

Independent Reporting Mechanism

Results Report:
Sierra Leone 2021–2023

Open
Government
Partnership



Independent
Reporting
Mechanism

Executive Summary

Sierra Leone’s fourth action plan saw a high level of implementation and notable early results. Coalitions of reformers increased civil society engagement in parliamentary activities and advanced legal reforms to open the extractives sector. The 2023 elections spurred electoral reforms while also delaying implementation of some commitments. The Sierra Leone OGP Secretariat and Steering Committee continued to oversee a collaborative and transparent OGP process.

Early Results

Sierra Leone’s fourth action plan saw strong early results. Under Commitment 1, civil society engagement with parliament was formalized through the establishment of a CSO Desk and the Parliamentary Civil Society Network. Greater inclusion of civil society in parliamentary discussions and deliberations was already evident during the action plan cycle.

Notable progress in strengthening extractive sector transparency includes enactment of the Mines and Minerals Act (2022) and review of the Sierra Leone Extractive Industries Transparency Initiative (SLEITI) Bill, Companies Act (2009) and Extractives Industry Transparency Initiative (EITI) Open Data Policy.

The legal framework advanced under Commitment 4 now mandates publication of beneficial ownership (BO) information in the extractive sector.

Sierra Leone also achieved moderate results in increasing access to justice under Commitment 2 and strengthening electoral integrity in Commitment 3. Progress was made towards free, open and fair elections during the June 2023 elections. However, opportunities remain to address legal inconsistencies and strengthen the results management process.

Completion

All commitments achieved a substantial level of implementation. Organised coalitions of reformers were a driving factor behind open extractives and open parliament reforms.

Participation and Co-Creation

The National Council for Civic Education and Development continues to host Sierra Leone’s OGP Secretariat under its mandate to strengthen democratic processes through civic education.¹ The NaCCED Chairman serves as the OGP Point of Contact. The OGP Coordinator and Steering Committee oversaw a collaborative process to develop the action plan. Strategic outreach efforts throughout the action plan cycle included a national OGP symposium, high-level stakeholder engagement and public consultations on mainstream media and social media.²

IMPLEMENTATION AT A GLANCE

LEVEL OF COMPLETION

4/4

Complete or substantially complete commitments

EARLY RESULTS

4/4

Commitments with early results

2/4

Commitments with significant early results

COMPLIANCE WITH MINIMUM REQUIREMENTS

Acting according to OGP process.

Implementation in Context

The COVID-19 pandemic and 2023 general elections impacted the design, implementation and availability of resources for the action plan. While the elections posed a disruption to implementation generally, they also spurred electoral reform seen under Commitment 3. Despite these challenges, a substantial level of implementation was achieved across commitments.

¹ 'About Us', National Council for Civic Education and Bureacracy (NaCCED), <https://www.nacced.gov.sl/about-us/>.

² 'Open Government Partnership (OGP)', NaCCED, <https://www.nacced.gov.sl/ogp/>.

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Section I: Key Observations

Commitments under Sierra Leone’s fourth action plan represent a snapshot of larger ongoing reforms that have the potential to build towards long-term ambitious aims in support of the country’s development and governance priorities. Commitments that made the most progress were supported by coalitions of reformers that came together around specific policy goals. While the June 2023 elections disrupted implementation, they also spurred inclusion of an open elections commitment.

Observation 1: Coalitions of reformers are a driving force behind commitments that achieved the most notable progress.

Open extractive and open parliament reforms were largely designed, guided and implemented by coalitions of reformers. These reformers include members from CSOs, government and international partners. The Sierra Leone Extractive Industries Transparency Initiative (SLEITI) Multi-Stakeholder Group (MSG) has been central to opening extractives management. The group’s membership was broadened in 2020 and a Terms of Reference agreed to in 2021, which has improved participation.³ The SLEITI MSG and Open Extractives Thematic Group facilitated participation in key legal reforms, provided oversight of Extractive Industries Transparency Initiative (EITI) implementation and offered technical support. A SLEITI MSG member suggested that OGP Sierra Leone could support progress by ensuring that meetings go beyond status updates to also collectively problem solve obstacles. She added that the OGP could advocate for encouraging government agencies’ continued implementation.⁴

A coalition of reformers have also driven progress on opening parliament. Reformers in civil society and the Parliament of Sierra Leone staff have worked over the last few years to establish the Parliament CSO Network, which is working to make parliament and its processes more open to citizens. Collaboration through the network and the creation of a CSO Desk on parliament grounds has resulted in more engagement with CSOs. This formal institutionalisation of civil society within the parliamentary process has produced several positive outcomes: parliamentary deliberations are more systematically informed by CSO technical reports, the parliament building is more accessible to civil society actors, and citizens and CSOs have easier access to parliament.⁵ Advocacy by the coalition also facilitated members of parliament to advance stalled legislation, such as the Gender Equality Act.⁶

Observation 2: Continuation of commitments across action plans builds towards ambitious long-term reforms.

Progress under this action plan is a snapshot of larger ongoing reforms in Sierra Leone. Most commitments build on the previous action plan and are continued under Sierra Leone’s fifth action plan, which will be the country’s first four-year plan. This longer time frame enables reformers to think ambitiously about how to address key outstanding elements of these reforms. The continuity can be attributed to ongoing commitment from key reformers, consistent funding from development partners and alignment of commitments with national priorities.

Each commitment owner appreciated the progress so far while being very clear of the hurdles to be jumped. These hurdles included addressing concerns that transparency could lead to negative

criticism, needing greater consistency of extractives data across government agencies and banks, and tackling private sector hesitancy around the beneficial ownership (BO) register. SLEITI noted that progress made on opening extractives was a four-year journey that was still at takeoff.⁷ Notable progress was made to open parliament to civil society engagement. However, important steps like expunging Section 75 of the Standing Order remain, which could be addressed in the next action plan.⁸ The electoral process of 2023 saw improvements from 2018, but opportunities remain to strengthen electoral results management.⁹

Observation 3: Sierra Leone’s 2023 elections impacted the design and implementation of the fourth action plan.

Sierra Leone’s action plan was designed with the forthcoming 2023 general elections in mind. The Sierra Leone OGP Secretariat and Steering Committee took the elections into consideration when defining the number and type of commitments to include. In particular, drafters included the open elections commitment to address recommendations noted by domestic and international observers following the 2018 elections.¹⁰ The open parliament commitment was also included to continue advancing relations between parliament and citizens, regardless of the electoral cycle. The June 2023 elections were contested, and political tensions resulted in a period of unfilled seats in the national and subnational legislative bodies.¹¹ The election period and disputed results took some attention and time from implementation of the action plan. However, substantial progress was still made under all commitments, including those most closely tied to electoral politics. Coalitions of reformers organised around specific aims, such as extractives transparency and opening parliament, were a key ingredient to progress despite the elections.

³ EITI Secretariat, *Validation of Sierra Leone: Final Assessment of Progress in Implementing the EITI Standard*, 21 September 2022, accessed 20 March 2024, <https://eiti.org/sites/default/files/2022-10/Sierra%20Leone%20final%20Validation%20report%20%282022%29.pdf>.

⁴ Cecilia Mattia, SLEITI Multi-Stakeholder Group Member, Coordinator, National Advocacy Coalition with Extractives (NACE), written response to IRM researcher, May 2024.

⁵ Hon. Paran Umar Tarawally, The Clerk – Parliament of Sierra Leone, Rev. Alusine Diamond-Suma, Country Director Westminster Foundation for Democracy and members of ParlCSOnet, interview 12 October 2023.

⁶ ‘Sierra Leone Passes Landmark Law on Women’s Rights’, BBC, 20 January 2023, <https://www.bbc.com/news/world-africa-64348892>.

