Follow-Up Policy Paper on Corruption and Business in Ghana: Towards a Better Anti-Corruption Agenda

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Executive Summary

The private sector has been touted as the engine of growth in Ghana. However, certain prevailing conditions stifle the ease of doing business in Ghana. At the heart of these conditions is corruption in government agencies, which has served as a major impediment for private sector development in Ghana. As part of Private Sector Anti-Corruption Group's (PSACG) project, funded by the UK Government's Department for International Development (DFID) through the Strengthening Action Against Corruption (STAAC) programme, a study was conducted on how businesses perceived the impact of corruption on their activities. That study identified five key areas of concern: inadequate information on processes and costs of services; multiple regulatory agencies with duplicating and overlapping functions; multiple taxes, fees and charges for duplicated services; multiple law enforcement agencies performing regulatory functions at the ports and the lack of or inadequate channels for reporting corruption. To address the specific challenges that were identified in these areas, a number of policy recommendations were made in a policy paper presented to the Vice President and Chair of the Economic Management Team, Alhaji Dr. Mahamudu Bawumia.

As a follow-up to that report, this study assesses the extent to which the recommendations have been implemented. Based on a survey of a cross section of twenty-six (26) private sector companies which interface with various government agencies in their line of business, the report assesses whether or not business leaders perceive the business environment to be friendlier now than 2019. The findings and analysis gleaned in the report, are organized along the following themes:

i.   Inadequate information on processes and costs of services
ii.   Multiple regulatory agencies with duplicating and overlapping functions
iii. Multiple taxes, fees and charges for duplicated services
iv.   Multiple law enforcement agencies performing regulatory functions at the ports
v.   The lack of or inadequate channels for reporting corruption
vi.   Corruption relating to COVID-19
vii. Recommendations

Findings of the study show that generally, there has been some improvements in a number of the recommendations, particularly in terms of adequacy, clarity and up to date nature of information, reduction in the number of days for clearing goods, and a general ease and timely clearance of goods at the ports. Websites of government agencies have become the preferred mode of disseminating information on government services and cost of procuring these services, although more than 50% of businesses still had to send emails or place a telephone call to someone they know for such information. In spite of the improvements, there are areas where challenges still persist. These include, the existence of multiple regulatory agencies with duplicating and overlapping functions; multiple taxes, fees and charges for duplicated services, and multiple law enforcement agencies at the ports. Businesses are still required to register and seek approvals and certifications either for all of their activities or some aspects of their functions from a number of government agencies, and the avenues for reporting corruption remain inadequate. Trust in government to deal with corruption keeps waning, with a number of businesses indicating that they had no incentive to report acts of corruption because they felt nothing will be done about it. The persistence of these challenges suggests that there are still avenues for corruption in dealing with government agencies, with negative implications on the ease of doing business in Ghana.

Based on the experiences gathered in this survey, which shows that a number of the recommendations in the original report to the Vice President remain to be fully implemented, the following recommendations are proposed:

i.   Deploy a national digital and web monitoring and complaints system for reporting service ineptitude and corruption. Effective monitoring and feedback on corruption complaints is helpful in establishing trust among complainants. The use of technology in public agencies will provide a reliable means of accessing complaints at a centralized point, as well as sharing information to all relevant decision makers for quick response. This has the potential to support the implementation of the Whistleblower Act of 2006, (Act 720)

ii. There is the need for a digital mechanism (national hotline), for reporting corruption, managed by an independent non-governmental organization

iii. Implement the Anti-Corruption Action Plan (NACAP) in close collaboration with the private sector

iv. The appeal processes for the resolution of complaints must be clearly stated and communicated to all stakeholders

v.   Institute an annual mandatory ethics training for all public servants. This could be done through an online self-administered training that all public servants must enroll in at the beginning of each year

vi. All state agencies, especially the service delivery agencies, should institute and enforce gift policies

vii. The Government should empower CHRAJ to monitor the provision of administrative services and corruption complaints. CHRAJ should be well-resourced and mandated to prepare a separate annual report on corruption in administrative agencies to be submitted to the Office of the President; and copied to Parliament

viii. Institute a formal, objective and transparent performance review of public agencies with the aim of reducing corruption during the course of service delivery

ix. The heads of agencies that emerge as the most corrupt agencies from studies such as Afrobarometer should be mandated to submit an anti-corruption strategy to the presidency on how to reduce corruption. The implementation of the strategy should be monitored

x.   Parliament should pass the Code of Conduct for Public Officers Bill, which is currently in Parliament. After it is passed, it should be enforced.

