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Action Plan Review: Ghana 2023–2027

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Section I: Overview of Ghana 2023–2027 Action Plan

Ghana's first four-year action plan prioritizes institutionalizing open government through the passage of laws and regulations. Commitments to further open parliament and combat mis- and disinformation show substantial potential for results. Ghana can continue leveraging its robust open government community by strengthening government-civil society coalitions around priority aims. Reformers can plan for continuity through the December 2024 national elections and the opportunity to refresh the action plan midway through the implementation period.

The fifth action plan contains 15 commitments. Twelve address policy areas carried forward and updated from previous action plans. New policy areas include accountability in the health sector, fisheries transparency, and combating mis- and disinformation. Notably, 10 of the 15 commitments are centered on the passage or amendment of laws or regulations.[1] Ghana submitted two commitments to the Open Gov Challenge.[2] Commitment 11 to pass the Affirmative Action Bill and commitment 13 to combat mis- and disinformation.

This review focuses on two commitments that have substantial potential for results. Commitment 13 was designed and will be collaboratively implemented by government and civil society. Reformers aim to collectively identify problems and solutions to mis- and disinformation in Ghana, while also protecting freedom of speech. This includes conducting a human rights assessment to inform future legislative changes. Information integrity was identified as a priority in the lead up to the December 2024 elections.

Commitment 15 seeks to promote parliamentary openness by operationalizing an Open Parliament Steering Committee and Citizens Bureau. These bodies aim to strengthen civil society and parliamentary engagement and oversee open parliament reforms. The commitment builds on recent momentum, evidenced by the creation of an OGP Parliamentary Caucus.[3] This commitment has the potential to significantly boost implementation of the national action plan, as the majority of commitments call for legislative action.

An inclusive and detailed co-creation process resulted in an action plan representing participants' consensus. Led by the Steering Committee, reformers created platforms both in-person and

AT A GLANCE
Participating since 2011
Number of commitments: 15
Overview of commitments:
Commitments with an open government lens: 13 (87%)
Commitments with substantial potential for results: 2 (13%)
Promising commitments: 2
Policy areas:
Carried over from previous action plans:
• Anti-corruption and integrity
• Audit report implementation
• Citizen complaints mechanism
• Energy sector transparency
• Right to information
• Women's political participation
• Open local government
• Open parliament
Emerging in this action plan:
• Health accountability
• Fisheries transparency
• Combating mis- and disinformation
Compliance with OGP minimum requirements for co-creation: Yes

virtual collection of input and validation of commitments. CSOs and non-state actors leveraged their networks to mobilize participation and enhance awareness of the OGP processes.[4] There is opportunity for Ghana to continue expanding its open government community by bringing in new civil society organizations and branches of government. Ghanaian reformers can consider a national open government strategy, which could set Ghana's long-term vision for open government and harmonize reforms across levels and branches of government. Ghana has seven members in the OGP Local Program.[5] The Steering Committee can also consider opportunities to expand and coordinate open government at the local level, similar to Morocco's local open government network.[6]

As a four-year action plan, Ghana will have the opportunity to reflect on progress and refresh at the two-year mark into the implementation period.[7] The IRM will review any commitments added or significantly amended in the refreshed action plan. As most commitments in this action plan call for legislative action, reformers can use the midpoint refresh to update the commitment to include steps towards implementing those laws once passed. For commitments where legislation is stalled, reformers can use the refresh to strategize around opportunities and remove obstacles hindering the legislative action.

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[1] "Ghana 2023–2027 National Action Plan," Republic of Ghana, January 2024, https://www.opengovpartnership.org/wp-content/uploads/2024/01/Ghana_Action-Plan_2024-2028_December.pdf.

[2] "Open Gov Challenge," Open Government Partnership, https://www.opengovpartnership.org/the-open-gov-challenge.