⁷ Mohamed Baimba Koroma, National Coordinator, SLEITI Secretariat, interview 12 October 2023.

⁸ Hon. Paran Umar Tarawally, Rev. Alusine Diamond-Suma, interview.

⁹ EU Election Observation Mission, *Sierra Leone 2023 Final Report, General Elections*, 24 June 2024, <https://www.europarl.europa.eu/cmsdata/279777/Sierra-Leone-EEAS-Final-report.pdf>.

¹⁰ National Election Watch (NEW), *Building on Electoral Reform Agenda: 2023 Electoral Cycle Report*, <https://nationalelectionwatchsl.org/wp-content/uploads/2024/04/NEW-2023-Electoral-Cycle-Report-3.pdf>.

¹¹ Commons Library Research Briefing. <https://researchbriefings.files.parliament.uk/documents/CBP-9829/CBP-9829.pdf>. Pg 10; Umaru Fofana, ‘Sierra Leone’s Main Opposition Party Demands Rerun of General Elections’, Reuters, 1 July 2023, <https://www.reuters.com/world/africa/sierra-leones-main-opposition-party-demands-rerun-general-election-2023-07-01/>; Afolabi Adekaiyaoja, ‘Close, Contested But Credible? Sierra Leone’s 2023 Elections’, Center for Democracy and Development, <https://www.cddwestafrica.org/reports/close-contested-but-credible-sierra-leone-s-2023-elections/>.

Section II: Implementation and Early Results

The following section looks at the three commitments that the IRM identified as having the strongest results from implementation. To assess early results, the IRM referred to commitments or clusters identified as promising in the Action Plan Review as a starting point. After verification of completion evidence, the IRM also took into account commitments or clusters that were not determined as promising but that, as implemented, yielded predominantly positive or significant results.

Commitment 1: Open Parliament

[Westminster Foundation for Democracy (WFD), OGP Steering Committee, OGP Parliamentary Working Group]

Context and Objectives:

Parliaments are critical for open government as they are responsible for representing the electorate, making laws and providing oversight to the executive. Opacity around these key functions can harm public trust and keep the public to the margins of governance.¹² The Parliament of Sierra Leone has made strides to increase public information on its activities. However, reformers identified a need to create mechanisms for civil society and the public to engage with parliament directly.

This commitment aimed to build a stronger relationship between parliament, citizens and civil society organisations (CSOs) by providing avenues for dialogue and collaboration. It introduced ambitious aims built on a previous commitment in Sierra Leone’s 2019–2021 action plan.¹³ This reform was included in response to CSO reports raising concerns about parliament’s transparency and accountability.¹⁴

The eight milestones to address these concerns included hosting half-yearly forums between CSOs and parliament; establishing a fully equipped CSO Desk in parliament; reforming and strengthening the budget-making process by expunging Section 75 of the Standing Order; training members of parliament on the roles and responsibilities of CSOs; establishing a parliamentary-CSO joint oversight committee; erecting service charters in the four regions; setting up a database management system, with analysis supporting citizen’s accessibility; and making parliament annual reports public through different platforms.

Early Results: Significant Results

Significant progress has been made in opening parliament, bringing about meaningful changes in practices that could strengthen trust between citizens and the state. This commitment achieved a substantial level of completion, standardising means of parliament and civil society engagement through a CSO Desk and joint committee. Parliament staff and CSO representatives of Parliament CSO Network (ParlCSOnet)¹⁵ reported regular discussions and meetings between parliament and civil society throughout implementation. Ongoing efforts and Sierra Leone’s fifth action plan indicate that there is commitment by the parliament and CSOs to sustain these practices.

The Parliament of Sierra Leone had established some channels for public information before implementation of this commitment. Parliament had launched the Sierra Leone Parliament App, established a 15-member OGP Parliamentary Working Group involved in crafting the commitment and its implementation,¹⁶ launched the Parliamentary Service Charter, and hosted the first parliamentary Open Day. In addition to these efforts, parliament live streamed hearings on Facebook, and the working group and parliament leadership participated in study tours.¹⁷ These prior activities formed a solid foundation to go beyond releasing information to establishing permanent channels of collaboration and dialogue between parliament, the public and CSOs.¹⁸

A CSO Desk was established on 16 November 2022 (milestone 2). The Speaker of Parliament lauded the launch as a first step towards fulfilling commitments made to strengthen parliament and CSO relations.¹⁹ Civil society had highlighted the CSO Desk as a priority at an August 2021 meeting that included civil society representatives from across the country.²⁰ The CSO Desk is located within the parliament compound but separate from the main building. This arrangement aims to balance accessibility to parliament with independence and freedom for CSOs to engage with the office. The desk has two staff members, one dedicated from parliament and one from CSOs.²¹ A logo was designed,²² a term of reference for technical support was developed,²³ and a WhatsApp group was formed to foster communication. The desk has a membership of 42 CSOs that are representative of the districts. The Centre for Strategy and Parliamentary Studies developed a training manual, which was used to train about 50 CSOs to fully engage with parliament.²⁴ The CSO Desk focuses on public education on the roles and responsibilities of parliaments, ensures access to the parliament compound, and shares information with CSOs, members of parliament, and sectoral committees in deliberations that affect citizens.²⁵

A steering committee, known as the parliament, Civil Society Organization Network (ParlCSOnet), was established to oversee parliament-civil society relations, including the CSO Desk (milestone 5). This joint oversight committee includes 20 members, 6 members of parliament, 6 leaders of selected CSOs; 2 staff of the Department for Programmes, Research and Partnership, with the director serving as secretary to the committee; and 6 representatives of development partners.²⁶ A collaboratively developed Terms of Reference²⁷ outlines membership, formation of technical clusters, frequency of meetings and roles and responsibilities of the actors. Parliament staff specifically have a greater opportunity for CSOs to share sector research reports to inform decision-making and oversight. Parliament intends to integrate the committee into the standing orders of parliament, which were under review.²⁸

CSOs and the Clerk of Parliament noted that the CSO Desk and engagement of CSOs through ParlCSOnet is founded on clearer understanding of each other's roles and responsibilities. The desk has structured engagement, making it valuable and predictable, and includes regular meetings and engagement through the parliamentary sectoral committees. The Clerk of Parliament²⁹ shared that because of improved CSO-parliament engagement through ParlCSOnet and the Joint Oversight Committee, for the first time, a CSO's research report on the impact of free education and health on citizens was discussed in Parliamentary Chambers. Before this, parliament would not discuss reports from non-statutory bodies, thus excluding civil society input.

ParlCSOnet has also participated in various discussions with parliament³⁰ (milestone 1). For example, ParlCSOnet engaged in a meeting where CSOs and parliamentary members of the Committee on Gender and Children Affairs discussed the review of the Child Marriage Bill.³¹ WFD hosted several meetings that raised awareness of the roles and responsibilities of CSOs in the

legislative process.³² Parliament hosted sessions that updated CSOs on implementation of OGP commitments and facilitated discussions between CSOs and parliament on how CSOs could work better with parliament.³³

Progress was limited under milestone 6 to establish service charters in South, North, Northwest and East regions (milestone 6). In May 2022, WFD hosted a meeting to review the service charter.³⁴ At the time of writing, the new parliament was expected to continue and complete the review process, and the charter will be erected in the four regions. In addition, annual reports were to be published each year on various platforms (milestone 8). At the time of assessment, the parliament website included a 2021 report,³⁵ and the 2022 report was under evaluation.³⁶

Parliament also committed to reviewing Section 75 of the standing orders³⁷ (milestone 3). The order prohibits publication of select committee reports before committee proceedings are reported in parliament. At the time of assessment, Section 75 was still in effect. Two meetings, supported by WFD, were hosted to review the standing orders. The review process was at the Parliamentary Committee on Standing Orders undergoing scrutiny as there remained outstanding issues.³⁸

Lastly, parliament made progress in setting up a data management system (milestone 7). WFD trained designated staff in February 2022 and distributed iPads for data collection.³⁹ A Citizen's Accessibility Data Management System, info pack and forms were developed in collaboration with WFD, the Public Relations Unit, the Department of Parliamentary Assistance and Coordination, and the Sergeant at Arms Department.⁴⁰ Analysis of the data is intended to inform decisions such as how to improve access for persons with disability. This included a data collection form that every person fills upon arrival to parliament.⁴¹ Data collected include date of visit, sex, age, disability, nationality, institution, purpose, and time in and out. In 2022, an analysis was conducted on visitors to parliament.⁴² This report highlighted information on the different categories of people visiting parliament, organisations represented, ages, and departments visited, and identified regular users, among others.