1.0   Introduction

In 2019, the Private Sector Anti-Corruption Group (PSACG) project funded by the UK Government's Department for International Development (DFID)'s Strengthening Action Against Corruption (STAAC) programme assessed how businesses perceived the impact of corruption on their businesses. That study identified five key areas of concern: **inadequate information on processes and costs of services; multiple regulatory agencies with duplicating and overlapping functions; multiple taxes, fees and charges for duplicated services; multiple law enforcement agencies performing regulatory functions at the ports and the lack of or inadequate channels for reporting corruption**. To address the specific challenges that were identified in these areas, a number of policy recommendations were made in a policy paper presented to the Vice President and Chair of the Economic Management Team, Alhaji Dr. Mahamudu Bawumia.

This report evaluates the extent to which the policy recommendations in that report have been implemented. Based on a survey of a cross section of twenty-six (26) private sector companies which interface with various government agencies in their line of business, the report assesses whether or not business leaders perceive the business environment to be friendlier now than 2019. The findings and analysis in this study suggest that although there has been a generally more positive assessment on the various indicators used in the assessment this year, barriers still exist that limit the ease of doing business in Ghana. These observations are consistent with the ease of doing business 2020 report, which established that "Governments in many economies adopt or maintain regulation that burdens entrepreneurs". This "limits entrepreneurs' ability to freely operate a private business" and forces "foreign investors [to] avoid economies that use regulation to manipulate the private sector". For instance, between 2019 and 2020, Ghana dropped four places on the ease of doing business due to the introduction of more complicated and more costly tax system by limiting ability to recover portions of the value added tax.

2.0 Background of Organizations

This report is based on a survey of 26 private companies drawn from different sectors of operation, and from different demographic backgrounds. These backgrounds include; number of years in operation, size of turnover and type of company i.e., whether foreign or indigenous. In terms of sector of operation, the companies are spread across the finance and insurance sector, wholesale and retail trade, manufacturing, textile and apparel; transport and logistics, healthcare and social assistance, mining, oil and gas, and energy.

How many years have you been in operations In Ghana?
26 responses
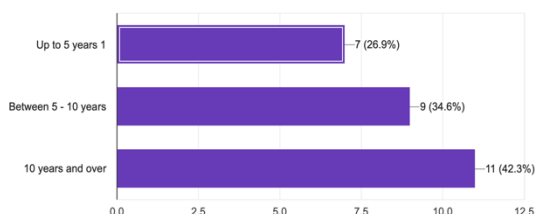
With regards to the number of years in operation in Ghana**,** close to half of the companies ie 42.3% have been in operation for over ten years. 34.6% have been operating between 5-10 years and 26.9% have been operating between 1-5 years.

Describe the size of your company by turnover
26 responses

Category	Value
Upto $500k	14 (53.8%)
Between $500k and $1m	1 (3.8%)
Between $1m and $10m	1 (3.8%)
Over $10m	9 (34.6%)
Social Security Fund	1 (3.8%)
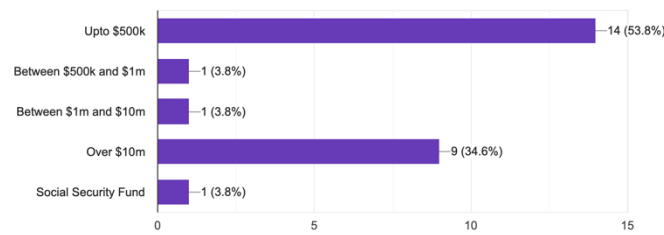
In terms of the size of company's turnover, 14 of the companies, representing 53.8% have a turnover of up to 500k. 1 company (4.3%) between $500k and $Im. 1 (4.3%) between $1m and $10m. 9 representing 34.6% have a turnover of over $10m.

Finally, 17 of the 26 companies, representing 65.4% are indigenous, while 8 representing 34.6% are foreign.

These variations give a good spread of companies across different sectors of the Ghanaian economy. This is particularly important, given that demographic backgrounds of companies have implications on the challenges they face as far as corruption is concerned. The variations further suggest that challenges identified in the survey are not limited to particular types of companies but affect all types of companies in Ghana. Finally, the spread is important because as a study bordering on corruption, whether a company is foreign or local has implications on the country's ability to attract foreign capital and investment.

3.0 Summary of Findings and Policy proposals

Consistent with the policy recommendations that were proffered in the previous report, the findings and analysis of this study are organized along the following themes:
1. Inadequate information on processes and costs of services
2. Multiple regulatory agencies with duplicating and overlapping functions
3. Multiple taxes, fees and charges for duplicated services
4. Multiple law enforcement agencies performing regulatory functions at the ports
5. The lack of or inadequate channels for reporting corruption
6. Corruption relating to COVID-19.

Findings of the study show that generally, **there has been some improvements along a number of these recommendations, particularly in terms of adequacy, clarity and up to date nature of information, reduction in the number of days for clearing goods, and a general ease and timely clearance of goods at the ports.** There are however areas where challenges still persist. These include, multiple regulatory agencies with duplicating and overlapping functions; multiple taxes, fees and charges for duplicated services, and multiple law enforcement agencies performing regulatory functions at the ports and lack of avenues for reporting corruption. The persistence of these challenges means that there are still avenues for corruption when dealing with government agencies, which have negative implications on the ease of doing business in Ghana.