[3] "Ghana's parliament inaugurates Open Government Partnership Caucus," Happy Ghana Media, 28 November 2023, https://www.happyghana.com/ghanas-parliament-inaugurates-open-government-partnership-caucus.

[4] "Consultation reports: Roadmap for development of the fifth action plan," OGP Ghana Secretariat, https://drive.google.com/drive/folders/1kzcbjjX7n6PIkdFgCEVGyzIpaezgZlIX.

[5] OGP Local members from Ghana include: Anloga, Ketu South, Sekondi-Takoradi, Shama, Tamale, and Wassa Amenfi East. See: "OGP Local," Open Government Partnership, https://www.opengovpartnership.org/ogp-local.

[6] "Moroccan Network of Open Territorial Collectives," Directorate General of Territorial Communities, https://collectivites-territoriales.gov.ma/fr/remacto.

[7] See '2.3 Four-Years Rules Refresh' in: "OGP National Handbook," Open Government Partnership, 2024, https://drive.google.com/drive/folders/1kzcbjjX7n6PIkdFgCEVGyzIpaezgZlIX.

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Section II: Promising Commitments

The following review looks at the two commitments that the IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results.

This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan. Specifically, it highlights why the remaining 13 commitments are not considered promising and shares commitment design recommendations on how they could reflect ambitious open government results.

Promising Commitments

Commitments 13 and 15 have been identified as the most promising for yielding significant open government results. These commitments outline clear activities that address critical policy areas and, if fully implemented, could potentially lead to major changes in practice, policy, and institutions for advancing open government.

Table 1. Promising commitments

Commitment 13: Combatting misinformation and disinformation promises to take a multistakeholder approach to conduct a human rights assessment of existing legislation and framework for public education, media literacy, and fact checking.
Commitment 15: Parliamentary oversight and openness promises to strengthen civil society engagement with parliament and advance open parliament reforms by operationalizing a Citizens Bureau and Open Parliament Steering Committee.

Commitment 13: Combatting Misinformation and Disinformation [Ministry of Information]

For a complete description of the commitment, see Commitment 5.4.1 in: https://www.opengovpartnership.org/documents/ghana-action-plan-2024-2028-december.

Context and objectives

Ghana's commitment to tackle mis- and disinformation while protecting freedom of expression is a new area of reform for Ghana's open government community. It originated from a list of priorities identified at a 2023 digital governance workshop attended by government and civil society in Accra.[1] The aim of combatting mis- and disinformation on digital platforms, while also ensuring the legal framework protects freedom of expression, will be achieved through the collaborative development and operationalization of a Framework on Media Literacy, Public Education, and Fact Checking as well as a human rights assessment on existing legislation to ensure freedom of speech protections.[2]

An informed public is a cornerstone of electoral democracy and civic participation. While traditional media continues to play a significant role, digital media has become an essential campaign tool due to its ability to reach a larger audience. In 2023, radio was still a primary

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source of news for Ghanaians. But as internet and social media users in Ghana has grown to 24.06 million and 7.40 million respectively (21.5% of the population),[3] four of ten Ghanaians now get their news from social media or the internet.[4] The rise of digital media, combined with advancements of artificial intelligence, has introduced new challenges to global information integrity. These challenges include deepfake, disinformation, technology-facilitated violence against electoral candidates, and micro-targeting of voters through data exploitation.[5]

Ghana benefits from freedom of expression and a vibrant media. However, political competition has led to biased reporting and violence against journalists.[6] Political associations act as a key driver for Ghana's fake news ecosystem, as one-third of media outlets are owned by political parties or affiliates.[7] An Afrobarometer survey found that a vast majority of Ghanaians support the media taking a watchdog role by holding the government to account. However, many citizens are skeptical of private or government news sources.[8] Ghanaian leaders, civil society organizations (CSOs), and media have denounced fake news, inflammatory rhetoric, and hate speech for eroding democratic gains and disrupting peace and security. They have also called upon government to respect and uphold the constitutional freedom of opinion and expression, including media freedom.[9] In light of Ghana's general elections in December 2024, addressing mis- and disinformation was identified as a key concern.[10]