Looking Ahead:

The Parliament of Sierra Leone has made notable progress towards opening parliament, particularly in fostering productive dialogue between civil society and parliament. This reform has been included in the 2024–2028 Action Plan with milestones that focus on the development and launch of an online Legislative Transparency Portal, establishment of a Citizen Feedback Mechanism, implementation of measures to promote enhanced budget transparency, launch of open data initiatives, and strengthening of oversight mechanisms through training programmes among others.⁴³

The IRM presents the following recommendations for consideration to further institutionalise progress made:

- Expunge Section 75 of the Standing Order to enhance budget transparency and citizens' engagement through the budget cycle. The Open Budget Survey 2021 notes this as a key step to enable CSOs and citizens to testify during budget proposal hearings prior to its approval.⁴⁴
- Expand the scope of information published on parliament's website beyond parliament's budget to include budget implementation reports, bids, contracts, etc. WFD also recommends the potential use of technology such as AI and chatbox to optimise access to information and citizen interactions.

- Establish closer collaboration with the media (new and traditional media – mainstream and local radio stations). The Africa Open Parliament Index 2022 report notes that there is an opportunity for the Parliament of Sierra Leone to improve on parliament media relations.⁴⁵ This could further aid in building trust between citizens and parliament.
- ParlCSOnet has already enhanced collaboration amongst parliament, CSO and citizens. Continued engagement on the National Action Plan V milestones can aid collaborative implementation. Additionally, ParlCSOnet could explore ways to bring the public's voice, not just civil society, into relevant national discussions in parliament, such as social audits or surveys.

Commitment 4: Open Extractives

[Sierra Leone Extractive Industries Transparency Initiative (SLEITI), National Advocacy Coalition on Extractives, Natural Resources Governance and Economic Justice Network, Human Rights Defenders Network, Women on Mining and Extractive, Sierra Leone Chamber of Mines, Initiatives for Media Development]

Context and Objectives:

This commitment focused on engaging relevant agencies and stakeholders to enhance transparency and accountability in the extractive sector. It aimed to make EITI reporting simpler, timelier and more cost-effective. It also sought to shift stakeholders (citizens, CSOs, media, companies and investors) from collecting to using extractives data. Finally, the commitment aimed to increase public trust of government and companies as citizens meaningfully engage in extractive sector management.⁴⁶

Before implementation, the IRM evaluated this commitment as having substantial potential for results.⁴⁷ Its ambition lies in its objective to strengthen the legal framework and technical infrastructure to ensure ongoing and comprehensive information disclosure. For legal reforms, milestones focused on updating the Open Data Policy, mandating BO disclosure, redrafting and passing the SLEITI Bill, and passing the New Mines and Minerals Development Bill. To publish BO information, reformers ensured milestones focused on publishing all oil, gas, and mining licences and contracts in exploration and production on a publicly accessible government portal and disclosing up-to-date information on operations (e.g. government revenue data, sub-national revenues) in the extractives sector across government agencies.

Opening the extractives sector has been a key area for reform in Sierra Leone. The extractives sector accounted for 67% of Sierra Leone's exports in 2019.⁴⁸ Extractives also played an influential role in the Sierra Leone Civil War (1991–2002). It is worth noting that the country has been a member of EITI since 2008. Opening extractives has featured in all actions plans, including the fifth national action plan 2024–2028. Sierra Leone's EITI Multi-Stakeholder Group sits within the Office of the Vice President. Despite progress, gaps in extractive governance that this commitment aimed to address an explicit legal requirement for mandated BO disclosure, limited use of disclosed information by citizens and CSOs to push for better extractive governance, and limited routine disclosure of contracts and revenues, especially at subnational levels.⁴⁹

Early Results: Significant Results

This commitment achieved significant progress towards transparency in the extractives sector. Notably, the Parliament of Sierra Leone’s passage of the Mines and Minerals Development Act (2022) now mandates the collection and disclosure of information on the beneficial owners of companies in the extractives sector. Government and civil society partners have begun steps to establish a BO register. The SLEITI Bill was collaboratively drafted and reached the stage of government review before parliamentary consideration. Disclosure of extractive sector licences and contracts also improved through the SLEITI process. This commitment achieved a substantial level of completion during the implementation period and is continued in Sierra Leone’s 2024–2028 Action Plan.

Sierra Leone’s 2022 EITI Validation Report indicates progress made early in the implementation period. Sierra Leone scored an average of 87.5⁵⁰ out of 100 points assessed on the three components of stakeholder engagement, transparency and outcomes.⁵¹ The report highlighted greater engagement across government agencies and CSO involvement in EITI implementation, including broader EITI MSG membership. The report also noted improved disclosure related to subnational payments and transfers.⁵²

The SLEITI national coordinator noted that progress in legal reforms and systematic disclosure was a four-year journey requiring engagement of a multiplicity of stakeholders. He stated that there were transitions within government leadership and resistance from private companies, which did and may continue to influence progress.⁵³ While more is still required to ensure systematic disclosure of all oil, gas and mining licences and to encourage data analysis so far, the progress made demonstrates institutionalisation of BO and open data disclosure.

Strengthening the open extractives legal framework

Sierra Leone has made notable progress in strengthening the legal framework for extractives transparency by updating the Open Data Policy, enacting the Mines and Minerals Development Act, and drafting the SLEITI Bill. Civil society have been highly involved in drafting and providing input on new and amended legislation.⁵⁴

Sierra Leone reviewed and updated the EITI Open Data Policy (milestone 1). The policy set a foundation for the access, use and reuse of data by adopting a set of principles that guide the release of existing and new data sets under EITI.⁵⁵ Meetings were held to orient members of the SLEITI MSG towards open data. The first was hosted on 5 August 2021 and attended by key MSG members – representatives from the Office of the Vice President, the Ministry of Mines and Mineral Resources, the Chamber of Mines, CSOs and the Sierra Leone Association of Journalists. These meetings sought to sensitise and build the capacity of MSG members to govern the EITI process effectively and efficiently.⁵⁶ As of publication of the 2022 EITI Validation Report, implementation of the Open Data Policy was underway.⁵⁷

The Parliament of Sierra Leone enacted the Mines and Minerals Development Act (2022)⁵⁸ in August 2022 (milestone 6). The Act mandates BO reporting by companies and disclosure by government and companies (milestone 3). The Act sets the legal framework for companies to disclose their beneficial owners. It defines a beneficial owner and provides guidance on disclosure. Section 160 mandates companies to report on BO and relevant government agencies and companies to disclose BO information in the extractives sector. The law was developed through consultation with government and nongovernment actors. These include the policy department at

the Ministry of Mines and Mineral Development; the National Mineral Agency, which is the regulatory agency; CSOs; citizens through national wider consultations;⁵⁹ the Law Office; SLEITI who focused on ensuring the BO was included in the law; Cabinet where the law was tabled, reviewed and approved; and finally, parliament.⁶⁰

