

Results of Innovation

Change in the public perception.

Reflections and lessons learned

There is a need for political support to fight corruption.

4. Monitoring of Service Delivery including infrastructure Projects

One goal of the NACS II is to improve public service delivery both in terms of quality and accessibility. Towards the attainment of this goal, ACB partnered with some

other government institutions to monitor service delivery. Of notable mention is the monitoring of major infrastructure projects like roads construction being undertaken by government. The Bureau jointly did the exercise with the National Construction Industry Council (NCIC).

Objectives

1. Promote efficiency of public institutions.
2. Enhance public trust in institutions.
3. Evaluate adherence to contract provisions and national construction industry regulations.
4. Report serious concerns about and provide on-the-spot recommendations for quality of public service delivery.

Challenges

1. Laxity in complying with recommendations based on reasons, either due to policy or mandate implications.
2. Duplication of frontline monitoring by different national departments and agencies creates reporting fatigue by monitored institutions and results in malicious compliance.

Results

1. The ACB aims to identify and address any instances of malpractice, inefficiency, or corruption that may undermine the quality and accessibility of public services.
2. Enhanced works progress in the construction of the M1 road.
3. Improved adherence to contract provisions and national construction industry regulations.
4. Enhance stronger working relationship among stakeholders.

Reflections and lessons learned

1. Adequate resources are very important when implementing big projects.
2. Government support is very critical for projects successes.

Recommendations

1. Regular monitoring of projects is paramount for projects success.
2. Operating collaboratively with other related agencies will facilitate better use of available resources to reach and achieve the developmental goals.

5. Development of Access to Information (ATI) Manual

In its quest to fight against corruption and maintain transparency in its work to the people of Malawi, the ACB has developed an information manual to guide the citizens on how they can access information from the ACB. This follows the passing of the Access to Information Act (ATIA) of 2017 which became operational in 2020 to provide the right of access to information in the custody of public bodies and relevant public bodies. The ACB believes that promoting access to information is one of the effective ways of dealing with corruption. The information manual is designed to ensure that there is consistency in the provision of information by the ACB to

information seekers. ACB was awarded a certificate by the Minister of Information for being very compliant with ATI law.

Objectives

1. To guide the citizens on how they can access information from the ACB.
2. To clarify the kind and categories of information that citizens can access from the ACB.

Challenges

1. Some citizens request restricted information from the bureau.
2. Some citizens request information with the aim of abusing the acquired information.

Results of Innovation

1. Clear guidelines on how to request information from the ACB.
2. Clear guidelines on what information can be requested from the Bureau.

Reflections and Lessons Learned

Management support is crucial to the success of providing information in ATIA.

Recommendations

1. There is a need for civic education on the roles of citizens in getting access to information and what kind of information can be accessed from the ACB.

Annex 38. Combatting corruption in Ghana: Key anti-corruption interventions

Mercy Larbi, Deputy Commissioner, Commission on Human Rights and Administrative Justice

Combatting corruption in Ghana remains a critical focus for the Commission on Human Rights and Administrative Justice (CHRAJ). Since 2014, Ghana has implemented the National Anti-Corruption Action Plan (NACAP) as its national strategy to combat corruption over a ten-year period. NACAP emphasises a strong partnership between the public sector, private sector and civil society and adopts a three-pronged approach: education and capacity building, prevention, and investigations and enforcement. Its strategic objectives aim to build public capacity to condemn and fight corruption, institutionalise efficiency, accountability, and transparency across all sectors, engage individuals and organisations in reporting and combatting corruption, and conduct effective investigations and prosecutions of corrupt activities.

The implementation of NACAP spans a decade and is structured into short-term, medium-term and long-term goals. The High-Level Implementation Committee (HiLIC) oversees the process, supported by the Monitoring Committee (MONICOM), CHRAJ and other implementing partners. Notable outcomes include increased education efforts, with over 7,000 programmes conducted in 2022 alone, leading to a rise in reported cases, such as the 284 instances of non-compliance with Chapter 24 of the 1992 Constitution. Key legislative reforms, including amendments to the Companies Act, Contracts Act and Whistleblower Act, have enhanced integrity mechanisms. Digitisation initiatives have introduced safe reporting channels such as hotlines and confidential online reporting platforms.

Ghana's anti-corruption interventions also include developing a Key Accountability Institution (KAI) Forum Action Plan, focusing on capacity building, joint investigations, resource mobilisation and community awareness raising. Standard operating procedures (SOPs) for whistle-blower protection and corruption risk assessments in the fisheries and health sectors have been introduced with support from the UNODC. Corruption risk mitigation strategies are being implemented in the Ghana Health Service and the Ministry of Fisheries and Aquaculture Development, along with the establishment of integrity committees to promote transparency and accountability.

In 2021, Ghana launched the National Cultural Review (NCR) and School Integrity Project (SIP) to address challenges in societal values and inculcate integrity, discipline and patriotism in the younger generation. These initiatives aim to embed ethical values at all levels of education and build a culture of integrity across Ghanaian society. Currently, an independent evaluation of NACAP is underway, supported by the UNODC. The evaluation examines the context, development and implementation of NACAP, covering the period from 2009 to 2024. It aims to assess

the plan's achievements, identify lessons learned and provide a basis for developing NACAP II. The evaluation process is scientifically rigorous and ensures independence, impartiality and stakeholder participation.

Despite progress, challenges remain. These include insufficient funding for NACAP, a reluctance among citizens to report corruption, a lack of political will, and delays in passing key legislation such as the Conduct of Public Officers Bill, 2022. Some implementing partners have also been slow to execute and report on NACAP activities. To address these challenges, recommendations include implementing a NACAP communication strategy, introducing a sanctions regime to hold non-compliant partners accountable and prioritising key anti-corruption legislation. Awareness-raising campaigns and training for implementing partners, along with grassroots media engagement in local languages, are essential to enhance public awareness and participation.

Further recommendations emphasise strengthening the financial sector against corruption, advancing the Schools Integrity Project (SIP) and the National Cultural Review Programme (NCRP), and developing sectoral action plans. Engaging civil society organisations, the media, private sector groups and faith-based organisations will also reinforce collective efforts in the fight against corruption. Looking ahead, NACAP II envisions continued collaboration across Africa through virtual training and shared experiences facilitated by the Commonwealth Africa Anti-Corruption Centre. Combatting corruption requires sustained co-operation, transparency and the collective commitment of all stakeholders.