Potential for results: Substantial

The commitment's potential for results lies in the collaboration of government and CSOs, including media to work toward a consensus on what constitutes mis- and disinformation—subsequently undertaking public education while protecting the right to freedom of expression.[11] Government implementers include the Ministry of Information, Ministry of Communications and Digitalization, National Media Commission, Commission on Human Rights and Administrative Justice, National Commission on Civic Education, and Information Services Division. Civil society partners include the Media Foundation for West Africa, PenPlusBytes, and Odikro.[12]

The proposed Framework on Media Literacy, Public Education, and Fact Checking will establish an understanding and criteria by government, CSOs, and media on what constitutes mis- and disinformation and what constitutes freedom of expression. Applying this framework to support media literacy, public education, and fact checking will advance meaningful engagement by ensuring that citizens have truthful information and can express themselves freely as per their constitutional right.[13] An effective framework could focus on literacy in relation to different forms of media, including radio, social media, and internet platforms, as well as on how to identify partisan sources.

According to a civil society representative, the framework will include a tracker to enable commitment actors to monitor online platforms for mis- and disinformation. This will be achieved through automated systems and media monitors comprising journalists, CSOs, and government officials.[14] The tracker can facilitate continued collaboration between CSOs and government actors. The planned media literacy and public education element, targeting both government and non-government actors, will be instrumental in pre-bunking information—teaching critical thinking skills and how to identify mis- and disinformation to the public,[15] thus tackling mis- and disinformation at the earliest stages.[16]

The commitment further provides for a structured approach to initiating legislative reform. The joint development of a human rights assessment by government and civil society will help identify changes and amendments to existing legislation that ensures the protection of free speech. The

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action plan specifically mentions strengthening the provisions of the 2008 Electronic Communications Act and 1960 Criminal Offences Act to prevent mis- and disinformation, which Ghanian CSOs have called to be repealed as they limit press freedom.[17]

Opportunities, challenges, and recommendations during implementation

Notably, this commitment represents a shift in Ghana from discussing the challenges of mis- and disinformation to multistakeholder action. The collaborative approach between government, civil society, and the media in the design and implementation of this commitment is a core strength. This commitment creates the space for government and civil society to reach a common definition of the problem and possible solutions. This is particularly vital in the lead up to the December 2024 general elections. Implementers are encouraged to prioritize activities that can facilitate access to trustworthy and accurate election information. Significant potential also lies in the opportunity to act upon the framework and human rights assessment.

To raise this commitment's ambition, reformers can aim to complete the assessment by the midpoint refresh, after which implementers can collaboratively identify actions to implement recommendations raised by the assessment. The next two years could then prioritize implementing the recommendations to protect freedom of speech while combatting mis- and disinformation. Reformers are also encouraged to continue to broaden participation from civil society and media in the consultation process.

Commitment 15: Parliamentary Oversight and Openness [The Parliament of Ghana]

For a complete description of the commitment, see Commitment 5.5 in: https://www.opengovpartnership.org/documents/ghana-action-plan-2024-2028-december.

Context and objectives

Ghana has pursued open parliament reforms in previous action plans, with active engagement from parliamentary representatives on the national OGP Steering Committee. However, open parliament efforts have only recently begun to benefit from formalized processes and structures. Ghana scored first among the African parliaments evaluated in the 2020 Open Parliament Index.[18] Yet, there remain opportunities to strengthen parliamentary transparency, avenues for civil society engagement, and advancement of open government legislation. In the lead up to Ghana's fifth action plan, the parliament established an OGP Caucus, a Citizens Bureau, and drafted Ghana's first open parliament plan. This commitment continues and expands these efforts, including building the capacity of caucus members, creating an OGP Parliamentary Steering Committee, and improving parliament's compliance with the Right to Information Act.