Following enactment, the Government of Sierra Leone initiated institutional changes to operationalise the Mines and Minerals Development Act. The Act established a Minerals Advisory Board, which includes civil society representation.⁶¹ There is a Beneficial Ownership Technical Working Group composed of the Bank of Sierra Leone, Financial Intelligence Unit, SLEITI, Ministry of Finance, National Mineral Agency, National Revenue Authority, and National Advocacy Coalition on Extractives.⁶² The Finance Intelligence Unit, Bank of Sierra Leone and Sierra Leone Commercial Bank have begun to incorporate BO in their requirements. The National Investment Board will host the BO register once the Board is fully established. Stakeholders agreed that development of the register would require a collaborative approach, including SLEITI, the Financial Intelligence Unit and the Central Bank of Sierra Leone. The SLEITI national coordinator highlighted that the passage of the Act was a significant accomplishment. However, there was a need to urgently enforce it with a regulatory framework. Regulations would help to specify the information the BO register would include where it would be stored, how it would be accessed, clarity on the bare minimums of data required, and sanctions if public and private companies do not comply, among other key decisions.⁶³ The National Coordination for the National Advocacy Coalition with Extractives stated that the National Ministry of Mines was drafting regulations.⁶⁴

At the same time, government and partners commenced a review of the Companies Act (2009). This review aimed to ensure the Act mandates disclosure of beneficial owners for all oil, gas and mining companies in private and public sectors.⁶⁵ The changes also intend to require BO disclosure to register a business.⁶⁶ The review was put on hold to allow for the establishment of the National Investment Board, which will host the Business Registration Unit.⁶⁷ At the time of writing, the review was in the final stages and was with the Attorney General's Office.⁶⁸ Initial conversations have also identified a need for an overarching BO policy, which will be brought to the attention of the vice president.⁶⁹

Finally, the SLEITI Bill⁷⁰ (milestone 5) was drafted by civil society and shared with government and other stakeholders for input, including the EITI International Secretariat.⁷¹ Comments received were incorporated in the draft and reviewed by the MSG on 5 October 2023. At the time of assessment, the next step was submission to the Law Officers Department.⁷² Parliament requested the draft bill to ensure alignment with existing laws.⁷³ The bill aims to address gaps in the Mines and Minerals Act, such as expanding on provisions for BO disclosure to include politically exposed persons and establish penalties for noncompliance. The bill will also establish SLEITI's enforcement powers around transparency and accountability requirements in the extractives sector.⁷⁴

Systematic and comprehensive information disclosure

SLEITI's engagement with government agencies in the extractive sector has contributed to progress in information disclosure. Since the 2018 EITI validation, disclosure has improved significantly on laws, licences and contracts.⁷⁵ Mining companies regularly report to National Minerals Agency (NMA) production, exports and subnational payment data. However, there is an opportunity for NMA to systematically disclose this information in an open format. SLEITI published data from the 2019 SLEITI report and the SLEITI Summary Data Templates in Excel.⁷⁶ To adhere to

the EITI Open Data Policy and systematically disclose all oil, gas and mining licences and contracts, the NMA continues to update the online repository first launched in 2012.⁷⁷ This data is published directly from the Mining Cadastre Administration System (MCAS) system,⁷⁸ which manages all licences.

The NMA registry provides information on start date, licence code, name of owner, type, status of licence, province and asset. At the time of preparing this report, the dashboard provided an overview of total revenue in USD and Sierra Leone; total number of owners, applications and licences; and status of licences.⁷⁹ The map provides details and locations on 1,340 active licences, 197 active applications and 26 assets. The NMA provides active and past mining lease agreements on their website.⁸⁰ The NMA has met with civil society to provide training on data use and information updates. The Bank of Sierra Leone publishes data on production and export. However, the data is not published regularly. EITI recommends that NMA and the Bank of Sierra Leone collaborate and coordinate towards systematic and proactive disclosure. A representative of NACE reports that the Office of Vice President is spearheading consultations among actors to ensure that the sector's disclosures are timely and relevant.⁸¹

During the implementation period, the development of templates and legal provisions for systematic disclosure of up-to-date information of national and subnational revenue in the extractive sector was not started (milestone 4).⁸² This gap has contributed to the challenges experienced by SLEITI, CSOs and citizens in accessing information on extractives. Disclosure practices are not institutionalised, leaving regularity, timelines, detail of information and sanctions unclear. As a result, the EITI report often becomes a central source of information rather than a supplement to systemic and timely disclosure by relevant agencies. As the EITI report takes years to produce, the content is often unavailable in time to support informed public participation. SLEITI noted that there is a need for better coordination and collaboration in publishing information between the NMA and Bank of Sierra Leone to ensure consistency in public information on extractives.⁸³

The MSG flagged its commitment to continue its engagements with the NMA and Ministry of Mines and Mineral Resources to develop templates and policies that fully disclose up-to-date allocations into the Diamond Area Community Development Fund account and disbursements to chiefdoms and districts.⁸⁴

The SLEITI National Coordinator outlined obstacles to extractives reform, including funding, institutional buy-in and coordination across relevant government agencies.⁸⁵ The National Coordinator for NACE added that OGP meetings are often focused on status updates rather than problem-solving. She expressed a desire for OGP Sierra Leone to provide a space to determine how to navigate obstacles and help with advocacy to necessary institutions to drive implementation. This would help to ensure that the OGP process facilitates extractives reform rather than adding work. She added that the Office of the Vice President could convene lead government agencies to encourage higher ownership and implementation.⁸⁶

Looking Ahead:

Notable progress has been made on this commitment to establish legal framework and processes to disclose key extractives data. However, opportunities remain to ensure access to timely and complete data in accessible formats and encourage use of data. This commitment is continued in Sierra Leone's 2024–2028 Action Plan, focusing on passage of the SLEITI Bill and implementing

systematic publication of extractives sector data.⁸⁷ Considering this commitment’s continuation, the IRM offers the following recommendations:

- **Substantive law and regulatory framework to mandate BO disclosure:** The passing of the Mines and Minerals Development Act (2022) presents a solid foundation to mandate BO disclosure. This can be reinforced by finalising the review of the Companies Act (2009), with stakeholders collaboratively developing and passing BO legal framework, and sensitising stakeholders across the country on the importance of the BO register.
- **Development of a public BO register and enforcement of companies’ disclosure.** Examples from the region include Ghana,⁸⁸ Nigeria⁸⁹ and Liberia⁹⁰ on translating laws into public BO registers.
- **Adopt a policy for systematic disclosure:** Sierra Leone 2022 Validation Report⁹¹ recommends strengthening systematic disclosure by institutionalising the practice of contract disclosure and BO. This is considered in the National Action Plan V 2024–2028.⁹²

¹² Africa Open Parliament Index 2022, <https://parliamentafrica.com/africa-open-parliament-index-2022-final-report-english/>.

¹³ Independent Reporting Mechanism (IRM), *Action Plan Review: Sierra Leone Action Plan 2021–2023*, https://www.opengovpartnership.org/wp-content/uploads/2023/03/Sierra-Leone_Action-Plan-Review_2021-2023.pdf.

¹⁴ Open Government Partnership (OGP), *Sierra Leone National Action Plan IV 2021–2023*,

https://www.opengovpartnership.org/wp-content/uploads/2022/03/Sierra-Leone_Action-Plan_2021-2023.pdf.