Annex 39. Initiatives implemented by the ICPC in the fight against corruption in Nigeria

Independent Corrupt Practices and Other Related Offences Commission (ICPC)

The Independent Corrupt Practices and Other Related Offences Commission (ICPC) of Nigeria has implemented several innovative initiatives to combat corruption. This paper outlines these initiatives and their impact.

One of the recent initiatives is the Digital Transformation Initiative, which addresses challenges such as infrastructural deficits, skills gaps, data accuracy, cybersecurity threats and citizen engagement. The initiative has improved data integrity, enhanced transparency and bolstered accountability. To further strengthen the initiative, recommendations include fostering multi-agency collaboration, conducting routine organisational reforms and enhancing digital skills across relevant agencies.

The Constituency and Executive Projects Tracking Initiative (CEPTI) aims to ensure the quality execution and delivery of publicly funded projects. Despite challenges like inadequate human and material resources, insufficient funds, and a lack of supervisory skill sets and tools, CEPTI has yielded notable results. These include better project execution, improved delivery methods, and increased collaboration between the ICPC and ministries, departments, and agencies. Recommendations to enhance CEPTI include recruiting additional personnel, establishing a dedicated secretariat and providing more operational vehicles.

The ICPC has also launched the Sexual Harassment and Abuse Response Team (SHART) to tackle the endemic issue of sexual harassment in academic institutions. Challenges such as the culture of silence, societal norms, poor institutional responses and a lack of awareness were identified. SHART's efforts have resulted in criminal prosecutions of offenders and increased awareness in educational environments. Lessons learned highlight the prevalence of sexual harassment, where offenders exploit vulnerable students and staff, often seeking sexual gratification in exchange for favourable grades. Recommendations for SHART include training judges and judicial officials, establishing safe houses for survivors, and providing specialised training for sexual harassment response teams.

These initiatives have significantly enhanced the ICPC's visibility and impact. By leveraging technology to modernise its operational framework, ensuring value for money in publicly funded projects, and increasing awareness against sexual harassment in educational institutions, the ICPC continues to lead the fight against corruption in Nigeria.

Annex 40. Innovative initiatives in the fight against corruption in Cameroon

Rev. Dr Dieudonné Massi Gams, Chairman of the National Anti-Corruption Commission of Cameroon

Introduction

The National Anti-Corruption Commission of Cameroon (CONAC) is an independent public body created by a Presidential Decree on 11 March 2006. Its principal mission is to *contribute* to the fight against corruption.

Intervention tools

The use of the Rapid Results Initiative (RRI) involves the concomitant use of actions of Prevention, Education, Condition, Incentives and Sanctions to identify and clear corruption niches in a structure within 100 days. An Action through Rapid Intervention (ARI), it seeks to unmask ongoing acts of corruption, arrest the perpetrators and hand them over for prosecution. It also engages in sector-oriented anti-corruption campaigns. Its essence is to educate and mobilise actors in specific sectors to resist corruption and promote integrity (sectors: cocoa, coffee, cotton, forestry, education, youth, women). Through Anti-Corruption Caravans, it mobilises the population to stand up against corruption. There is also the Corruption-free Competitive Entrance Examination (COSCO) – its motto is: justice, transparency and equity in public competitive examinations.

CONAC holds radio and television productions to educate, inform and build awareness among the public on the dangers of corruption, how to combat corruption, as well as a daily press review to ensure follow-up of denunciations of acts of corruption and assimilated offences made through the press and CONAC. There is a newsletter meant to review activities of the Commission; and an annual report – which presents the state of the fight against corruption in Cameroon, including actions, results and prospects.

Anti-Corruption Clinic

The main objective of the Anti-Corruption Clinic is to delocalise part of the operational services of CONAC to a region for a week, to receive and process accusations in real time, and initiate prosecution of corrupt individuals. The goal is to take CONAC services closer to the population, encourage accusations, and initiate prosecutions, building public confidence in CONAC. It has achieved some results and has four clinics already:

- Littoral Region: 365 files investigated, three suspects arrested.
- West Region: 80 files investigated, 11 suspects arrested.
- East Region: 54 files investigated, four suspects arrested.

- South Region: 54 files investigated, five suspects arrested. Funds were retrieved (1,016,500 CFA francs in cash) and deposited in government coffers during the Anti-Corruption Clinic in the South Region.

Communication platform with heads of anti-corruption units (biannual meetings)

CONAC's objective is to train heads of anti-corruption units and accompany them in their activities, as well as to use heads of anti-corruption units to solve cases of systemic corruption in their institutions. Its goal is to render anti-corruption units active, to ensure a minute-by-minute contact with heads of the units through WhatsApp, and to ensure rapid processing of accusations concerning systemic corruption in government ministries and other public and para-public institutions. The results of this initiative are: 150 heads of anti-corruption units were trained in 2023 on identifying acts of corruption/assimilated offences, management errors and how to avoid them, developing and ensuring personal and workplace ethics and integrity, anti-corruption communication for change, managing change, overcoming resistance and measuring progress in the fight against corruption, and drafting a code of ethics, a procedural manual and corruption risk maps.

Also, more than 200 accusations received through CONAC's Hotline and WhatsApp have been transmitted to anti-corruption units for processing, problem solution and reporting to CONAC.

Partnerships

The essence of partnership is to ensure the fight against corruption is taken on by key actors. That is, to popularise the fight against corruption by increasing the mass of positive actors ready to fight against the ill, to encourage accusations and to promote integrity.

Since January 2024, CONAC has intensified its formal partnerships with the Ministry of Women's Empowerment and the Family, using women as agents of change in the fight against corruption; 22 community radio stations, to encourage the use of local languages to mobilise the population against corruption; and three artists, to use their anti-corruption songs to reach out to the population. Formal partnerships with INTERPOL, ENEO (Cameroon's electricity distributor), the Minister of Youth Affairs, and Yaoundé Command Staff College are being explored.

Challenges

Some of the challenges CONAC faces are: huge financial costs for activities; a static budget since creation; the absence of an appropriate judicial framework to facilitate criminalisation of some offences (illicit enrichment); non-declaration of assets and property; that its services are not decentralised (low presence on the field); and low staff skills/capacity.