Potential for results: Substantial

This commitment has a substantial potential to strengthen the parliament's role in advancing national open government reforms as well as increasing parliamentary transparency itself. It promises to ensure new open parliament structures lead to open government results, whose potential is underpinned by the support of a coalition of open government reformers in parliament, government, and civil society.

Notably, Ghana inaugurated an OGP Parliamentary Caucus in 2023.[19] The caucus aims to advance national OGP commitments by driving forward legislation to make government more transparent, accountable, and participatory.[20] This includes fast tracking approval of laws, advocating for budgetary prioritization and allocation, and oversight of the overall action plan. The caucus includes 10 members drawn from both the ruling and opposition parties. Two members also serve on Ghana's national OGP Steering Committee. This commitment aims to build the capacity for all caucus members on open government and develop a shared vision for supporting OGP processes in Parliament. The lengthy process to pass or amend legislation has stalled some of Ghana's previous ambitious open government reforms.[21] In this action plan, 10 out of 15 commitments call for the amendment or passage of a law or regulation. A lobbying body dedicated to advancing legislation in parliament promises to help advance Ghana's open government objectives.

This commitment aims to also establish an Open Parliament Steering Committee with government and civil society members. The committee will be responsible for strengthening citizen engagement with the parliament as well as monitoring the implementation of open parliament action plan. Along with the OGP Caucus, this committee provides a much needed avenue for effective monitoring and tracking of action plan implementation.[22]

In 2023, the parliament launched a Citizens Bureau to facilitate civil society and public engagement with parliament in the development and implementation of open parliament plans.[23] However, Ghana's first open parliament plan had been drafted but not finalized and submitted to OGP at the time of writing, and the IRM could not confirm whether reformers intend to finalize and implement the plan under this commitment. As of 2024, the bureau requires office space, staffing, and budgetary allocation to facilitate its functions, as intended under this action plan. Fully operationalizing the bureau will be instrumental in enabling the office to perform its duties, including creating platforms and channels for disseminating information and enabling two-way information sharing between parliament and CSOs.

Finally, the commitment seeks to ensure that the parliament complies with the requirements of Ghana's 2019 Right to Information Act (Act 989). According to a representative of the Citizen's Bureau, the parliament has an information officer who submits the annual reports to the Right to Information Commission (RTIC).[24] Consequently, the parliament has been listed as a compliant institution in the RTIC's 2022 Annual report. However, the parliament has neither developed nor published the information manual as prescribed in Section 3 of the RTI Act, which they intend to develop during this action plan implementation period. As prescribed by law, the manual is expected to detail the type of information generated by or under the custody of the parliament, the arrangements, procedure and costs of accessing information (where applicable), and relevant contact details. A parliamentary monitoring organization representative noted that this would help the parliament to be more accountable for information, thus enhancing transparency.[25]

Opportunities, challenges, and recommendations during implementation

A diversion of attention and resources prior to Ghana's 2024 December elections could pose a challenge to implementing this commitment. To mitigate, implementers could develop a transition plan to ensure continuity through the elections period. Expedited operationalization of the Citizens Bureau and OGP Parliamentary Steering Committee could also be prioritized as they could ensure continuity during the transition phase and facilitate the swift onboarding of newly elected legislators into the activities.

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To strengthen oversight, the steering committee and the OGP Caucus could jointly develop and communicate a framework for regular check-ins and monitoring of action plan implementation. This framework could become a standing agenda item in the caucus and committee meetings to ensure consistent reporting and accountability. Likewise, reformers could develop a legislative strategy for priority open government legislation underpinning the national action plan. This strategy could consider how to leverage the caucus and steering committee, civil society community, and government bodies to collectively advance legislative priorities. It could also articulate public participation mechanisms in the development of laws and regulations.