¹⁵ Hon. Paran Umar Tarawally, The Clerk – Parliament of Sierra Leone, Rev. Alusine Diamond-Suma, Country Director Westminster Foundation for Democracy and members of ParlCSOnet, interview 12 October 2023.

¹⁶ Rev. Alusine Diamond-Suma, Country Director Westminster Foundation for Democracy and members of ParlCSOnet, Interview 12 October 2023.

¹⁷ IRM, *Action Plan Review: Sierra Leone Action Plan 2021–2023*.

¹⁸ IRM, *Action Plan Review: Sierra Leone Action Plan 2021–2023*.

¹⁹ Office of the Clerk of Parliament, ‘Speaker of Sierra Leone Parliament Launches the CSO Desk in Parliament’, 16 November 2022,

https://www.parliament.gov.sl/uploads/press_release/pdf/SPEAKER%20LAUNCHES%20CSOs%20OFFICE%20IN%20PARLIAMENT-%2016th%20NOVEMBER%20,%202022.pdf.

²⁰ ‘Synopsis of Reports Related to Parliamentary Engagement with CSOs (ParlCSOnet)’, Parliament of the Republic of Sierra Leone, https://www.parliament.gov.sl/uploads/other_resources/REPORTS%20-PARLIAMENT%20&%20CSO.pdf.

²¹ Presentation during interview with Hon. Paran Umar Tarawally, The Clerk – Parliament of Sierra Leone, Rev. Alusine Diamond-Suma, Country Director Westminster Foundation for Democracy and members of ParlCSOnet, interview with IRM researcher, 12 October 2023.

²² Parliament CSO Network Sierra Leone (@ParlCSOnet), ‘A Network developed by Parliament and CSOs in Sierra Leone to promote openness and inclusion through the @opengovpart. An initiative of @WFD_SierraLeone’, X, January 2023, <https://twitter.com/ParlCSOnet>.

²³ Parliament of the Republic of Sierra Leone and ParlCSOnet. ‘Terms of Reference for CSO Cluster Technical Support Operations and Management’, Document shared with IRM researcher.

²⁴ ‘Synopsis of Reports Related to Parliamentary Engagement with CSOs (ParlCSOnet).’

²⁵ ‘Parliament Endorses the CSO Desk’, AYV News Television, 26 April 2022, <https://ayvnews.com/parliament-endorses-cso-desk/>.

²⁶ Hon. Paran Umar Tarawally, Rev. Alusine Diamond-Suma, interview 12 October 2023.; IRM Researcher visit to the CSO Desk with a representative of ParlCSOnet and OGP Coordinator.; ToR for Steering Committee of the Parliament of Sierra Leone and Civil Society Organisation Network (ParlCSOnet), document shared with IRM researcher.

²⁷ ToR for Steering Committee of the Parliament of Sierra Leone and Civil Society Organisation Network (ParlCSOnet), <https://docs.google.com/document/d/1gy-fwonxWQ-e5M6Za53McXkzIwDg4eYS/edit#heading=h.gjdgxs>.

²⁸ Presentation during interview.

²⁹ Tarawally, Diamond-Suma, interview 12 October 2023.

³⁰ Parliamentary Network Africa (@PNAfricawatch), ‘Sierra Leone: Parliament CSOs Network has ended its two-days consultative engagement on the validation of the thematic sectors & Joint Actions to promote technical support to @sl_parliament.@kadijah_bangura, our Country Rep, participated’, X, 30 May 2023, <https://twitter.com/PNAfricawatch/status/1663614265171771393>.

- ³¹ Office of the Clerk of Parliament, ‘MPs and CSOs Discuss Review of Child Marriage Bill’, 27 November 2022, https://www.parliament.gov.sl/uploads/press_release/pdf/MPs%20AND%20CSOs%20DISCUSSES%20REVIEW%20OF%20CHILD%20MARRIAGE%20BILL%20-27th%20NOVEMBER,%202022.pdf.
- ³² Office of the Clerk of Parliament, ‘Westminster Foundation for Democracy Engages Parliament CSO’s Network’, 3 March 2023, https://www.parliament.gov.sl/uploads/press_release/pdf/WESTMINSTER%20FOUNDATION%20FOR%20DEMOCRACY%20ENGAGES%20PARLIAMENT%20CSO's%20NETWORK%20-%203RD%20MARCH,%202023.pdf.
- ³³ Parliament of the Republic of Sierra Leone, Parliamentary Update to ParLCSOnet on How Better CSO Can Work with Parliament, https://www.parliament.gov.sl/uploads/other_resources/UPDATE%20PRESENTATION%20TO%20PARLCSONET%20ON%20HOW%20PARLIAMENT%20&%20CSO%20CAN%20BETTER%20WORK.pdf.
- ³⁴ Presentation during interview with Hon. Paran Umar Tarawally, The Clerk – Parliament of Sierra Leone, Rev. Alusine Diamond-Suma, Country Director Westminster Foundation for Democracy and members of ParLCSOnet, interview with IRM researcher, 12 October 2023.
- ³⁵ Parliament of the Republic of Sierra Leone, *2021 Annual Summary Report of Parliament, Office of the Clerk. 2021 Theme ‘Embracing Change’*, <https://www.parliament.gov.sl/images/pdf/2021-annual-summary-report.pdf> Accessed 10 March 2024.
- ³⁶ Hon. Paran Umar Tarawally, The Clerk – Parliament of Sierra Leone, interview 12 October 2023.
- ³⁷ Parliament of the Republic of Sierra Leone, *Standing Orders of the Sierra Leone Parliament*, <https://www.parliament.gov.sl/standing-orders.html>.
- ³⁸ Tarawally, Diamond-Suma, interview.
- ³⁹ Presentation during interview.
- ⁴⁰ Parliament of the Republic of Sierra Leone, *Citizen’s Accessibility Data Management System: Information Pack*, https://www.parliament.gov.sl/uploads/other_resources/TRAINING%20PRESENTATION%20-BRIEF%20CITIZEN'S%20ACCESSIBILITY%20DATA%20MANAGEMENT%20SYSTEM.pdf.
- ⁴¹ Hard copy of form shared with the IRM Research at the interview on 12 October 2023. IRM Researcher filled this form when she visited parliament. There are manned desks at the entrance and she observed different individuals registering on the form.
- ⁴² Parliament of the Republic of Sierra Leone, *Accessibility Data Brief, March–September 2022*, https://www.parliament.gov.sl/uploads/other_resources/PARLIAMENT%20ACCESSIBILITY%20DATA%20ANALYSIS_REPORT%20LIBRARY.pdf.
- ⁴³ OGP, *Sierra Leone National Action Plan V 2024–2028*, https://www.opengovpartnership.org/wp-content/uploads/2024/02/Sierra-Leone_Action-Plan_2024-2028.pdf.
- ⁴⁴ International Budget Partnership, *Open Budget Survey, 2021*, accessed 20 February 2024, <https://internationalbudget.org/open-budget-survey/country-results/2021/sierra-leone>.
- ⁴⁵ Parliamentary Network Africa (PNAfrica) and Africa Parliamentary Monitoring Organisations network (APMON), *Africa Open Parliament Index 2022*, 27, <https://parliamentafrica.com/africa-open-parliament-index-2022-final-report-english/>.
- ⁴⁶ OGP, *Sierra Leone National Action Plan IV 2021–2023*.
- ⁴⁷ IRM, *Action Plan Review: Sierra Leone 2021–2023*.
- ⁴⁸ ‘Overview and Role of Sierra Leone’, EITI, <https://eiti.org/countries/sierra-leone>.
- ⁴⁹ OGP, *Sierra Leone National Action Plan IV 2021–2023*.
- ⁵⁰ EITI Secretariat, *Validation of Sierra Leone: Final Assessment of Progress in Implementing the EITI Standard*, 21 September 2022, 8, accessed 20 March 2024. <https://eiti.org/sites/default/files/2022-10/Sierra%20Leone%20final%20validation%20report%20%282022%29.pdf>.
- ⁵¹ Sierra Leone validation was scheduled to commence on 17 December 2020. However, in December 2020, the EITI Board [agreed](#) a revised Validation schedule, with Sierra Leone’s Validation scheduled to commence on 1 October 2021. In September 2021, the Board [granted](#) Sierra Leone’s request for an extension to its Validation deadline. The Validation commenced on 1 April 2022. Virtual stakeholder consultations were undertaken from 23 May to 3 June 2022. The draft assessment was shared with the MSG for feedback on 10 August 2022. Following comments from the MSG received on 7 September 2022, the Validation Report was finalised for consideration by the Validation Committee. <https://eiti.org/board-decision/2022-48>. Accessed 29 March 2024.
- ⁵² EITI Secretariat, *Validation of Sierra Leone*, 8.
- ⁵³ Mohamed Baimba Koroma, National Coordinator, SLEITI Secretariat, interview 12 October 2023.
- ⁵⁴ Cecilia Mattia, SLEITI Multi-Stakeholder Group member, Coordinator, National Advocacy Coalition with Extractives (NACE), interview with IRM researcher, May 2024.
- ⁵⁵ IRM, *Action Plan Review: Sierra Leone Action Plan 2021–2023*.