Recommendations

Adequate resourcing is indispensable if anti-corruption institutions are to produce results. This entails appropriate human, financial and technical resources; and a friendly judicial environment (good laws).

Annex 41. Supply chain due diligence for anti-corruption

Luca Maiotti, OECD Policy Analyst

The OECD Responsible Business Conduct Instrument aims to address corruption risks in mineral supply chains by providing clear guidelines for companies, governments and civil society. This initiative is critical as extractive industries – comprising mining, quarrying, oil and gas extraction, and related support services – account for significant cases of transnational bribery. According to the OECD's 2014 *Foreign Bribery Report*, extractive industries represent one in five foreign bribery cases. For African countries, corruption in these industries costs an estimated USD50 billion to USD150 billion annually.

As global demand for critical minerals surges to meet net-zero goals, corruption risks in mineral supply chains become increasingly concerning. Many resources are located in regions with low governance scores, exacerbating vulnerabilities. Minerals like cobalt and copper, particularly from the Democratic Republic of Congo, highlight risks in both large-scale mining and artisanal small-scale mining. Precious metals, with their high value and portability, are particularly attractive to organised crime groups. Features like ease of smuggling, fungibility and low regulatory oversight make them prime targets for money laundering, fraud and tax evasion.

To combat these challenges, the OECD's *Due Diligence Guidance for Responsible Mineral Supply Chains* offers a practical, five-step framework for companies. This framework applies globally to all minerals, particularly those sourced from conflict-affected or high-risk areas. It emphasises establishing strong management systems, identifying and prioritising risks, managing those risks through collaboration and capacity building, conducting third-party audits, and publicly reporting on due diligence efforts.

For upstream companies, due diligence involves ensuring traceability to the mine of origin, conducting on-the-ground assessments in flagged supply chains, and engaging with local governments and civil society to mitigate risks. Downstream companies focus on identifying choke points, collecting due diligence information from upstream entities and leveraging industry influence to improve practices. Refiners, often control points in the supply chain, undergo third-party audits to ensure compliance.

Corruption risks require robust internal management systems, including anti-corruption compliance programmes, risk prioritisation mechanisms and active monitoring of suppliers. Companies must also address corruption risks at multiple tiers of the supply chain, from immediate suppliers to those farther upstream. Public reporting and participation in remediation initiatives further strengthen accountability.

The OECD emphasises a progressive approach to risk identification and mitigation, recognising corruption as a systemic issue in high-risk areas. Measures range from increasing leverage over suppliers to disengaging when risks cannot be effectively managed. Companies are encouraged to build the capacity of their suppliers by updating contractual clauses, codes of conduct and by providing targeted training.

This guidance goes beyond traditional compliance frameworks, which focus primarily on legal and reputational risks. Instead, it adopts a broader lens to address the adverse impacts of company operations on people and the planet. By looking beyond tier-one relationships, the OECD approach ensures a more comprehensive and sustainable effort to combat corruption in mineral supply chains.

Thank you. For more information, visit the [OECD Responsible Business Conduct webpage](#) or the [due diligence guidance website](#).

Annex 42. Forging partnerships: blueprint for forensic investigations for asset recovery

Amaechi Nsofor, Head of Africa, Insolvency and Asset Recovery

Overview

This presentation addresses the critical role of partnerships in tackling illicit financial flows and promoting forensic investigations in Africa.

Key statistics

- Illicit financial flows: Over USD 60 billion annually.
- Corruption losses: Exceeding USD 100 billion annually.
- Infrastructure funding gap: USD120 billion annually.

Barriers

- Political will. A lack of commitment to prioritise anti-corruption measures.
- International collaboration. Limited co-operation across jurisdictions.
- Funding. Insufficient resources for comprehensive investigations.
- Legal frameworks. Inadequate or outdated laws and regulations.
- Asset management. Poor mechanisms for recovering and preserving value.
- Skillsets. Shortage of specialised expertise.

Proposed solutions

- Public/private partnerships. Leveraging resources and expertise from both sectors.
- Dual approaches. Utilising criminal and civil proceedings.
- Training. Enhancing skills and capacity through targeted programmes.
- Regime change protections. Ensuring continuity in anti-corruption efforts.
- Transparent funding. Developing sustainable and transparent financial models.

Way forward

- Begin investigations domestically and collaborate internationally.
- Build trust, accountability and transparency within systems.
- Create mechanisms to adapt to political or regime changes.

Conclusion

Addressing these barriers through strategic partnerships and robust frameworks is crucial for effective asset recovery and forensic investigations in Africa.

Annex 43. Country presentation by Sierra Leone

Commissioner, Anti-Corruption Commission

The Anti-Corruption Commission (ACC) of Sierra Leone has introduced a non-prosecution policy to address challenges in prosecuting corruption cases while ensuring accountability and recovery. This approach aims to provide alternatives to court proceedings, making the fight against corruption more efficient and impactful.

The conventional court-based recovery process often faces significant delays and resource constraints. To mitigate these issues, the ACC's non-prosecution policy allows for alternative methods that focus on restitution and deterrence. Under Section 7(1) of the Anti-Corruption (Amendment) Act No. 9 of 2019, the ACC Commissioner has the authority to either initiate court proceedings or enter into agreements with suspects. These agreements may involve refunding the amount lost by the state, paying an interest of at least ten (10) per cent, and being barred from holding public office for a minimum of three years.

The policy provides guidelines to assist prosecutors in deciding the appropriate course of action. Prosecutors are encouraged to consider alternative sanctions based on the circumstances of each case, including the fairness and timeliness of such measures. They must also assess the impact of these alternatives on law enforcement interests, deterrence and the rights of victims.

Several factors are considered when determining whether prosecution is appropriate. Prosecutors evaluate the seriousness of the offense, the willingness of the suspect to co-operate and provide restitution, and the potential harm caused by the corrupt conduct. The likelihood of a successful prosecution and the necessity of sending a strong deterrent message are also key considerations.

The policy outlines a range of alternatives to criminal prosecution. These include civil penalties, such as attachment orders and damages for benefiting from corruption, restitution for misappropriation offences, forfeiture and confiscation of assets, co-operation agreements, and non-prosecution or deferral agreements.