4.0 Inadequate information on processes and cost of services

One of the critical elements for reducing corruption is availability of information on cost and processes involved in accessing services provided by government service delivery agencies. In the previous safe space study, lack of adequate information on processes and cost of government services were found to be major facilitators of corruption. Against this backdrop, several recommendations such as mandatory publication of services, timelines in delivery and costs of services on websites and

notice boards of government service delivery agencies were made. Agencies were also to update their websites regularly with current information and communicate alerts of such changes to key stakeholders. Mobile apps and other forms of digital applications were to be deployed for effective information dissemination of all service delivery agencies. Findings of the current survey show some improvements in these recommendations within the past year. The improvements are reflected in the areas of **increased interaction between business and government, improvements in processes involved in accessing information, and the adequacy, clarity and up to date nature of information provided by government agencies**. These are detailed out in the following sub-sections.

4.1 Interaction with Public sector institutions in the last year

Overall, the survey shows that within the last year, there has been a high level of interaction between businesses and public sector institutions. 23 out of the 26 companies representing 88.5% have interacted with a public sector institution in the past year. This does not only reflect a high level of interaction/engagement between government agencies and the private sector, but suggests the possibility of information flow. It also implies dependence of the private sector on the public sector, as well as partnerships between both sectors in providing public services.

This high level of interaction suggests that the actions of the public agencies will have implications on activities of business as a whole. Major agencies that businesses interacted with in the last year include; the Food and Drugs Authority, (FDA), Ghana Standards Authority, Ghana Investment Promotion Council (GIPC), Ghana Revenue Authority (GRA), Customs and Ghana Immigration Service, Passport Office, Registrar General's Department, Social Security and National Insurance Trust (SSNIT), the Forestry Commission, the Ghana Tourist Authority, the Public Utilities and Regulatory Commission (PURC), Ministry of Energy and the Energy Commission. These are largely service delivery and/or regulatory agencies. The word cloud in the figure shows that GRA, FDA, GSA, SSNIT, ministries are the most interacted with agencies. It is important to note that a number of these agencies are beneficiaries of the World Bank Public Sector Reform for Results Project (PSRRP) being implemented by the Public Sector Reform secretariat under the Office of the Senior Minister. The PSRRP aims at improving operational efficiencies of the selected service delivery agencies to serve the private sector and citizens better.

4.2 Nature of interaction with public agencies

The interactions between businesses and government agencies span a number of areas. These include registration of food products for instance by the FDA, technology transfer by GIPC, property rate, licensing and business operating permit payment by MMDA's, payment of taxes and tax clearance at the GRA, enquiry on customs duties tendering, tax clearance, and regulatory engagement. All of these signify a dependence of the private sector on the public sector for various kinds of services. Payment of fees, filing of tax returns are the most common form of interaction.

Generally, businesses sought information from public agencies on a number of issues. The major areas of engagement include; going for the required documentation, seeking information on cost of services, processes involved in accessing government services timeline for delivery. Between the previous report and this one, there has been major improvements on these fronts with 79.2 % of companies indicating that they found all the information needed when they interacted with public agencies.

4.3 Sources of Information

An important ingredient for reducing corruption in business dealings is **the availability of information on services, processes involved in accessing these services, timelines for delivering the service, and the cost of services.** Generally, businesses obtain information on processes and cost of government services from a number of sources. These include websites of agencies, notice boards and through emails.

Where did you find the information
22 responses
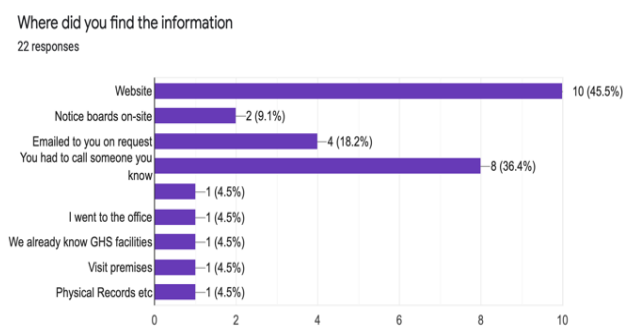
Websites represent an effective means of sharing and disseminating information on government agencies. Findings of the study indicate that websites of agencies remain the most used source of information for businesses, with 45.5% of companies sourcing information from the websites of government agencies. Other sources of information for businesses are notice boards on site, e-mails on request, and calling someone you know at the agency for the needed information.