⁵⁶ Report of the SLEITI MSG Orientation and Refresher Workshop on the EITI Process in Sierra Leone, 5 August 2021. Report shared with IRM Researcher during interview with Mr. Mohamed Baimba Koroma, National Coordinator, SLEITI Secretariat, interview 12 October 2023.

⁵⁷ EITI Secretariat, *Validation of Sierra Leone*, 8.

⁵⁸ The Mines and Minerals Development Act 2022, accessed 27 March 2024, <https://commons.laws.africa/akn/sl/act/2023/16/media/publication/sl-act-2023-16-publication-document.pdf>.

⁵⁹ EITI Secretariat, *Validation of Sierra Leone*, 4.

⁶⁰ Koroma, interview.

⁶¹ Mattia, interview.

⁶² Mattia, interview.

⁶³ Koroma, interview.

⁶⁴ Mattia, interview.

⁶⁵ ‘Open Extractives, Monitoring Framework’, shared with the IRM Researcher by the Sierra Leone OGP Secretariat.

⁶⁶ Mattia, interview.

⁶⁷ Koroma, interview.

⁶⁸ Mattia, interview.

⁶⁹ Mattia, interview.

⁷⁰ Draft SLEITI bill with comments from the EITI International Secretariat was shared with IRM Researcher during interview with Mohamed Baimba Koroma, National Coordinator, SLEITI Secretariat, interview 12 October 2023.

⁷¹ Alpha Abu, ‘Stakeholders Meeting’, Politico SL, 9 November 2023, <https://politicosl.com/articles/stakeholders-meet-evaluate-sierra-leones-extractives-draft-bill>.

⁷² Koroma, interview.

⁷³ Mattia, interview.

⁷⁴ Koroma, interview.

⁷⁵ EITI Secretariat, *Validation of Sierra Leone*, 8.

⁷⁶ ‘Open Extractives, Monitoring Framework’, shared with the IRM Researcher by the Sierra Leone OGP Secretariat.

⁷⁷ GoSL Online Repository, <https://sierraleone.revenuedev.org/dashboard>; ‘Mainstreaming Transparency in Sierra Leone’, EITI, 17 July 2015, <https://eiti.org/blog-post/mainstreaming-transparency-sierra-leone>.

⁷⁸ The MCAS System is managed by the Mining Cadastre Office (MCO). In addition, The MCO is responsible for processing mineral rights applications, issuance and administration of licences and permits, maintenance of cadastral records, registers and maps, the receipt and safe keeping of reports. This unit sits within the Directorate of Mines at the National Minerals Agency HQ. Landing page <https://www.nma.gov.sl/mining-cadastre-office/>.

⁷⁹ GoSL Online Repository.

⁸⁰ ‘Active Mining Lease Agreements of 2021/22’, National Minerals Agency, <https://www.nma.gov.sl/active-mining-agreements/>.

⁸¹ Mattia, interview.

⁸² ‘Open Extractives, Monitoring Framework.’

⁸³ Koroma, interview.

⁸⁴ ‘Open Extractives, Monitoring Framework.’

⁸⁵ Koroma, interview.

⁸⁶ Mattia, interview.

⁸⁷ OGP, *National Action Plan V 2024–2028*. <https://www.opengovpartnership.org/documents/sierra-leone-action-plan-2024-2028/>.

⁸⁸ ‘Ghana’s Beneficial Ownership Transparency Reforms’, OGP, <https://www.openownership.org/en/map/country/ghana/>

⁸⁹ IRM, *Results Report: Nigeria 2019–2022*, https://www.opengovpartnership.org/wp-content/uploads/2023/06/Nigeria_Results-Report_2019-2022.pdf.

⁹⁰ IRM, *Results Report: Liberia 2020–2022*, https://www.opengovpartnership.org/wp-content/uploads/2023/05/Liberia_Results-Report_2020-2022_For-Public-Comment.pdf.

⁹¹ Sierra Leone validation was scheduled to commence on 17 December 2020. However, in December 2020, the EITI Board [agreed](#) a revised Validation schedule, with Sierra Leone’s Validation scheduled to commence on 1 October 2021. In September 2021, the Board [granted](#) Sierra Leone’s request for an extension to its Validation deadline. The Validation commenced on 1 April 2022. Virtual stakeholder consultations were undertaken from 23 May to 3 June 2022. The draft assessment was shared with the MSG for feedback on 10 August 2022. Following comments from the MSG received on 7 September 2022, the Validation Report was finalised for consideration by the Validation Committee. <https://eiti.org/board-decision/2022-48>. Accessed 29 March 2024.

⁹² OGP, *Sierra Leone National Action Plan V 2024–2028*, 23.

Section III. Participation and Co-Creation

Sierra Leone’s OGP Secretariat oversaw a participatory process throughout the action plan cycle through regular Steering Committee meetings and broader public consultations. Continuous monitoring and discussion contributed to the high level of implementation achieved in Sierra Leone’s fourth action plan.

OGP in Sierra Leone is domiciled within the Ministry of Information and Civic Education. The OGP Secretariat is hosted by the National Council for Civic Education and Development (NaCCED) supported by the OGP Coordinator and the NaCCED chair, who doubles up as the OGP point of contact.⁹³ The OGP Sierra Leone repository is hosted on the official website of NaCCED.⁹⁴ This ensures open access to minutes and reports on OGP activities for members of the MSF, Steering Committee and citizens.

Sierra Leone had an OGP Steering Committee with a total of 18 members with an equal number of representatives from government and civil society. This Steering Committee held two consultations when co-creating the action plan, a final validation meeting and publicized draft commitments through call-in radio programmes and social media.⁹⁵ Review of the social media accounts⁹⁶ and OGP Steering Committee minutes reveals regular consultations among stakeholders, from co-creation through implementation to evaluation of NAP IV.

A key event that promoted participation during implementation was the National OGP Symposium⁹⁷ held on 25 August 2022 at Freetown City Auditorium, which brought together 111 participants drawn from the MDAs, CSOs, media and development partners. Through the symposium, citizens were informed of the progress made in co-creation and the implementation of the action plan. It was also an opportunity to explore viable strategies to overcome challenges faced in implementation. The resolutions of the forum included engaging the Head of Civil Service and Secretary to Cabinet to push for more participation of MDAs, keeping the citizens informed and engaged using mass media, and capitalizing on the resources and expertise of development partners for the implementation of OGP commitments.