For comparison, Sierra Leone's experience of pursuing open parliament reforms through an election season provides an opportunity for peer learning. Like Ghana, the Parliament of Sierra Leone established a CSO desk to facilitate civil society engagement with parliament, overseen by a joint parliament and CSO network. Altogether, these bodies have facilitated civil society-parliament dialogue and advanced open government legislation in parliament.[26]

Other Commitments

New Reform Areas

Ghana's action plan includes a new reform area under Commitment 9 to pass a new Fisheries Act or amend the existing one for greater transparency in the fisheries sector. On 9 July 2024, the Minister of Fisheries and Aquaculture Development submitted an official commitment letter to join the Fisheries Transparency Initiative (FiTI). Commitment 9 and the letter both highlight the government's aim to work with non-government partners to amend legislation to enable public access to fisheries data.[27] IRM analysis of Commitment 9's potential for results is limited by a lack of information on the intended scope and content of legal changes and their potential impact on fisheries transparency. However, this commitment could prove to have significant results should membership in FiTI and subsequent legal amendments translate to greater transparency, accountability, and participation in the sector.

Commitment 7's aim of increasing the transparency of power purchase agreements (PPAs) also presents a new area for reform in this action plan. While Ghana currently maintains a PPA register,[28] the commitment seeks to amend legislation to mandate open contracting and disclosure of government agreements on the purchase and sale of electricity. This commitment could prove to have notable results if legal changes result in greater transparency of PPAs. Engaging civil society and other non-government partners in drafting legislative amendments can help to ensure that they better enable the public to hold decision makers accountable.

Commitment 6 aims to address challenges with funding for health facilities and establishing a mechanism for citizen feedback on health services. Positively, the commitment foresees the development and dissemination of digital platforms to facilitate complaints and feedback on health services. The midpoint refresh presents an opportunity for reformers to discuss and update the commitment to include activities that ensure the government receives, considers, and acts on input provided through the platform.

Commitments prioritizing legislative action

The action plan continues several commitments that aim to pass long-sought legislation and regulations to advance anti-corruption, government integrity, and inclusion efforts. These include

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Commitment 1 on passing the Conduct of Officers Bill and regulations to strengthen asset declaration, Commitment 2 on passing regulations to operationalize the Witness Protection Act, Commitment 4 on regulations for the Companies Act 2019 to strengthen beneficial ownership disclosure, Commitment 11 to pass the Affirmative Action Bill, and Commitment 12 to pass the Persons with Disability Re-enactment Bill. While these commitments have faced challenges in previous action plans,[29] the four-year implementation period offers a longer timeframe to undertake legislative actions and an opportunity to reflect and refresh at the two-year mark. At the time of writing, the parliament had already passed the Affirmative Action Act in July 2024, pending the president's signature before it becomes law. Commitment 11 in particular could have significant results if reformers use the implementation period to begin operationalizing this Act to ensure gender equality in the public and private sectors.[30]

Strengthening ambition levels

Commitment 8 continues efforts to institutionalize the right to information, in particular by passing regulations to operationalize the Right to Information Law. Reformers are encouraged to continue the positive momentum and undertake ambitious reforms proportional to the action plan's four-year timeline. For instance, consultations could focus on ensuring that the regulations address public priorities in RTI, such as improving turn-around time for compliance, both with the respective public institutions, as well as petitions made to the commission or the courts of law.

Commitment 4 continues Ghana's efforts to implementing the Anti-Money Laundering Act, including expanding transparency of companies' beneficial owners. This iteration of the commitment aims to develop regulations for the Companies Act 2019, with provisions for BO transparency. Positively, Ghana launched a beneficial ownership register under the previous action plan that is available to relevant authorities. The public can request specific information for a small fee. As written, the commitment milestones are positive, but it is unclear whether they will result in greater beneficial ownership information being made available to the public. Implementers are encouraged to use the midpoint refresh moment to identify and articulate activities that will facilitate greater public access to beneficial ownership information.