While websites remain the main means of sourcing information, the study revealed that majority of businesses have to ask that information be mailed to them, or have to call someone they know from the office for information. This does not only suggest that information is not readily accessible, but also increases direct contacts between businesses and public officials, and thereby creating opportunities for corruption. Thus, if more than 50% of the respondents have had email or telephone contact with a public official, this could become breeding grounds for corruption. As recommended in the safe space report, it is important to ensure that there is as little as possible contact between businesses and public officials. To avoid corruption, **it is important to reduce the direct interface between public officials and business operators**.

Moreover, businesses which are unaware of the procedures and timelines for services to be rendered within public institutions become exposed and are likely to pay bribes for these services. Consequently, it is important to reiterate the point that, more interactive and updated websites are maintained by regulatory and service delivery agencies.

4.4 Adequacy, Clarity and Up to date nature of information

The survey established significant improvements in the adequacy, clarity and up to date nature of information businesses obtained about government procedures and services. In terms of adequacy, a significant number (68.4%) of businesses indicated that information received was enough. Similarly, they acknowledged that the information was clear/concise/easy to understand. Respondents indicated that information received was up to-date, and there was an established line/desk businesses could call for further clarification where required. Although businesses have to

pay for the services which were published, to a large extent, payments were usually consistent with the published cost. The mode of payment is mainly through bank, Cash and other electronic media.

However, there were few cases where other payments aside the published ones were requested. These, respondents say are usually for lunch and facilitation. This suggests that petty forms of corruption and bribery still persists in the dealings with regular government agencies. Some of the agencies named include the following even though there were no specifics: FDA, GIPC, MMDA's, GRA, Customs, Immigration police Service, PURC, Energy Commission, EPA, GNFS, Minerals Commission.

Table 1: Adequacy, Clarity and Up to date nature of information. Source: PSACG Survey

	Response (%)	
	Yes	No
Prior to your engagement, did you find all the relevant information you need?	79.2	20.8
Was the information received enough?	68.2	31.8
Was it clear/concise/ easy to understand?	81.8	18.2
Was the information up to date?	86.4	13.6
Was there an established line/desk you could call for further explanation/clarification where required?	61.9	38.1
Did you make payment for the service?	52.4	47.6
If yes, was the payment consistent with published cost? (if the cost was published/part of the relevant information you received)	71.4	28.6
Was they any other payment requested?	15.8	84.2
Was the agency one that you have had engagement with in the past or continue to have regular engagement with?	63.6	36.4
Have there been any changes in their processes in the past one year?	55.6	44.4
If yes, were you notified of the changes	71.4	28.6

4.5 Changes in Processes

Historically, and as captured by the National Public Sector Reform Strategy, both businesses and citizens have had a very damming verdict on the performance of public sector agencies. Many scholars and many assessment reviews have often characterized the **public sector as corrupt, inept, moribund, inefficient, wasteful, unresponsive and requires serious reforms** to make it responsive and business friendly. In this study, this verdict appears to be not so damning. In terms of changes in processes so far, a fair number of businesses indicated experiencing changes in the past one year. They also acknowledged being notified of these changes. The main means of notification of such changes are by letters. Although e-mail and SMS are used, they are not that predominant. The verdict on public sector agencies sending emails, using SMSs, using electronic engagement, web-based service provision such as the Driver and Vehicle Licensing Authority (DVLA), passport office, paperless port system, mobile interoperability and mobile payment system are said to have been positive changes happening now. In general, the feedback suggests quicker responses from state agencies and more innovative ways of engaging businesses. It is important to note that these new and positive changes have implications for reducing the interface between public sector agencies and businesses and consequently corruption. In spite of the positive assessment, respondents think there

are more opportunities for improvement. To further enhance engagement processes businesses would like government to:

- Ensure availability and timely delivery of information particularly in relation to the stages of processing
- Involve private businesses in deliberations
- Increase transparency in processes.
- Provide incentive packages to those services
- Improve on timeless
- Sensitize and educate businesses with good policies
- Improve record keeping for ease of accountability.

5.0 Multiple regulatory agencies with duplicating and overlapping functions

Businesses in Ghana operate within a mesh of government agencies which regulate their activities. As was established in the safe space report, there are a number of regulatory agencies in almost every business sector with duplicated and functional overlaps. Businesses are required to get approval and permits from these multiple agencies, in order to operate and that poses challenges for them.

Findings of this survey show that there has not been any significant departure from this situation over the past year. **Businesses are still required to register and seek approvals and certifications either for all of their activities or some aspects of their functions from a number of government agencies.** Some of these agencies are the Bank of Ghana, Auditor Generals Department, PPA, GSA, NCA, FDA, Police Service, Fire Service, AMA, GRA, Registrar General, Ghana Standards Authority, Ghana Tourist Authority, PURC, EMOP, HEFRA, Ministry of Energy, PURC, Energy Commission. The survey reports as follows: 33.4% of businesses deal with at least two regulatory agencies, 11.2% deal with at least three regulatory agencies, 33.4% deal with at least four regulatory agencies and 16.7% deal with at least five regulatory agencies. It is clear from the word cloud that GRA, FDA, GSA and energy commission are the most frequently encountered agencies. **In fact, 5.6% of businesses deal with at least sixteen regulatory agencies.** See response in figure 1.