This approach has yielded significant benefits. It provides a practical solution to some of the challenges associated with court proceedings, such as delays and resource constraints. By focusing on recovering stolen assets without requiring court orders, the policy ensures that the corrupt are held accountable in a manner that is both effective and expedient. It also enhances coherence in decision-making, fosters public trust, and strengthens the integrity of the ACC's work.

The ACC has achieved notable successes through this policy. Cash recoveries have exceeded 45 million leones (Le) (approximately USD 3.5 million). Sierra Leone has also made significant progress in anti-corruption rankings, improving from 130th in 2018 to 108th in 2023 on the Transparency International Index. The country has consistently surpassed the sub-Saharan average on the MCC Scorecard, achieving over 70 per cent from 2018 to 2023.

Public perception of the government's anti-corruption efforts has also improved significantly. In 2023, 58 per cent of citizens approved of these efforts, compared to only 19 per cent in 2015. Corruption is no longer seen as the number one issue in the country, and Sierra Leone has been recognised for its exemplary management of COVID-19 funds, ranking third in Africa and first in West Africa.

The non-prosecution policy represents a vital tool in Sierra Leone's fight against corruption. By emphasising accountability, deterrence and the recovery of stolen assets, the ACC has demonstrated that innovative approaches can lead to substantial progress in addressing corruption.

Annex 44. Key initiatives and projects undertaken by DCEC

Directorate on Corruption and Economic Crime

**Botlhale Makgekgenene, Director General,
and Malebo J Thupeng, Focal
Point, Botswana**

Botswana's longstanding vision of a corruption-free society since 1994 continues to guide its efforts. This presentation highlights key initiatives and achievements, legislative reviews, notable corruption cases, corruption-prone areas, challenges, and lessons learned.

Botswana's Corruption Perceptions Index (CPI) score for 2023 reflects stagnation, ranking among Africa's top performers alongside Seychelles (71) and Cape Verde (64) with a score of 59. However, challenges like justice system infiltration persist. Following the 2023 conference of Heads of Anti-Corruption Agencies in Seychelles, Botswana has undertaken several initiatives to further combat corruption and enhance institutional accountability.

One of its successful projects is the Strategic Partnership Engagements, aligned with the DCEC Strategic Plan (2021–2026). This includes partnerships with institutions such as the Anti-Corruption Commission (ACC) of Eswatini, focusing on capacity building, risk management frameworks and developing risk registers. Botswana's Bi-National Commissions extend these collaborative efforts through memoranda of understanding (MoUs) with countries like Zimbabwe, Namibia and Eswatini. Key activities included joint events such as the African Anti-Corruption Day, the Southern Africa Development Community (SADC) Anti-Corruption Expo and educational tours.

An innovative project introduced in 2023 is the 'Corruption Free Squad #He Hogo' roadshow campaign. This five-day campaign in Kgalagadi District utilised 'edutainment' and strategic partnerships with local leadership to engage diverse segments of society. It coincided with the 20-year commemoration of the United Nations Convention Against Corruption (UNCAC) and was sponsored by the UNDP with merchandise valued at USD 6,500. A similar roadshow is planned for June 2024 in the northern region.

To commemorate milestones in anti-corruption efforts, Botswana hosted several outreach campaigns, including the African Anti-Corruption Day and the UN International Anti-Corruption Day. These events featured corporate social responsibility activities, integrity walks and community prayers, graced by senior government officials and stakeholders.

A strategic project under the Ministerial Performance Reviews (MPRs), first introduced in 2012, focuses on human resource management, financial management and anti-corruption frameworks. While halted in 2018 for methodology improvement,

the reviews have been revived in 2024 with renewed emphasis on awareness raising for ministries, departments and agencies, preparing them for implementation by October.

A legislative review of the Corruption and Economic Crime Act (CECA) is at the drafting stage. It aims to broaden the scope of corruption offenses, expand the DCEC's mandate to the private sector and align with international conventions. The Whistleblowing Act of 2016 is also under review to strengthen whistle-blower protection and align with global standards.

Notable corruption cases include the abuse of office by the former CEO of the Botswana Housing Corporation (BHC), involving unauthorised sales of institutional property, and corruption in the Glen Valley Wastewater Treatment Plant project, where inflated contracts and bribes were uncovered. Other high-profile cases have involved senior officials influencing procurement processes and benefitting from bribes.

Corruption-prone areas in Botswana include tendering and procurement, the construction industry, land acquisitions, and road transport licensing. Challenges in combatting corruption include delayed prosecutions, non-implementation of audit recommendations and resource constraints. However, the DCEC has learned the importance of stakeholder engagement, strategic partnerships and lifestyle audits to address unexplained wealth.

In conclusion, the DCEC is committed to addressing challenges by advocating for increased resources, monitoring corruption trends, prioritising corruption-prone areas, strengthening legislation and enhancing collaboration with justice system actors. These efforts aim to sustain Botswana's vision of a corruption-free society.

Annex 45. Cryptocurrency and asset management

Aidan Larkin, Lesotho

Keynotes

- Opportunities of blockchain technologies, investigating seizing digital assets, tackling corruption and counter-terrorism financing.
- Involved in the first crypto seizures in the UK and EU.
- There is the wider contest of seizing assets and how this applies to crypto assets and digital assets in combatting corruption.
- 1 per cent of UDS 1 trillion from criminals is seized globally.

Challenges

- Manual system (assets getting lost, stolen etc).
- Crypto assets are easier to size and manage.
- The directions are clear but if you fall off it can be catastrophic.
- If you make mistakes, there is no one to help (no bank to call, no IT support) because it is decentralised.
- The Financial Action Task Force (FATF) focuses on asset recovery as a strategic priority. Interpol has factored the FATF in its mutual evaluation.

Why it's important to factor in FATF?

- The ability to remove capital from criminals is key because it disorganises their activities.
- Assets stripped from criminals are very impactful because some criminals spend a short time in prison and then return to their assets.
- The four 'Ds' of disorganising criminal organisation - deter, deprive, discredit and disrupt.
- There is no special crypto legislation when it comes to enforcement of digital assets (cryptocurrency).
- It is a global problem.
- It is not traceable.
- There is a phenomenon opportunity to seize cryptocurrencies, since no account owners come forward.