Further, the Steering Committee organised a high-level stakeholders engagement⁹⁸ to create awareness and to seek support from senior political leaders. Through the meeting, the chief minister declared the president’s commitment to OGP and urged the secretary to the cabinet and head of civil service to ensure that permanent secretaries and their deputies attend subsequent OGP steering committee meetings. This commitment was reiterated by Chernor Bah, Minister of Information and Civic Education, and Yusuf Keketoma Sandi, Deputy Minister of Information and Civic Education, during a courtesy call with the IRM researcher.⁹⁹

Across interviews with CSOs and commitment holders, each reported that there was close collaboration with the OGP Secretariat, amongst Secretariat Committee members and MSF. They lauded the strong communication from the coordinator through WhatsApp, calls and email,¹⁰⁰ who ensured that each commitment holder attended meetings, which served as spaces for accountability and the exchange of ideas.¹⁰¹ Before Steering Committee meetings, the Secretariat ensured that each commitment holder submitted regular reports using a standardized monitoring reporting tool¹⁰² and, when possible, engaged in OGP events. On the latter, Shahid Korjie,

Coordinator at the Justice Sector Coordination Office (JSCO), raised the joint presentation made at the OGP Conference in Marrakech.¹⁰³

One challenge noted was that Steering Committee meetings were often focused on providing updates rather than strategizing to advance implementation. Steering Committee members could use their collective voice to advance reforms with support from the OGP Secretariat¹⁰⁴ – for example, to strengthen BO and extractive data disclosure efforts. Consistent attendance at Steering Committee meetings was also cited as a challenge. At the January 2023 meeting,¹⁰⁵ the Steering Committee pointed out that some members (about eight) had not participated in the OGP meeting for six months. According to the OGP National Coordinator,¹⁰⁶ there have been steering committee members since Sierra Leone joined OGP in 2014, others who were brought on board in 2014, and members who did not have any commitments in NAP IV, e.g. Audit Service. There was discussion around developing a Terms of Reference that would guide Steering Committee membership. A draft was shared with members but was not finalised by the time the IRM researcher attended the Steering Committee meeting on 12 October 2023. An interviewee in parliament noted that resource constraints also limited stakeholder engagement. They observed that while there were resources from development partners to advance the implementation of specific policy areas, there was inadequate funding for the MSF meetings and consultations.¹⁰⁷

Compliance with the Minimum Requirements

The IRM assesses whether member countries met the minimum requirements under OGP’s Participation and Co-Creation Standards for the purposes of procedural review.¹⁰⁸ During co-creation, Sierra Leone acted according to the OGP process. The two minimum requirements listed below must achieve at least the level of ‘in progress’ for a country to have acted according to OGP process.

Key:

Green= Meets standard

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

Red= No evidence of action

Acted according to OGP process during the implementation period?	
The government maintained an OGP repository that is online, updated at least once during the action plan cycle, and contains evidence of development and implementation of the action plan. ¹⁰⁹	Green
The government provided the public with information on the action plan during the implementation period. ¹¹⁰	Green

⁹³ ‘Open Government Partnership (OGP)’, National Council for Civic Education and Bureacracy (NaCCED), <https://www.nacced.gov.sl/ogp/>.

⁹⁴ ‘Open Government Partnership (OGP)’ NaCCED.

⁹⁵ OGP, *Action Plan Review: Sierra Leone 2021–2023*, https://www.opengovpartnership.org/wp-content/uploads/2023/03/Sierra-Leone_Action-Plan-Review_2021-2023.pdf.

⁹⁶ National Council for Civic Education and Democracy (NaCCED), 'NaCCED bags an award from the Sierra Leone Debating Council. The award is in recognition of the civic role the Council plays in the country!', Facebook, 3 July 2024, <https://web.facebook.com/profile.php?id=100068658423989>.

⁹⁷ NaCCED, *OGP Symposium 2022 Report*, https://www.nacced.gov.sl/wp-content/uploads/2022/10/OGP-National-Symposium-Report_Draft-Kalilu.pdf.

⁹⁸ NaCCED, 'Report on High Level Stakeholders Engagement on the OGP', <https://www.nacced.gov.sl/wp-content/uploads/2022/09/Report-on-High-Level-Stakeholder-engagement-on-OGP.pdf>.

⁹⁹ Courtesy call with Minister and Deputy Minister, Ministry of Information and Civic Education & OGP Secretariat, 11 October 2023.

¹⁰⁰ Shahid Korjie, Coordinator, Justice Sector Coordination Office, Office of the Attorney General and Minister of Justice, Republic of Sierra Leone, interview 11 October 2023; Sierra Leone Parliament staff and ParlCSOnet members, interview 12 October 2023.

¹⁰¹ Electoral Commission for Sierra Leone, interview with Commissioners, Chairman and Staff, interview 16 October 2023.

¹⁰² Sample received from Open Parliament and Open Extractives commitments, https://www.nacced.gov.sl/wp-content/uploads/2023/08/OGP-Milestones_Open-Parliament.pdf.

¹⁰³ Korjie, interview.

¹⁰⁴ Mohamed Baimba Koroma, National Coordinator, Sierra Leone Extractive Industries Transparency Initiatives (SLEITI), interview 12 October 2023.

¹⁰⁵ 'Minutes for OGP SC Meeting', NaCCED, <https://www.nacced.gov.sl/wp-content/uploads/2023/08/Jan-2023-OGP-Minutes.pdf>.

¹⁰⁶ Hannah H. Jimmy, OGP Sierra Leone National Coordinator.

¹⁰⁷ Sierra Leone Parliament staff and ParlCSOnet members, interview 12 October 2023.

¹⁰⁸ Please note that future IRM assessment will focus on compliance with the updated OGP Co-Creation and Participation Standards that came into effect on 1 January 2022: <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

¹⁰⁹ 'Open Government Partnership (OGP)', NaCCED.

¹¹⁰ NaCCED, *OGP Symposium 2022 Report*.

Section IV. Methodology and IRM Indicators

This report supports members' accountability and learning through assessment of (i) the level of completion for commitments' implementation, (ii) early results for commitments with a high level of completion identified as promising or that yielded significant results through implementation, and (iii) participation and co-creation practices throughout the action plan cycle. The IRM commenced the research process after the first year of implementation of the action plan with the development of a research plan, preliminary desk research, and verification of evidence provided in the country's OGP repository.¹¹¹

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.¹¹² The level of completion for all commitments is assessed as one of the following:

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

Early Results

The IRM assesses the level of results achieved from the implementation of commitments that have a clear open government lens, have a high level of completion or show evidence of achieving early results (as defined below). It considers the expected aim of the commitment prior to its implementation, the specific country context in which the commitment was implemented, the specific policy area and the changes reported.

The early results indicator establishes three levels of results:

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

- improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Josephine Njungi and Evans Kibet and was reviewed by Brendan Halloran, IRM external expert. The IRM methodology, quality of IRM products and review process are overseen by the IRM’s International Experts Panel (IEP).¹¹³ This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual¹¹⁴ and in Sierra Leone’s Action Plan Review 2021–2023. For more information, refer to the IRM webpage¹¹⁵ or OGP glossary.¹¹⁶

¹¹¹ ‘Open Government Partnership (OGP)’, National Council for Civic Education and Bureacracy (NaCCED), accessed 5 February 2024: <https://www.nacced.gov.sl/ogp/>.