Figure 1: Number of Regulatory Agencies Businesses encounter in normal course of work
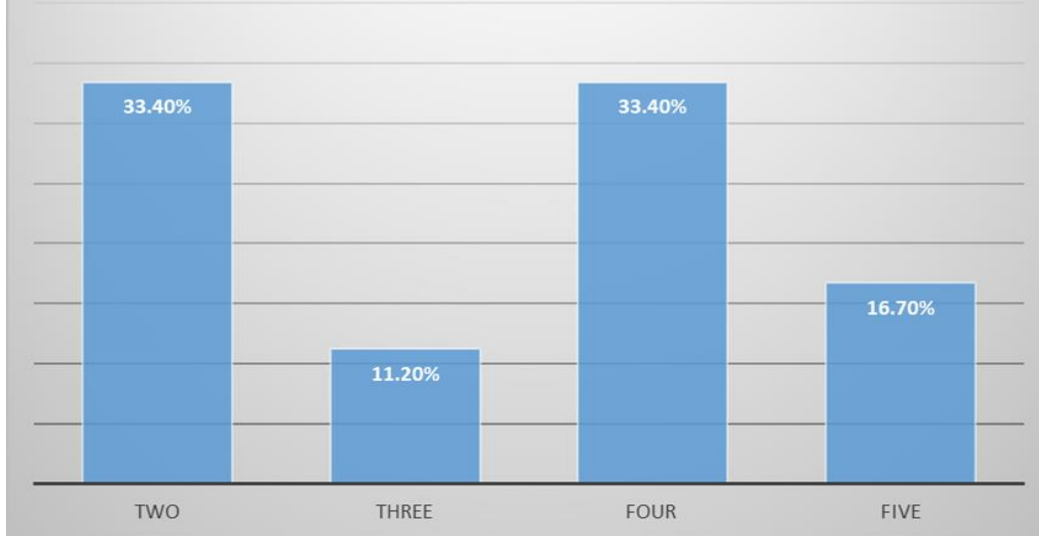
From these agencies, businesses are **obliged to go for various permits and certifications in order to operate**. These permits present a significant cost to businesses and when they are in their multiples for similar services, **they further increase the cost of doing business in Ghana. This has the propensity for corruption, as businesses may want to circumvent such multiple registrations.**

5.1 Clarity on Services and Processes

Is it clear cut which agencies you require what permits from?
21 responses
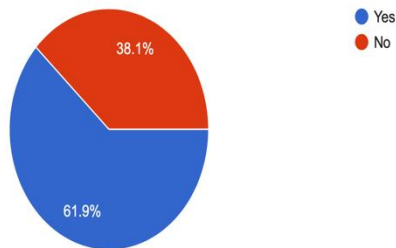
With regard to clarity on which agencies businesses require permit from, **quite a number of businesses 61.9 %, indicated having clarity.** While this represents a good percentage, as many as 38.1% of respondents indicated that they lack clarity on what kind of permits they require for their businesses. This is problematic, because it signals a situation where businesses could go on to operate without the necessary permits. It also creates frustration, delays and increase the cost of doing business; situations that increase the opportunity for exploitation and corruption.

5.2 Cases of Overlaps in the last Year

This survey shows that there has been significant improvement in this regard with 80% of respondents indicating that there were no overlaps. However, the 20 % who experienced overlaps gave examples of such overlaps as the EPA and Energy Commission's role of regulating energy efficiency, and other

cases of duplication of records and inconsistency in and between the various regulatory agencies. The findings show that overlaps and duplications are common with agencies granting permit regimes for more complex and expanse sectors such as food, travel and tourism and health. These have the tendency to engender corruption because it complicates the process of doing business in Ghana.

5.3 Duration for renewing licenses/permits and how permits are obtained

In terms of the duration required for businesses to obtain licenses and permits to operate, it was found that the general period is once a year with 71.4 % obtaining and renewing on an annual basis. Only 3 companies representing 16.7% do so on a monthly basis. Although this does not appear to be problematic, it could present lots of frustration for businesses, while creating corruption opportunities for agency staff, considering that most businesses (63.6%) have to physically visit the agencies to obtain permits. During the COVID-19, this could have created major obstacles for businesses and endangered the lives of patrons of public services. **Businesses would want government to simplify the processes for renewing these permits and licenses, by making it possible to obtain permits electronically.**
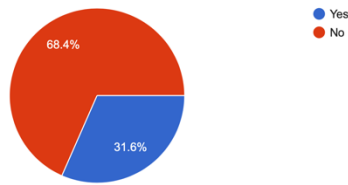
5.4 Improvements in the last year and recommendation for further improvement