Challenges we want to overcome in our jurisdiction that will enable us to seize digital assets.

- Weak system.
- Must have enforcement capabilities for dealing with criminals.

There must be an effective system – using a manual to database system makes the system vulnerable to hackers or criminal organisations.

Annex 46. The need for digitalisation: a tool to fight corruption in Africa

HE Dr Alhaji Mahamudu Bawumia, the Vice President of the Republic of Ghana

Honoured Guests, Ladies and Gentlemen,

First, allow me to welcome you all to our beautiful country, Ghana. I am sure you will continue to experience the legendary hospitality of our people. While you are here, I invite you to sample all Ghana has to offer – the friendliness and warmth of our people, our food, beaches, music and heritage sites. I also wish to extend my congratulations to all of you gathered here for the 14th Regional Conference of Heads of Anti-Corruption Agencies in Commonwealth Africa. This conference represents the 'sharp end' of the fight against corruption in Africa.

The challenges of stemming corruption in Africa are well documented. The increasing use of technology has made it more complex for criminals to hide and launder proceeds of corruption. The cost of corruption to Africa's wealth, health, education and economic progress is enormous. Some estimates suggest that over the last five decades, more than USD 1 trillion – equivalent to all official development assistance – was lost in Africa through corruption and illicit financial flows. This should be deeply worrying to every African, particularly anti-corruption and law enforcement agencies like yours. As the Commonwealth Secretary-General, the Right Honourable Patricia Scotland KC, stated at your 13th conference:

'When we tend to think of corruption in purely monetary terms, the truth is that it costs us the quality of our lives. No country, no region, or community is immune. It damages education, health, justice, democracy, and development, and it is one of the biggest impediments to achieving the Sustainable Development Goals.'

I strongly agree with these sentiments. It is my hope that together, we will continue our efforts to defeat corruption in Africa in all its forms.

Since the conference began, you have covered a lot of important topics. This morning, I want to focus on three strands of corrupt activity that are especially pressing and can be tackled effectively through digitalisation and technology. First, bribery and its impact on young people. A significant percentage of people interacting with public officials are either asked to pay or end up paying a bribe. Unfortunately, younger people, particularly those aged 25–34, are the most affected. With over 60 per cent of Africans under 25 years, bribery poses a serious threat to our continent's future. Second, revenue leakage and its impact on governance. Corrupt individuals privately pocket revenue meant for the state, resulting in governments struggling to finance infrastructure, health, education and other critical services. This often leads to borrowing, even when funds could have been internally generated. Payroll fraud, especially 'ghost workers', has also been a persistent problem in Africa. Third, the

ecosystem of corruption. Corruption functions like an organised value chain, with networks of individuals facilitating illicit transactions. To make significant progress, we must not only focus on corrupt individuals but also disrupt their networks.

To track corrupt individuals and how they hide their wealth, Ghana has implemented a biometric Ghana Card, which serves as a single, unique identifier. This card has been linked to bank accounts, SIM cards, mobile money accounts, tax records, driver's licenses, pensions and payrolls, making financial fraud and tax evasion much more difficult. In 2017, only 4 per cent of Ghanaian adults had a Tax Identification Number (TIN). By linking the Ghana Card to TINs, we increased this figure to 85 per cent almost immediately. The Ghana Card also serves as a Social Security Number and National Health Insurance Number, further improving accountability.

To combat bribery, we have introduced digital solutions to remove the human element from government transactions. The Ghana.gov platform is a one-stop digital platform for accessing and paying for government services. Currently, 99 per cent of government agencies (1,507 out of 1,517) are onboarded, ensuring transparency. Citizens apply and pay for services online, eliminating cash transactions and the opportunities for bribery. Additionally, the passport and driver's license application processes have been fully digitalised, significantly reducing corruption that was once common in these services. Port operations have also been digitalised through the implementation of a paperless ports system, reducing bribery at customs. Other services, such as scholarship applications and utility payments, have also moved online. For example, electricity payments can now be made digitally, eliminating middlemen and reducing opportunities for bribery. National Health Insurance renewal has also been fully digitalised, allowing people to renew policies from their phones instead of queuing for days, where bribery used to be common.

Beyond preventing bribery, digitalisation also helps track money and identify corruption networks. The Bank of Ghana is currently piloting a Central Bank Digital Currency (CBDC) called the 'e-Cedi', which will make it easier to track money and detect suspicious financial activities. This will provide high transparency, reduce fraud risks, and curb money laundering by allowing real-time tracking of transactions.

The impact of digitalisation in Ghana has been significant. At the Passport Office, revenue increased from 12 million Ghana cedis to 94 million Ghana cedis after digitalisation. Since 2020, the Ghana.gov platform has helped collect 201 billion Ghana cedis in government revenue, reducing losses from cash leakages. The fight against payroll fraud has also seen major success. We have removed 29,000 ghost pensioners from the National Pension Scheme, saving 480 million Ghana cedis annually. Similarly, 44,707 ghost workers were eliminated from the National Service Scheme payroll between 2022 and 2024, saving 356 million Ghana cedis. Using biometric identification for payroll audits ensures that 'ghosts do not have fingerprints' – helping to remove fraudulent entries.

As we look to the future, Ghana is moving towards blockchain technology to enhance transparency in government transactions. Blockchain will allow real-time tracking of any modifications to digital records, making Ghana the first blockchain-powered government in Africa and one of the few globally. Blockchain technology ensures that once data is recorded, it cannot be altered undetected. This will make it much harder for corrupt actors to manipulate records and cover up illicit activities.

Additionally, we must invest in digital forensics and AI (artificial intelligence)-driven cybersecurity tools to detect and disrupt corruption networks. Establishing security operations centres (SOCs) specifically for fighting corruption will be

crucial in the years ahead. Anti-corruption and law enforcement agencies must leverage cutting-edge technology to stay ahead of increasingly sophisticated corruption schemes.

Ladies and gentlemen, digitalisation is proving to be a game-changer in the fight against corruption. By digitising public services, we are reducing bribery. By tracking revenue digitally, we are preventing leakages. By deploying digital tools, we are disrupting corruption networks. Our collective challenge is to leverage these technologies to track, trace and dismantle corruption in Africa. If we succeed, we will give our continent a real fighting chance against poverty and underdevelopment.

