

# **Independent Reporting Mechanism**

Action Plan Review:  
Sierra Leone 2024–2028

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

# Table of Contents

Section I. Overview of the 2024-2028 Action Plan	2
Section II. Promising Commitments in Sierra Leone 2024-2028 Action Plan	4
Section III. Methodology and IRM Indicators	12
Annex 1. Commitment by Commitment Data	17
Annex 2. Action Plan Co-Creation	18

## Section I: Overview

**Sierra Leone’s fifth national action plan aligns with the government’s five-point agenda. It continues to take on ambitious reforms to open parliament, strengthen anti-corruption measures, and enhance legislative frameworks for extractives sector transparency. Despite a short timeframe, the co-creation process brought together government agencies, civil society, and the public to inform an action plan that reflects both government and citizen priorities.**

Sierra Leone’s 2024–2028 Action Plan has six commitments covering anti-corruption and integrity, open parliament, open extractives, access to justice, youth inclusion, and right to information. As Sierra Leone’s first four-year action plan, stakeholders will have an opportunity to refresh the plan at the midpoint of the February 2024–June 2028 implementation period.

This review focuses on three commitments identified to have the greatest potential to open government. Commitment 1 touches on a new reform area in Sierra Leone’s OGP efforts and was identified as a civil society priority. In it, the government and civil society will seek to institutionalize the fight against corruption in government ministries, departments, agencies, and local councils by expanding and operationalizing the Integrity Management Committees.

Under Commitment 2, reformers aim to build on previous open parliament achievements by creating a Legislative Transparency Portal. It will proactively publish legislative information and enable public comments, and aims to continue building civic participation mechanisms by strengthening the Parliament Civil Society Organization Network (ParlCSO) and the joint civil society-parliamentary committee.

This action plan also continues Sierra Leone’s efforts to increase extractives sector transparency by passing the Sierra Leone Extractive Transparency Initiative (SLEITI) Bill under Commitment 3, in line with the Sierra Leone’s 2024–2030 National Development Strategy.<sup>1</sup>

OGP Sierra Leone Steering Committee members reported a stronger co-creation process compared to the last action plan. Even with a tight timeline, this included targeted visits to government agencies, a five-step process to select the final six commitments out of the 254 proposals gathered through consultations, and recurring feedback mechanisms. The process concluded with a stakeholders’ validation meeting on 9 February and public launch in May 2024.

### AT A GLANCE

**Participating since** 2013

**Number of commitments:** 6

#### Overview of commitments:

Commitments with an open government lens: 5 (83%)

Commitments with substantial potential for results: 2 (33%)

Promising commitments: 3

#### Policy areas:

Carried over from previous action plans:

- Open extractives
- Open parliament
- Open justice

Emerging in this action plan:

- Anti-corruption
- Youth inclusion
- Access to information

**Compliance with OGP minimum requirements for co-creation:** No

Commitments 4, 5, and 6 directly align with current government priorities. Commitment 4 continues access to justice reforms incrementally started in previous action plans. Commitment 5 advances implementation of the National Youth Policy but lacks a connection to open government as currently written. Notably, the objective of Commitment 6 is to operationalize the Right to Access Information Commission and legislation. However, the milestones include modest activities that do not support this aim. Reformers can amend Commitments 5 and 6 at during the midpoint refresh to be re-assessed by the IRM.

Stakeholders identified partnership, political goodwill, as well as technical and financial support as key drivers for higher level of implementation of the action plan. They also observed that the four-year period will give government sufficient time to stagger the commitments, check implementation progress, as well as reflect and refine implementation strategies.

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<sup>1</sup> “Medium Term National Development Plan 2024–2030” Government of Sierra Leone, 28 January 2024, [https://www.nepad.org/sites/default/files/2024-07/28.01.24.Abridged%20Version\\_MTNDP2024\\_2030.pdf](https://www.nepad.org/sites/default/files/2024-07/28.01.24.Abridged%20Version_MTNDP2024_2030.pdf).

## Section II: Promising Commitments

The following review looks at the three 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.

**Table 1. Promising commitments**

Promising Commitments
<b>Commitment 1</b> promises to tackle corruption through government and civil society collaboration and strengthening integrity management committees within the government.
<b>Commitment 2</b> aims to continue opening parliament through a legislative portal that will enable the public to access information and comment on draft legislation.
<b>Commitment 3</b> seeks to open access to extractives sector data by passing the Sierra Leone Extractive Industries Transparency Initiative Bill.

### **Commitment 1: Strengthened Domestic Implementation of Anti-Corruption Measures and Compliance**

Anti-Corruption Commission, Transparency International Sierra Leone, Society for Democratic Initiatives, and Centre for Accountability and the Rule of Law.