¹¹² The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses ‘potential for results’ and ‘Early Results’ at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.

¹¹³ ‘International Experts Panel’, OGP, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>.

¹¹⁴ Independent Reporting Mechanism, *IRM Procedures Manual*, V.3, 16 September 2017, <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

¹¹⁵ Open Government Partnership, *IRM Overview*, <https://www.opengovpartnership.org/irm-guidance-overview/>.

¹¹⁶ Open Government Partnership, *OGP Glossary*, <https://www.opengovpartnership.org/glossary/>.

Annex I. Commitment Data¹¹⁷

Commitment 1: Open Parliament

- | | |
|---|---|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Substantial | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Significant Results |
|---|---|

This commitment is assessed in Section II above.

Commitment 2: Access to Justice

- | | |
|--|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate Results |
|--|--|

This commitment sought to ensure that all citizens benefit from a fair, impartial and effective justice sector through enabling increased access to justice and equal opportunities for economic development.¹¹⁸ This commitment is continued from the previous action plan and included in National Action Plan V. While important, this commitment lacked a strong connection to open government as most of the milestones were internal to the government and did not directly contribute to making government more transparent, participatory or accountable to the public.

Shahid Korjie, Coordinator at JSCO,¹¹⁹ noted that there has been some progress in establishing the justice centre with a data aggregation system that promotes interaction between community justice providers and the formal justice system (milestone 1). Preliminary discussions took off with the technical arm of government, Directorate of Science and Technology and Innovation (DSTI).¹²⁰ However, there have been leadership changes within DSTI and for the Attorney General that stalled the discussions. A JSCO report¹²¹ refers to a database being developed to enhance the case management system. It is not clear if this is the same database in milestone 1 or could potentially be linked for deeper analysis.

On the recruitment of 10 local courts personnel (milestone 2), Shahid Korjie stated that there has been recruitment of personnel in the local courts. The IRM researcher did not receive a confirmation on how many these were. There have been efforts to further strengthen the local courts with the Ministry of Justice, attorney general and chief justice going through all local courts across the country for inspection and needs assessment sensitisation to inform a process that seeks to reconstitute them.¹²² The JSCO also supported the judiciary in strengthening the local courts through a grant from OSIWA. This grant covered the development of a training manual and training of local courts officials. A consultant was recruited to develop the training manual and curriculum.¹²³ This training manual was validated.¹²⁴ Recruitment and deployment of 30 state counsels (milestone 4) is an ongoing process coordinated by the Office of the Attorney General and Ministry of Justice. Applications were received and several were deployed to provinces.¹²⁵ Little evidence is accessible, given the closed nature of the recruitment of judiciary officers in Sierra Leone.

The finalization and rollout of the Diversion Framework for Children through public engagement in all police stations nationwide was completed, with support from UNICEF (milestone 3). The framework¹²⁶ was developed collaboratively with stakeholders in the Child Justice Working Group (judges, magistrates, religious institutions, police and civil society) with public engagement to standardize the approach of dealing with children who come into contact with the law. The framework is in place and has been piloted with 50 police stations countrywide and trained 120 child justice actors and policy tested in 10 selected police stations with the formation of the Diversion Committee Members in the piloted police stations to oversee the implementation of the process.^{127,128} There is ongoing sensitisation on the framework, plans to table the framework at Cabinet for review and approval, and to mainstream the programme in the public budget as a main workstream of the institution.¹²⁹ JSCO, as chair of the Child Justice Working Group, is using lessons learnt in the process to improve the effectiveness of implementation.

JSCO focused on training of paralegals (milestone 5). A comprehensive curriculum and training manual for paralegals was developed with consultations from key stakeholders. This included digitized teaching materials for tutors and students. The curriculum has been validated, and training for a one-year certificate course for paralegals was underway in 2022 at the Justice and Legal Training Institute.¹³⁰ Shahid Korjie further shared that the training was undertaken in four sets involving relevant institutions such as the Legal Aids Board, which is responsible for state paralegals.¹³¹

Commitment 3: Open Elections

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: Moderate Results |
|--|--|

This commitment aimed to contribute towards an independent and professional election management body; free, fair, transparent and nonviolent elections accepted by all; and an election process that earns public trust.¹³²

While not initially identified as activities under this commitment, the Government of Sierra Leone implemented various legal reforms in anticipation of the June 2023 general elections. Laws passed in 2022 included the Public Elections Act,¹³³ Political Parties Act and Gender Equality and Women’s Empowerment. These reforms confirmed the mandate and authority of election management bodies.

The Electoral Commission published a voter register prior to the election, but not six months before as intended (milestones 1 and 2). A provisional voters register was produced in December 2022 and exhibited nationwide. Voters could confirm their details and provide corrections. The final register was shared as hard copies in 3,630 registration centres, shared on several online platforms,¹³⁴ and shared as soft copies with political parties and posted on the ECSL website. The number of registered voters per polling centre was published on 25 May 2023,¹³⁵ and an electronic copy of the final voters list – including names and pictures – was provided to political parties on 8 June 2023 and to National Elections Watch two days before the elections.¹³⁶ The

ECSL stated inconsistencies in the law and practice in the voter registration was the reason the final register was published on 25 May 2023.¹³⁷

At the time of writing the report, there was no evidence that integrity trainings were conducted for the electoral management bodies or integrity pledges developed and signed (milestones 3 and 4). However, ECSL reported that an Ethics Unit was created,¹³⁸ and an Ethics Code of Conduct was developed by the Unit.¹³⁹

The ECSL, with financial support from ECOWAS and in partnership with 27 CSOs, media and mobile service providers, rolled out the voter education strategy¹⁴⁰ (milestone 6). These included traditional methods like the use of town criers, through the Ward Electoral Education Committees, face-to-face education and in-town meetings.¹⁴¹ Other methods included print, electronic and social media.¹⁴² Voter education faced challenges around misinformation and disinformation. ECSL noted that political parties could support efforts of raising awareness on the electoral process and ECSL’s mandate.¹⁴³

ECSL sought to establish an effective ICT infrastructure to support election results management. ECSL established national and regional tally centres (milestone 5).¹⁴⁴ Results were processed at the regional centres and then submitted to the district headquarters for consolidation. ECSL noted that results management were fully compliant with the law.¹⁴⁵ Despite efforts, domestic and international observers expressed concerns with the tabulation and transmission of results.¹⁴⁶

There was consensus from domestic,¹⁴⁷ international¹⁴⁸ and African Union election observers that the election process before and during the elections was generally peaceful, transparent and credible up to the point of counting on polling day. Nevertheless, a lack of transparency in the tallying and transmission of election results and completeness of data to the level of polling station undermined public trust in the election outcome.¹⁴⁹ Therefore, this commitment fell short of its ambitious aims for transparent elections accepted by all and an election process that earns public trust.

Commitment 4: Open Extractives/BO & Systematic Disclosure of Extractives Data

<ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial 	<ul style="list-style-type: none"> • Completion: Substantial • Early results: Significant Results
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This commitment is assessed in Section II above.

¹¹⁷ Editorial notes:

1. For commitments that are clustered: The assessment of potential for results and ‘Early Results’ is conducted at the cluster level, rather than the individual commitment level.
2. Commitments’ short titles may have been edited for brevity. For the complete text of commitments, please see Sierra Leone’s action plan: https://www.opengovpartnership.org/wp-content/uploads/2022/03/Sierra-Leone_Action-Plan_2021-2023.pdf.

3. For more information on the assessment of the commitments' design, see Sierra Leone Action Plan Review: https://www.opengovpartnership.org/wp-content/uploads/2023/03/Sierra-Leone_Action-Plan-Review_2021-2023.pdf.

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