Thank you for your attention.

God bless you, God bless Africa, and God bless our homeland, Ghana.

Annex 47. Reading of the Communiqué by Dr Roger Koranteng, Commonwealth Secretariat

THE 14TH REGIONAL CONFERENCE AND ANNUAL GENERAL MEETING OF HEADS OF ANTI CORRUPTION AGENCIES IN COMMONWEALTH AFRICA, ACCRA, GHANA

THEME: STRENGTHENING INSTITUTION AND PROMOTING TRANSPARENCY: A MEANS OF FIGHTING CORRUPTION IN COMMONWEALTH AFRICA

RESOLUTIONS

1. **WE**, the Heads and Representatives of Anti-Corruption Agencies in Commonwealth Africa, meeting at the 14th Commonwealth Regional Conference of Heads of Anti-Corruption Agencies in Africa organised by the Commonwealth Secretariat and co-hosted by the Economic and Organized Crime Office (EOCO), as the lead agency, the Commission on Human Rights and Administrative Justice (CHRAJ) and the Office of the Special Prosecutor (OSP) all of the Republic of Ghana, at the Kempinski Hotel Gold Coast City, Accra, Ghana from 5-12 May 2024;
2. **NOTING** with deep gratitude the invaluable support and warm hospitality provided by the government and people of Ghana, through the leadership of His Excellency Nana Addo Dankwa Akufo-Addo, President of the Republic of Ghana, who was represented by Hon. Godfred Yeboah Dame, Attorney General and Minister for Justice to open the conference;
3. **THANKING** His Excellency, Dr. Mahamadu Bawumia, Vice President of the Republic of Ghana for gracing the conference and delivering a special presentation on the importance of digitalisation in the fight against corruption in Africa.

4. **COMMENDING** the Government of the Republic of Ghana through the Economic and Organized Crime Office (EOCO), Commission on Human Rights and Administrative Justice (CHRAJ), as well as the Office of the Special Prosecutor (OSP), and the Commonwealth Secretariat for hosting the 14th Conference;

5. **MINDFUL** of the need to strengthen cooperation and collaboration between the Anti-corruption agencies in Commonwealth Africa and desiring to work with allied institutions to combat corruption at all levels;

6. **NOTING** the need for a platform to share best practices and country innovations in the fight against corruption for the promotion of good governance;

7. **HAVING** exhaustively discussed the aims, objectives and the programme content and being satisfied that a full exchange of views has taken place on the goals of the conference agree and adopt the following resolutions;
 - a. Commonwealth African governments should enact and enhance legislative frameworks to ensure the establishment and accessibility of beneficial ownership registers in line with best practice;
 - b. Commonwealth African governments should ensure the mandatory disclosure of assets and liabilities of all public

- service holders, and take necessary steps to audit their lifestyles, and that of their significant associates;
- c. Commonwealth African governments should consider legislative frameworks which put the burden of proof on individuals with unexplained wealth;
 - d. Member countries should scale up the use of technology to combat corruption;
 - e. Commonwealth African governments should commit adequate resources to Anti-Corruption agencies, to ensure the latter's effectiveness and sustainability at fighting corruption;
 - f. Anti-Corruption agencies should collaborate with relevant local agencies and cooperate with key international partners in the fight against corruption;
 - g. Anti-Corruption agencies should consider leveraging expertise of international partners and key players to build capacity towards combating corruption;
 - h. Anti-Corruption agencies should preserve their independence as a means to ensure their effectiveness and upholding the integrity of their work;
 - i. Anti-Corruption agencies should intensify corruption prevention in view of the evolving corruption landscape.

8. **NOTING** further and welcoming the variety and diversity of experiences shared, agree:

- i. To continue further discussions and capacity building on evolving issues, including transparency of activities which is crucial to the enhancement of the image of anticorruption agencies;
- ii. Anti-Corruption Agencies should facilitate the implementation of MLA requests made to their countries from other member countries;
- iii. To heighten the importance of Mutual Legal Assistance as an appropriate vehicle in accelerating prosecution of corrupt individuals and reassure Anti-Corruption agencies of its usefulness; and
- iv. To focus on building capacity of Anti-Corruption officers to effectively trace and recover digital or virtual assets.

9. **FURTHER** agree to accept the offer by South Africa (SA) to host the next Conference in 2025 in partnership with the Commonwealth Secretariat.

10. The Conference confirms that Economic and Organised Crime Office, Ghana becomes the next Chair.

**DECLARED AND SIGNED AT ACCRA, GHANA ON FRIDAY
10TH MAY 2024.**

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Annex 48. Remarks by Outgoing Chairperson

I thank you all sincerely for the support you've given me in the seven years that I have been in this Commonwealth Africa family and in the last year as Chairperson of the Association. And I would like to thank all those of you who have supported me in what has been a tough year personally and professionally. It has been a real honour serving you all as Chairperson of the Association. And without much further ado, I would like to pass on the chairmanship baton to my sister from EOCO, Ghana. Thank you.

Annex 49. Remarks by the Incoming Chairperson

Outgoing Chairperson, Commissioner May De Silva, heads of anti-corruption agencies in Commonwealth Africa, our distinguished invited guests, our friends from the media, ladies and gentlemen. I am deeply honoured and humbled as the new Chairperson for the Heads of Anti-Corruption Agencies in Commonwealth Africa. This appointment is not just a personal achievement, but a testament to the collective dedication of all those who have worked tirelessly in the various areas in the fight against corruption and other forms of financial crimes across the continent. It is a challenging endeavour, but the rewards, as we know, are worth the effort.

I remember my first encounter with the Conference of Heads of Anti-Corruption Agencies in Commonwealth Africa in 2022 in Kigali, Rwanda. And as I listened to presentations from a number of speakers and various interventions, I had no doubt in my mind that strategies changed would be affected to make the Economic and Organised Crime Office more forward-looking and impactful, and have positive impacts to serve my country. I must say that I am delighted to be part of this noble institution of the Commonwealth.