For a complete description, see Commitment 1 in [Sierra Leone 2024–2028 Action Plan](#).

#### **Context and objectives**

This commitment aims to strengthen the implementation of corruption control measures in all ministries, departments, and agencies (MDAs) as well as local councils in Sierra Leone. The Anti-Corruption Commission (ACC) and civil society organization (CSO) partners will establish and strengthen Integrity Management Committees (IMCs) and review the corruption prevention manual. The commitment aims to enhance reviews to identify corruption risks in the priority areas of agriculture, education, health, infrastructure, public service, and youth. The ACC and Transparency International (TI) Sierra Leone collaboratively developed this commitment, taking into consideration public input on how to combat corruption.<sup>1</sup>

Sierra Leone has sought to combat corruption through legal and policy frameworks since 2000. Most notably, the establishment of ACC in 2000, followed by amendments to the Anti-Corruption Act (ACA), implementation of four Anti-Corruption Strategies, and the creation of an Anti-Corruption Court in 2019. The amended ACA requires IMCs in MDAs. At the time of writing, the ACC was in the process of pulling together its fifth strategy for 2024–2028.<sup>2</sup> Nevertheless, corruption remains a pervasive challenge<sup>3</sup> that not only impedes economic growth and service delivery, but also erodes public trust in government.

#### **Potential for results: Modest**

This commitment has a modest potential to institutionalize anti-corruption controls across government through government and civil society collaboration. Civil society has long advocated for the government to undertake sustained anti-corruption efforts, such as IMCs. Government and civil society stakeholders alike have expressed confidence that IMCs will set a foundation for ongoing collaboration to curb corruption, such as increased rate of audit report implementation.<sup>4</sup>

However, this reform faces implementation challenges and could be better harnessed to open citizens' access to the government.

There is opportunity to strengthen the role IMCs play in opening government to citizens if it leads to greater publication of information. For instance, if the ACC published IMC monitoring reports, CSOs could better monitor its functionality.<sup>5</sup> The commitment could also achieve positive results if IMCs provide channels for civil society or the public to participate in anti-corruption efforts and hold government officials to account.

Civil society will support the ACC, who has formalized their collaboration with CSOs including through signing memorandums of understanding (MOUs), in implementing this commitment. A TI Sierra Leone representative noted that civil society will help to inform the implementation approach by participating in consultations to map and prioritize agencies that will expand the implementation of IMCs. CSOs will continue to advocate for the formation and functionality of IMCs across government as well as to gain support from the Ministry of Finance. As TI Sierra Leone has done in the past, CSOs may also fund and implement some milestones.<sup>6</sup>

The commission also seeks to increase the Systems and Prevention Unit's monitoring of IMC compliance. Considered as miniature ACC in MDAs and local councils, there are currently 82 IMCs, of which 79 are being actively monitored.<sup>7</sup> Among others, these IMCs are expected to propagate values of integrity, develop and implement anti-corruption policies, facilitate integrity trainings, as well as prevent corruption by looking closely at procurement procedures, financial related records, and rules. They are directly supervised by the ACC's National Anti-Corruption Strategy (NACS) Secretariat. Members of the IMCs include the Internal Auditor, Finance Officer, Procurement Officer, and other relevant posts of individual MDAs and local councils.<sup>8</sup> With over 150 MDAs and 25 local councils,<sup>9</sup> Milestones 1 and 3 of the commitment set a target of increasing the number of IMCs by 40%<sup>10</sup> i.e., 32 new IMCs, bringing the total to 114 out of the 175 entities.

While MDAs participated in developing the NACS, weak ownership of IMCs has limited their functionality to date. The Ministry of Youth Affairs, Ministry of Water Resources, and the Petroleum Directorate were not included in the 2019–2023 NACS to establish IMCs due to lack of responsiveness. Where they do exist, IMCs are hindered by a lack of staff and high turnover, contributing to limited records management. Consequently, the ACC often have to re-establish IMCs.<sup>11</sup> Noting unclear budgeting responsibility, TI Sierra Leone underscored that MDAs should allocate budget for IMCs within their respective budget.<sup>12</sup> This will help establish individual entities' sense of ownership of IMCs and contribute to the success of this reform.