Carried over from the previous action plan, Commitment 3 aims to provide resources and training for audit committees. Given the four-year timeline, the IRM recommends that the Internal Audit Agency, Public Accounts Committee (PAC), and civil society partners raise the ambition beyond these positive—but modest—milestones. Reformers could strengthen the commitment to build a coalition to uphold the integrity and impact of the audit process. Strengthening collaboration between civil society and government reformers could help to sustain momentum and ensure audit laws and processes are upheld. Ghana's OGP champions could prioritize activities that support the PAC in expediting the turnaround of audit recommendations for subsequent action by the audit committees. These could include capacity building of the PAC members and development of toolkits for audit report review and follow up of recommendations.

Commitments 5 and 10 seek to strengthen the ability of the Commission on Human Rights and Administrative Justice (CHRAJ) to process citizen feedback on public service delivery and address complaints in its role as the ombudsman. However, CHRAJ did not respond to the IRM's request for further information on these commitments.[31] As such, the IRM was unable to clarify the relationship between the two reforms and further details on the intended efforts. The commitments could lead to notable results should it strengthen channels for citizens to submit comments and complaints that the government acts on to improve services.

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Commitment 14 aims to strengthen data sharing and interoperability among government entities engaged in public service delivery. It seeks to improve data-driven decisions and public service provision. However, it is not evident how implementation would increase public access to data or information. Implementers can amend this commitment at the midpoint to add or clarify activities that would directly open government to citizens.

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[10] "Penplusbytes and NCCE Partner to Fight Election Disinformation Ahead of Ghana's December Polls," PenPlusBytes, 9 July 2024, https://penplusbytes.org/penplusbytes-and-ncce-partner-to-fight-election-disinformation-ahead-of-ghanas-december-polls.

[11] Delali A. Gawu and Richard Obeng Mensah, "Balancing the Freedom of Expression, Right to Information, and Use of Social Media in Ghana," Palgrave Communications, 11 December 2022, https://ssrn.com/abstract=4300129; Jerry Sams, (Executive Director of PenPlusBytes), interview by IRM Researcher, 8 July 2024.

[12] "Ghana 2023–2027 National Action Plan," Government of Ghana.

[13] Musa Issa (Head of Regulatory at Ghana National Information Technology Agency), interview by IRM Researcher, 2 July 2024.

[14] Sams, interview.

[15] "'Pre-bunking' shows promise in fight against misinformation," Associated Press, 24 August 2022, https://apnews.com/article/technology-misinformation-eastern-europe-902f436e3a6507e8b2a223e09a22e969.

[16] Sams, interview.

[17] See Freedom of Expression and Belief in: "Freedom in the World 2024: Ghana," Freedom House, 2024, https://freedomhouse.org/country/ghana/freedom-world/2024.

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[22] Benjamin Arye (Programs Officer at Parliamentary Network Africa), interview by IRM Researcher, 25 June 2024.

[23] "Citizens' Bureau," Parliament of Ghana, https://www.parliament.gh/cb.

[24] Prosper Hoetu (Senior Research Officer at Parliament of Ghana's Citizen Bureau), interview by IRM Researcher, 28 May 2024.

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[25] Arye, interview.
[26] "IRM Results Report: Sierra Leone 2021–2023," Open Government Partnership, 2024, https://www.opengovpartnership.org/documents/sierra-leone-results-report-2021-2023.
[27] Godfred Ameyaw Asiedu, "Ghana Joins FiTI!" Fisheries Transparency Initiative, 9 July 2024, https://fiti.global/ghana-joins-fiti.
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[29] "IRM Results Report: Sierra Leone 2021–2023," Open Government Partnership.
[30] "Affirmative Action Act 2024 Passed by Parliament," Ministry of Information, 8 August 2024, https://moi.gov.gh/newsroom/2024/08/affirmative-action-act-2024-gender-equity-passed-by-parliament.
[31] The IRM requested CHRAJ to share evidence and information but did not receive them.

Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

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

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM follows a filtering and clustering process to identify promising reforms or commitments:

Step 1: Determine what is reviewable based on the verifiability of the commitment as written in the action plan.
Step 2: Determine if the commitment has an open government lens. Is it relevant to OGP values?
Step 3: Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.

Step 4: Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.

- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

III. Potential for results

The IRM adjusted this indicator—formerly known as the "potential impact" indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across

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government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.

● **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by the IRM in collaboration with Ruth Kendagor and was externally expert reviewed by Andy McDevitt. The IRM methodology, product quality, and review process are overseen by IRM's IEP. For more information, see the IRM Overview section of the OGP website.[1]

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[1] "IRM Overview," Open Government Partnership, https://www.opengovpartnership.org/irm-guidance-overview.

Annex 1. Commitment Data[1]

Commitment 1: Verifying Asset Declarations
- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 2: Improving Witness Protection
- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 3: Improving Audit Report Implementation
- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Modest

Commitment 4: Implementing Anti-Money Laundering Act
- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 5: Enabling CHRAJ's Administrative Justice Mandate
- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

Commitment 6: Facilitating Feedback on Health Services
- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 7: Transparency of Power Purchase Agreements
- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 8: Operationalizing the Right to Information Act
- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 9: Transparency of the Fisheries Sector
- Verifiable: Yes

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• Does it have an open government lens? Yes
• Potential for results: Modest

Commitment 10: Establish Citizens Complaint Centre
• Verifiable: Yes
• Does it have an open government lens? Yes
• Potential for results: Modest

Commitment 11: Improving Women's Political Participation
• Verifiable: Yes
• Does it have an open government lens? Yes
• Potential for results: Modest

Commitment 12: Citizen Participation in Local Government
• Verifiable: Yes
• Does it have an open government lens? Yes
• Potential for results: Modest

Commitment 13: Combatting Misinformation and Disinformation
• Verifiable: Yes
• Does it have an open government lens? Yes
• Potential for results: Substantial

Commitment 14: Data Sharing and Intermediation of Public Service Delivery Reforms
• Verifiable: Yes
• Does it have an open government lens? No
• Potential for results: Unclear

Commitment 15: Parliamentary Oversight and Openness
• Verifiable: Yes
• Does it have an open government lens? Yes
• Potential for results: Substantial

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[1] **Editorial notes:**
  1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than individual commitments.
  2. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see Ghana's action plan in: https://www.opengovpartnership.org/wp-content/uploads/2024/01/Ghana_Action-Plan_2024-2028_December.pdf.

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Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the OGP Participation and Co-Creation Standards that came into force on 1 January 2022.[1] The IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. Action plans co-created and submitted by 31 December 2023 fall within the grace period. The IRM will assess countries' alignment with the standards and their minimum requirements.[2] However, countries will only be found to be acting contrary to process if they do not meet the minimum requirements for action plans co-created in 2024 and onwards.

Please note that, according to the OGP National Handbook, countries implementing four-year action plans must undertake a refresh process at the two-year mark. Countries are expected to meet minimum requirements 3.1 and 4.1 during the refresh process.[3]

Table 2. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation?
1.1 Space for dialogue: Ghana's OGP Steering Committee is comprised of 20 members representing the government, civil society, and parliament. It is co-chaired by the senior presidential advisor and a civil society representative. Working groups are formed around thematic areas, raising OGP awareness, and resource mobilization. The steering committee met and convened wider stakeholder consultations between August and December 2023 to develop the fifth action plan. A document describing the Ghana's OGP governance structure is available on Ghana's OGP website and repository.[4]	Yes	*To be assessed in the Results Report*
2.1 OGP website: The Public Sector Reform Secretariat (PSRS) hosts Ghana's OGP website. The fifth action plan was not available on the website at the time of assessment, which the PSRS noted was due to ongoing system updates. In the interim, the documents were provided on the OGP repository.[5]	Yes	*To be assessed in the Results Report*
2.2 Repository: A public Google drive repository is available[6] and was circulated through email and fliers. It contains recent documentation of the fourth action plan implementation and the fifth action plan development.[7]	Yes	*To be assessed in the Results Report*
3.1 Advanced notice: The co-creation roadmap was developed by the steering committee and published sufficiently in advance on the website of the special minister's office,[8] Ghana OGP website,[9] and the Google drive.[10] The roadmap outlines key opportunities for engagement with proposed dates.	Yes	*To be assessed in the Midterm Review*
3.2 Outreach: In addition to circulating a co-creation timeline and concept notes on opportunities to participate, OGP	Yes	Not applicable