It is an undeniable fact that corruption remains one of the most significant impediments to the development and progress of our nation. It undermines the rule of law, erodes public trust in institutions and perpetuates inequalities and injustice. As leaders in the fight against corruption, we have a solemn duty to confront this menace head-on with unwavering resolve and steadfast commitment. I want to extend my heartfelt gratitude to all member agencies for entrusting in me these responsibilities. Be assured, and I do not take this trust lightly and for granted, I plan to serve with integrity, impartiality and diligence, always mindful of the immense responsibilities that come with this role. Together, we can redouble our efforts to strengthen anti-corruption frameworks, enhance co-operation and collaboration among agencies, and foster culture of accountability at all levels. We must leverage technology and innovation to bolster our investigative capabilities and ensure that those who engage in corrupt practices are swiftly brought to justice. Furthermore, I recognise the importance of engaging with civil society and private sector and international partners in our collective endeavour to combat corruption. These insights, expertise and support are invaluable as we work to build a more transparent future for all Africans.

As we gather today, we represent a global community united against corruption. We recognise that this affects all of us, transcending borders and undermining trust, prosperity and justice. Our shared commitment to combatting corruption is a beacon of hope for a better future. Over the next year, I plan to work with all the ExCo members, and by ExCo members I mean South Africa, Eswatini, Sierra Leone, Tanzania, Botswana and Seychelles. We will foster collaboration and knowledge sharing and enhance our collective capacity to combat corruption. We also support innovative solutions and best practices. Together, we will drive progress, learn from each other's successes and challenges, and create a stronger, more resilient Commonwealth of Africa network.

Thank you for the privilege to serve and for your trust and confidence in me. Let us embark on this journey together with courage, determination and hope. I look forward to a better conference in South Africa. Let us be united and let me take

this opportunity to thank the Local Organising Committee, chaired by my boss, the Deputy Attorney-General and Deputy Minister for Justice. Your commitment, your dedication, and I don't know what to say again because even though EOCO was leading this whole thing, it was a collective effort of most stakeholders. And I want to take this opportunity to thank the Comptroller General of the Ghana Immigration Service for their support, especially getting visas for our people at the airport. I want to thank the Special Prosecutor, the Commissioner for Human Rights and Administrative Justice, the Inspector General of Police, the State Director of State Protocol, the Ministry of Foreign Affairs, my own staff, EOCO staff, the media, everybody who played any part in ensuring that this conference has been the way that we wanted it to be.

Let me take this opportunity to also apologise to you if anything has not gone the way that you expected it to be. Like I said, South Africa will learn as we learned from Seychelles and Rwanda, and that the 2025 conference will be an improvement of this one that you've had. And I also want to say congratulations to all of you for taking part, leaving your very busy schedules to be here. Our international speakers, we thank all of you. Our local invited guests, everybody, we say thank you. I wouldn't want forget Movenpick Hotel, Kempiski, Accra City, Thang Palace, and especially the catering staff, everybody, we thank all of you. And I wish you God's troubling mercies as you go back to your various homes. And for Commissioner May, you have ended but you have just begun because I'm going to need your support.

As I end, I want all of us to take a copy of the Communiqué that we have just read out and take each point one after the other. All those things that we have set out to do, where we have to remind our various governments to take action. We should go back and look at them so that this conference won't just be a conference of reading communiqués. But whatever we set out to do, we will do that and at the end of the day when we come back or we meet in South Africa, we will be bold to say, after Ghana's conference, we've been able to do A, we've been able to do B and that our institutions are growing stronger and stronger. It is when the citizenry has trust in the institutions that is when we begin fighting corruption.

Once again I thank you for the trust imposed in me. May God bless you.

Annex 50. Closing Remarks by Alfred Tuah Yeboah, Deputy Attorney General, Ghana

I was making this point about the chairperson. I'm making a point as to why you should use chairperson instead of chairman. Because chairperson, if you take the person in itself, we have the last three letters, you have S-O-N, son. That's me. If you want to use chairwoman, the last three letters, you also have M-A-N, man. If you use chairman also, the last letters, you also have this M-E-N. So, I usually use chairman for whether it is a man or a woman. That settles the argument.

Let me commend Maame Tiwaa for getting elected as the chairperson of this august group. Maame Tiwaa is a hardworking woman and someone who is ready to push the boundaries to ensure that things get done. My boss, the Attorney-General, was here on Monday to open this conference with the President of the Republic. I'm here today to close the conference. For the last five days, I'm very much convinced that we've discussed a lot of issues. Anti-corruption agencies are so crucial that if we begin to downplay the roles they have, we politicians will find a way to get out of whatever that we do. So, politicians all over the world should be interested in whatever anti-corruption agencies do, because you are there to ensure that the resources that we've been given to manage are managed properly.

For the last five days, once again, you've been in Accra. You are confined to this conference room. Some of you went to the Kwame Nkrumah Memorial Park yesterday. You are not done yet. And this time tomorrow, you'll be in Cape Coast, the capital of the Gold Coast, before Accra became the capital of Ghana. As you leave here, I would like to extend another invitation to you that in December, every year, there's something we call December to remember; in Ghana, take time. Come back to Ghana in December and experience a month of Christmas festivities. You come, and if you want to change your nationality, you acquire a new one. At least there is a space within which you come in and you don't go through all the process that you are supposed to go through if you were to come in other months.

Africa is a land of possibilities. For that matter, Ghana is also a land of possibilities. What is left to do is to make a commitment that we must all ensure that our generation and the future generations will benefit from the resources that the good Lord has bestowed on us. We can benefit from these results only when we are able to protect the public purse, and you are agents or the kind of partners that we want to have.

I was not here for the last four days. I went with the Vice President to the countryside, but I understand that yesterday, he was here to speak to you on digitalisation and how we can fight corruption. I'm of the humble opinion that if we all accept the proposal that we can fight corruption through digitalisation, that's what we can also use in fighting corruption everywhere, because human interface is something that we must always try to do away with. I'm not going to give you a lecture on digitalisation because the Vice President was here yesterday. You must go back to your countries. I know already you are doing such things, but make sure that you go back and add more to whatever you are doing to fight against corruption.

Dr Roger, on this note, it is my honour to announce that the official session of this conference is duly closed. The unofficial session will this evening continue at Movenpick. And tomorrow, we will journey to Cape Coast, where you can see what we have when it comes to other things in Ghana.

Thank you very much and may God bless us all.