As indicated earlier, regulatory agencies appear not to be making significant changes to their operations as 57.9% of respondents indicated that there have been no improvements since the last engagement with permit providing agencies. The 42.1% that experienced improvement cited examples such as they are able to now operate without any problems, enhanced system updates, obtaining permits electronically, electronic engagement during the Covid-19 period, improved payroll management systems, banking clean up exercise to safeguard customer deposits and efficiency, and prompt processing of permits. **Businesses want to see enhanced digitization, branch network to facilitate clearance certificates at agencies branches, more responsiveness and provision of feedback on applications and processes, especially in cases where there are delays and clients have to wait for months without any information on what is delaying their applications and licenses.**

6.0 Multiple Taxes, fees, and charges for duplicated services

An important observation in the safe space report was that, in addition to the challenges posed by a preponderance of regulatory agencies, there is a **plethora of taxes, fees and charges** that businesses are required to pay when dealing with each agency. The report identified **twelve (12) different taxes, fees and charges** to be paid by companies at the port of entry alone.

In the last year, have there been changes in the duplication of payments to different agencies for similar services?
19 responses

- Yes
- No

68.4%

31.6%

Per your experiences has there been any improvement in this recommendation in the last year
18 responses

Yes — 6 (33.3%)

No — 12 (66.7%)
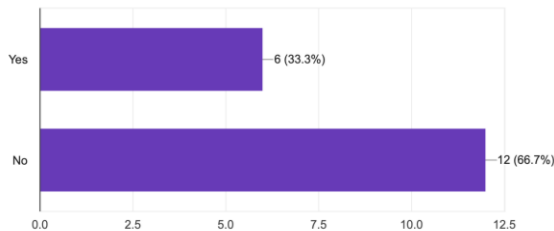
Findings of this survey show that these **multiple taxes, fees, and charges for duplicated services persist.** Businesses are still required to procure a number of services/permits in order to operate with each of them requiring some sort of fees. There is an overwhelming confirmation (82%) of businesses paying multiple taxes, with 68.4% of them indicating that they have not experienced any changes in the duplication of payments to different agencies for similar services in the past year. However, 31.6% of businesses reported of reduction in multiplicity of taxes. An example of this is the FDA which was cited for reducing their fees for registering food products.

6.1 Positive Changes observed and Recommendations for Improvement

Between the space survey and the current one, a number of positive changes were observed by businesses. Respondents observed that there has been intensive digitization of processes at the ports, and that has shortened the time for clearing goods. There has also been improvement in payroll management systems, and some agencies particularly, the Security and Exchange Commission (SEC) was cited for doing well to release regular updates/circulars to industry players on new developments and directives.

To address the challenges associated with multiple taxes, fees and charges for duplicated functions, businesses will like to see **improvement in customer services and the introduction of more technology in the work of the agencies., providing platforms for payments in a single window, decentralizing payments and digitizing all processes**.
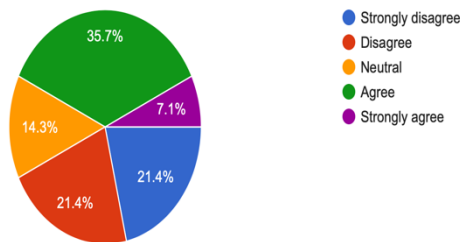
It is worthy to note that one of the critical elements that negatively affected Ghana's performance in the Ease of Doing Business report for 2020 is the **issue of multiple taxes**. For Ghana to become competitive, to attract more foreign direct investment and promote local entrepreneurship, the issue of multiple taxes must be taken seriously. The recommendation on this is reiterated as follows:

i. The Economic Management Team, which is chaired by the Vice President, should expedite the implementation of the recommendations of the Ports Fees and Charges Committee.

ii. A Committee similar to the Vice President's Committee on Ports Fees and Charges is required to review the taxes, fees and charges pertaining to each sector and across sectors to harmonise the rate of taxes, fees and charges. This Committee should have broad representations of all actors. It should be led by the Ministry of Trade and Industry, Ministry of Finance and their respective agencies with membership drawn from the various chambers of commerce and trade associations.

7.0 Multiple law enforcement agencies performing regulatory functions at the ports

Per the nature of their operations, many businesses in Ghana engage in imports and exports. The survey revealed that about 65% of businesses have imported or exported some goods in the past year with about 42.9% doing so on a monthly basis. Majority (69.2 %) of businesses import and export their items through port terminal 3, 23.1% through the old terminal and 15.4% through the Takoradi Port. 33.8 % import and export goods through the Kotoka International Airport (KIA). About 68% indicated that they had used the ports after the implementation of digitization. Currently, it takes between 2-14 days to clear items at the ports. Although Ghana's time of up to 14 is lower than the African average of up to 20 days, **Other international ports take up to 4 days and Ghana cannot be considered a competitive port in spite of the paperless innovations at our ports.**