stakeholders used social media and WhatsApp groups to invite participation in the co-creation process.[11]		
3.3 Feedback mechanism: A series of virtual and in-person consultations were held to co-create the action plan. The first workshop was held virtually on 24 August 2023 to present the co-creation roadmap and invite input from outside of the steering committee. A two-day in-person co-creation workshop was then held on 25 and 26 October with facilitation by OGP staff. Two virtual workshops were held in November to consult the southern and northern regions respectively. The action plan was then presented and validated at a national multistakeholder meeting on 13 December 2023.[12]	Yes	Not applicable
4.1 Reasoned response: The consultative forums provided reasoned response in that government and civil society jointly discussed and agreed on changes in each thematic area. The final draft was subjected to and adopted in the validation workshop held in December 2023.[13]	Yes	*To be assessed in the Midterm Review*
5.1 Open implementation: The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.	Not applicable	*To be assessed in the Results Report*

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[1] "OGP Participation and Co-Creation Standards," Open Government Partnership, 2021, https://www.opengovpartnership.org/ogp-participation-co-creation-standards.
[2] "IRM Guidelines for the Assessment of Minimum Requirements," Open Government Partnership, https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements.
[3] See Section 2.3 in: "OGP National Handbook," Open Government Partnership, 2022, https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2022.
[4] "Roadmap for the development of the 5th Action Plan," Republic of Ghana, 29 August 2023, https://www.psrs.gov.gh/index.php/document-downloads/26-development-of-5th-national-action-plan; https://osm.gov.gh/index.php/document-downloads/26-development-of-5th-national-action-plan?download=30:development-of-5th-national-action-plan#.
[5] See: https://www.psrs.gov.gh/index.php/home-single.
[6] See: https://drive.google.com/drive/folders/1kzcbjjX7n6PIkdFgCEVGyzIpaezgZlIX.
[7] See: https://drive.google.com/drive/folders/10tT-48yBCoT_X49bdPmtx2faERuzq998.
[8] "Roadmap for the Development of the 5th Action Plan," Republic of Ghana.
[9] "Roadmap for the Development of the 5th Action Plan," Republic of Ghana.
[10] See: https://drive.google.com/drive/folders/10tT-48yBCoT_X49bdPmtx2faERuzq998.
[11] BudgIT Ghana, "Review of 4th OGP National Action Plan," X, 9 November 2023, https://x.com/BudgITgh/status/1722574351956873255; Parliamentary Network Africa, "Concept Note on the OGP Ghana Forum," X, 7 November 2023, https://x.com/PNAfricawatch/status/1721595394340044918.
[12] Evidence of correspondences, invitations, concept note, and attendance register available on OGP Ghana Google Drive. See: https://docs.google.com/document/d/1XsNPnLysYYvo2yIeAojFaDgxUmhCmkG1/edit; https://docs.google.com/document/d/1arYjrVP2IMFnIorjKdv9SQsty3iUaNLH/edi.
[13] See: https://docs.google.com/document/d/1XsNPnLysYYvo2yIeAojFaDgxUmhCmkG1/edit; https://docs.google.com/document/d/1arYjrVP2IMFnIorjKdv9SQsty3iUaNLH/edit.

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