Annex 51. Vote of Thanks by CSO Aba Jacqueline Opoku

Where do I start? After listening to the illuminating, incisive and impressive work that the heads of the delegation and the delegates have shared with us, there is a lot of food for thought for us to consider to enrich what we are doing in our various countries. As has been indicated by previous speakers, I think that we have had a very wonderful time during this session here, this 14th regional conference here in Accra. I just want to thank God that he was able to get all of us here safely. Some people had to do their contributions and go back to their home countries. Some of you are here and you are still working while participating in this programme. There are so many of you from your governments, from your agencies, and the individual commitment that you have even put to the presentations that you gave. And I think that you all deserve a round of applause. Thank you for that.

In Ghana, one of our languages is Ga, the Ga language. And to thank someone, to thank individuals, all of you present here, the agencies who supported us, the resources that were provided from various locations, the expertise, even the ideas that we were able to pull together. The same things which you spoke about, co-operation, collaboration, is working in other sectors. And we use some of those forms to be able to present you with this opportunity. In Ga, when someone does something for you which you truly appreciate, you wish life to their heads. You wish blessings to their heads. So in Ga, I would like to, from Ghana, from Bioko, from our co-hosts, the Commission on Human Rights and Administrative Justice, and the Office of the Special Prosecutor, of course, our minister, our mother agency, the Ministry of Justice, and the Honourable Attorney-General, able to be presented today, even by Honourable Alfred Tuah Yebua. I would want to wish each of you, I wish life, I wish health, I wish happiness to you all, to each of your heads, because it's from the head that everything else functions. It's this thing inside this brain, this brain inside this head, which carries us all. *Oyiwadonn*.

God bless us all. Thank you.

The Communiqué

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10TH MAY 2024.**

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10TH MAY 2024.**

The AGM Attendance list for heads/representatives

No.	Names	Agency
1	Thom T Shamakamba	ACC – Zambia
2	Abdi Mohmud	EACC – Kenya
3	Laldeo Boodhoo	FCC – Mauritius
4	Leonard Lekgetho	SIU – South Africa
5	Neema M Mwakalyelye	PCCB – Tanzania
6	Kimelabalou Aba	HAPLUCIA- Togo
7	May De Silva	ACC – Seychelles
8	Mkhatshwa Maphevu	ACC – Eswatini
9	Mercy Larbi	CHRAJ – Ghana
10	Maame Yaa Tiwa Addo-Danquah	EOCO – Ghana
11	Sefako Seema	DCEO – Lesotho
12	Paulos Noa	ACC – Namibia
13	Rev. D Massi Gams	CONAC – Cameroon
14	Beti Kamyia Turwomwe	IG – Uganda
15	Botlhale Makgekgenene	DCEC – Botswana
16	Dr Musa Adamu Aliyu	ICPC – Nigeria
17	Olanipekun Olukoyede	EFCC – Nigeria
18	Martha Chisuma	ACB – Malawi
19	Francis Ben Kaifala	ACC – Sierra Leone

**14th Commonwealth Regional Conference for Heads of Anti-Corruption
Agencies in Africa**

Kempinski Gold Coast City Hotel, Accra Ghana

6–10 May 2024

List of Attendees

S/N	Name	Country
1.	Dr Roger Koranteng	Commonwealth Secretariat
2.	Professor Luis Franceschi	Commonwealth Secretariat
3.	Julian Nathaniel Johnson	Dominica
4.	Rose Nunu Seretse	Botswana
5.	Botlhale Makgekgenene	Botswana
6.	Malebo John Thupeng	Botswana
7.	Mogolodi Rantsetse	Botswana
8.	Ketlhaotswe Mapho	Botswana
9.	Rev. Dr Dieudonné Massi Gams	Cameroon
10.	Irene Morikang TCHE	Cameroon
11.	Lucky Majali Nkambule (Dolphin)	Eswatini
12.	Maphevu Mkhathswa	Eswatini
13.	COP/Maame Yaa Tiwaa Addo-Danquah	Ghana
14.	Aba Jacqueline Opoku	Ghana
15.	Abdi Mohammud, MBS	Kenya
16.	FCPA John Lolkoloi, OGW	Kenya
17.	Knorx Molelle	Lesotho
18.	Litelu Ramokhoro	Lesotho
19.	Martha Chisuma	Malawi
20.	Grace Ndaona Chikagunda Banda	Malawi
21.	Dr Navin Beekarry	Mauritius
22.	Aruna Badoo	Mauritius
23.	Paulus Kalombo Noa	Namibia
24.	Ndapandula Seleste Kambonde	Namibia
25.	Dr Musa Adamu Aliyu SAN	Nigeria
26.	Bala Muhammed	Nigeria
27.	CE Abdulkareem Chukkol	Nigeria
28.	ACE 1 Ahmad Usman	Nigeria
29.	Odette Yankulije	Rwanda
30.	May De Silva	Seychelles
31.	Tanya Berlouis	Seychelles
32.	Francis Ben Kaifala	Sierra Leone
33.	Dolly Issa	Sierra Leone
34.	Leonard Lekgetho	South Africa
35.	Jabu Mahlalela	South Africa

(Continued)

S/N	Name	Country
36.	Neema Mwakalyeye	Tansania
37.	Jescar Millinga	Tansania
38.	Kimelabalou Aba	Togo
39.	Arouna K Lardja	Togo
40.	Hon. Beti Kamyia Turwomwe	Uganda
41.	Allan Daniel Bunyenyesi	Uganda
42.	Thom Trevor Shamakamba	Sambia
43.	John Kamungwa	Sambia
44.	Moagisi Terri N Mapii	Botswana
45.	Gilbert Christian Onana Nkudu	Cameroon
46.	Joyce Munene, HSC	Kenya
47.	Mr Lekhotla Sedia	Lesotho
48.	Canon Chenjesi	Malawi
49.	Marina Matundu	Namibia
50.	Tymon Katlholo	Botswana
51.	Simon Marsh	Basel Governance
52.	Dr Hady Fink	Partnership for Transparency Europe
53.	Aidan Larkin	Asset Reality (UK)
54.	Paul Davies	Asset Reality (UK)
55.	Marcella Van Berkel	Asset Reality (UK)
56.	Mr Amaechi Nsofor	Grant Thornton (UK)

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