Processes at the ports have improved
14 responses

- Strongly disagree
- Disagree
- Neutral
- Agree
- Strongly agree

35.7%
7.1%
14.3%
21.4%
21.4%

7.1 Mode of Payment

The main mode of payment for services at the ports is electronically, through bank and bank transfers. Most businesses 69.2% acknowledged that the payment methods were usually published and they knew about the amount beforehand. There is high level of transparency but there is a significant need for improvement in the publication of fees to ensure patrons know this ahead of time. **An area of concern for businesses is when they have to make other undocumented payments during the process, particularly at the point of release of goods and services. The National Security, FDA, GSA are some of the agencies that were mentioned as culpable of these acts.**

7.2 Improvement in processes at the Ports

In terms of improvements in the processes at the ports, the experiences of businesses surveyed were fairly balanced. While some businesses felt that there has not been any improvements in the last year, others pointed to some improvement. Major improvements include drastic reduction in the number of days for clearing goods, lessening of the physical stress at the ports and a general ease and timely clearance of goods. The general sentiment was that staff at the ports are helpful, and they provide clarity and swift execution of business at the ports.

To further improve operations at the ports and entry points, businesses will like Government to pay attention to a number of areas:

- Pre-informed strategies and professional support in introducing change at the ports

- Human resource training
- Standardizing valuation of goods
- Agencies checking documentation in the system before valuation and not at the port
- Total digitization to eradicate the human element and interface in interactions
- Fast track clearance processes
- Quality assurance and oversight by an independent consultant to digitization programmes
- Training to do away with primitive habits
- Engage freight forwarders on the agencies that have to be at the port.

Following from these findings, the recommended policy actions still appear relevant. These are:
  i. There should be a merger of all security agencies operating at the ports.
  ii. CCTV cameras should be installed and be operational at all times in all security offices.
  iii. Swift and hefty sanctions should be imposed on security officials who are found engaging in corrupt activities.
  iv. The activities of task-forces should be streamlined.

8.0 Lack of adequate channels for reporting

Effective channels for reporting corruption, where there is high probability that action will be taken often encourages victims of corruption to report. **This survey revealed that unofficial payments is still high at agency levels. A significant percentage (41.2%) of businesses admitted ever being in situations where they were asked for an unofficial payment for a service**. Agencies which were cited for such situations include the DVLA, National Security, CEPS, GRA, and other agencies at the ports. In addition, there are situations where **businesses felt compelled to make unofficial payment to facilitate a service**. These situations include delayed processes at the CEPS point- where business had to pay something to national security officials and other staff of ministries, departments and agencies. On other occasions, some businesses were requested to make a payment or donation as "thank you" after a service. A number of respondents have **paid money without solicitation to facilitate and speed up processes and as a token amount for fuel**.

Table 2: Lack of or inadequate channels for reporting Source: PSACG Survey

Question	Response (%)	
	Yes	**No**
Have you been in a situation where you were asked for an unofficial payment for a service?	41.2	58.8
Have you ever been in a situation where you felt compelled to make an unofficial payment to facilitate a service?	26.3	73.7
Have you ever been in a situation where you were requested to make a payment or donation as thank you after the service?	33.3	66.7
Have you ever done any of the above without solicitation?	28.6	71.4
Have you ever reported a situation where you were faced with corruption in any form in going about your business?	15.8	84.2
In the institutions you engage with, are you aware of any reporting mechanisms?	15	85
If no, do you feel that your report will be dealt with adequately if you make it?	22.2	77.8
Do you think there should be a digital reporting mechanism?	95	5
Would you use such a platform?	90	10
Who do you think should manage such a platform? Government/Independent NGO	Government 5	Independent NGO 95
Per your experiences has there been any improvement in this recommendation in the last year?	29.4	70.6

In spite of the indications given by businesses that they faced situations of corruption in going about their business, most of them (84.2%) have not reported these situations. This was mainly because businesses are **unaware of any reporting mechanisms** in the institutions they engage with and they did not know how to report it. Even the small percentage who are aware of reporting mechanisms had never used it. **77.8% of businesses did not have any incentives to report because they felt that their report will not be adequately dealt with**.

8.1 The need for a digital reporting mechanism

Given the lack of awareness of reporting mechanisms in government agencies and the reluctance of businesses to report, **there is the need for a digital reporting mechanism. 95 % of businesses indicated that they would want a digital reporting mechanism**.

On whether or not such a mechanism should be at the national level where all reports can be channeled to, or at local agency levels, there was a preference for the national level with 69.3% of the responses. Most businesses (90 %) would use such a platform if it is established. However, an overwhelming majority of businesses 95% of them preferred **an independent non-Governmental organization over government** to manage such a platform, Several reasons were cited for this overwhelming preference. They include;

- To ensure trust and responsiveness
- The anxiety that when left to Government, it may massage report to inure to its advantage
- Government may cover up, shield its officials and politicize reports and complaints.
- Independent and non-governmental bodies will be more non-partisan

- To ensure transparency and prevent government from interfering with its work.

This verdict on who to manage the digital corruption platform, there is clear evidence of lack of trust for government to effective deal with reported incidences of corruption.

8.2 Positive changes observed

Findings of the survey indicate that there has been some improvements and positive changes since the implementation of recommendations of the safe space survey report. 68.8% of respondents reported experiencing changes while 31.3% of respondents thought otherwise. The positive changes include the creation of an electronic platform by agencies to share challenges, speedy clearance of goods and drastic reduction of physical stress at the ports.

To address the persisting challenges, businesses recommend that Government does the following;
- Provide avenues for easy and confidential reporting of fraud or wrong doing
- Ensure seamless and transparent processes
- Improve on transparency within its agencies by instituting further anti-corruption systems and enforce them
- Improve upon internet connectivity in Ghana
- Sensitize public officers working in regulatory institutions and other public institutions of applicable laws for effective compliance.

9.0 Corruption relating to COVID-19

The pandemic has created unique challenges for transparency and accountability. Governments are doing what it takes to extend massive economic support packages to people and firms in record time. The exceptional response in terms of scale and speed has challenged traditional approaches to ensuring transparency, public accountability, and maintaining institutional legitimacy. To some extent, the pandemic has disrupted to varying degree the regular functioning of state institutions and affected key government functions and processes. The need to respond quickly and with drastic measures has also created additional risks for institutional processes in both public and private organization especially in post-restrictions era. This has heightened risks to accountability and integrity, including through greater opportunities for fraud and corruption.

Although COVID-19 brought most businesses to a standstill, findings of the survey suggest that there has been some engagement with public sector institutions during the period. 57.9 % of businesses had engaged with public sector institutions during the period. This shows an average engagement with public sector institutions during the COVID-19 pandemic period. During the interactions, businesses indicated experiencing some corrupt practices. They include; purchase of PPE's at Ghana Health Services, supply of medical oxygen to hospitals, giving out contracts on condition of backflows to the officer(s); arbitrary charges.

10.0 Policy Recommendations and Conclusion

Based on the experiences of this survey, which shows that a number of the recommendations in the original report to the vice president remain to be fully implemented, the following recommendations are proposed:

i. Deploy a national digital and web monitoring and complaints system for reporting service ineptitude and corruption. Effective monitoring and feedback on corruption complaints is helpful in establishing trust among complainants. The use of technology in public agencies will provide a reliable means of accessing complaints at a centralized point, as well as sharing information to all relevant decision makers for quick response. This has the potential to support the implementation of the Whistleblower Act of 2006, (Act 720)

ii. There is the need for a digital mechanism (national hotline), for reporting corruption, managed by an independent non-governmental organization

iii. Implement the Anti-Corruption Action Plan (NACAP) in close collaboration with the private sector

iv. The appeal processes for the resolution of complaints must be clearly stated and communicated to all stakeholders

v. Institute an annual mandatory ethics training for all public servants. This could be done through an online self-administered training that all public servants must enrol in at the beginning of each year

vi. All state agencies, especially the service delivery agencies, should institute and enforce gift policies

vii. The Government should empower CHRAJ to monitor the provision of administrative services and corruption complaints. CHRAJ should be well-resourced and mandated to prepare a separate annual report on corruption in administrative agencies to be submitted to the Office of the President; and copied to Parliament

viii. Institute a formal, objective and transparent performance review of public agencies with the aim of reducing corruption during the course of service delivery

ix. The heads of agencies that emerge as the most corrupt agencies from studies such as Afrobarometer should be mandated to submit an anti-corruption strategy to the presidency on how to reduce corruption. The implementation of the strategy should be monitored

x. Parliament should pass the Code of Conduct for Public Officers Bill, which is currently in Parliament. After it is passed, it should be enforced.

11. Conclusions

Corruption is a very sticky and enduring canker which has been classified as a "wicked problem". It changes form and metamorphoses into different shapes when it gets tackled. As a result, it is important to keep the pressure on government and its agencies to ensure that progress made is sustained. The findings and analysis gleaned in this study lend credence to this position. It is clear that while some modest gains have been made within the past year to address the constrains to doing business in Ghana, a lot more will have to be done to alter the structural impediments as well as the contexts within which corruption occurs. It can therefore be concluded from the results of the survey that there has been some progress in addressing some of the concerns businesses face about the impact of corruption on businesses. Although the survey respondents are fairly diverse and spread across sectors and nature of business, it is important to note that the limited number of respondents could limit the generalization of the results of the survey. It is highly recommended that a nationwide survey be conducted, and which must also be longitudinal in nature, where a selected group of businesses would be studied over a long period of time. This would ensure consistency in basis of assessment by respondents.