Despite these challenges, the ACC<sup>13</sup> and TI Sierra Leone<sup>14</sup> emphasized that the establishment and activation of IMCs remain valuable. The 2022 Afrobarometer survey noted that public perception on the level of corruption in Sierra Leone has improved,<sup>15</sup> largely owing to the functional IMCs. Some MDAs, like the National Revenue Authority, had transformed their IMC into a unit within their institutional structure. In the Kambia District Council, TI Sierra Leone highlighted an example of the CSO Budget Network's monitoring role in producing annual assessments based on audit recommendations. The assessment reported an improvement in local councils' score, highlighting the potential benefits of ongoing monitoring to strengthen the use of resources and government integrity.<sup>16</sup>

Milestone 2 focuses on reviewing the Corruption Prevention Manual by August 2025. The manual is expected to serve as an operational guide for the Corruption and Prevention Department in carrying out risk assessment and other corruption prevention activities in MDAs and local councils. The manual requires a review to address emerging policy issues and

operational and structural gaps within the prevention department. TI Sierra Leone noted that the manual also required a review to align with legal amendments as well as the United Nations Convention Against Corruption (UNCAC). As such, the manual has a critical value for IMCs and other actors in the anti-corruption space.<sup>17</sup>

Under Milestone 4, the ACC aims to enhance system and process reviews in key MDAs to identify and address corruption risks. The prioritization of certain MDAs is due to ACC's limited manpower and resources.<sup>18</sup> These key MDAs cover the “game changer” sectors: (1) Small Holder Commercialization and Agribusiness Development Project (SCADEP); (2) Free Education Project (FEPS); (3) Ministry of Health and its agencies; (4) Sierra Leone Roads Authority; (5) public service with regard to licensing and regulation of liquor, manufacturing, real estate, betting, and gaming houses; and (6) overseas employment schemes for youth.<sup>19</sup>

To do so, the NACS secretariat and the Corruption Prevention Department aim to improve collaboration and develop a common approach to IMCs. They also intend to establish a common assessment framework in benchmarking MDAs and local councils' performance and recognition for good practice in initiating anti-corruption policies and activities. The terms of reference for IMCs have been broadened to incorporate this. At the time of writing, the department was in the process of strengthening regional offices and have incorporated new initiatives in preventing corruption in MDAs. For instance, there now exists a Corruption Risk Assessment as well as Mitigation, Ethics, and Integrity Compliance Scorecard for MDAs and local councils.<sup>20</sup>

### **Opportunities, challenges, and recommendations during implementation**

This commitment benefits from committed reformers in and outside of government. In implementing the commitment, the IRM recommends stakeholders to:

- **Monitor IMC rollout and their operations.** Collect, publish, and analyse IMC monitoring reports and other relevant documents that can help internal and CSO tracking of progress, IMC functionality, and lessons learned to inform future efforts. The ACC can expand its collaboration with CSOs by working with ParICSONet to disseminate findings and progress on IMCs and corruption prevention.
- **Review the 2024–2028 Anti-Corruption Strategy.** This could focus on analysing the central role of IMC in the strategy as well as overall commitment by MDAs and local councils. Drafters can consider activities that build towards a legal framework mandating the institutionalization and funding of IMCs.
- **Incorporate funding for IMCs in MDAs' budget plans.** With limited resources remaining a potential obstacle, the ACC requires an increase in budget allocation to deliver on the NACS.<sup>21</sup> MDAs could include key anti-corruption deliverables in their budgets. In turn, the Ministry of Finance could also reinforce this by including key deliverables around anti-corruption in their budget code circular.<sup>22</sup>

## **Commitment 2: Open Parliament**

Westminster Foundation for Democracy (WFD), OGP Steering Committee, Parliament of Sierra Leone, and Parliament CSO Network (ParlCSOnet).

For complete description see Commitment 2 in [Sierra Leone 2024–2028 Action Plan](#).

### **Context and objectives**

This commitment seeks to strengthen parliamentary transparency and channels for the public to provide input on parliamentary activities. Building on the previous action plan, implementers aim to create an online platform that enhances public access to legislative information and enables the public to provide input. Reformers intend to train CSOs, citizens, and parliamentarians on civic participation in parliament as well as ethics and integrity. Parliament CSO Network (ParlCSOnet) and the public played a central role in developing this commitment, which was then validated with the rest of the action plan by a broader group.<sup>23</sup>

### **Potential for results: Substantial**

This commitment has a substantial potential to strengthen public access to parliamentary information and channels for public engagement in parliamentary processes. It seeks to institutionalize legislation that guides citizen participation and feedback through a portal, guidelines, trainings, and awareness raising.<sup>24</sup>

As of 2022, Sierra Leone was considered the third most open parliament among the thirteen West African countries with an Open Parliament Index score index of 57.97%.<sup>25</sup> The Sierra Leone Parliament mobile app and website<sup>26</sup> provide up-to-date legislative information including bills, debates, voting records, agendas of plenary meeting, reports from parliament among others. However, these platforms only currently allow one-way communication from parliament to the public. A lack of information on parliamentary activities and engagement opportunities have limited citizens' ability to participate. Members of the public can currently engage only through social media or in-person. Resultantly, the majority of the 80 pieces of legislation, treaties, and agreements passed in 2023 were not subject to citizen participation.<sup>27</sup> There are also reported cases where civil society submissions are thrown out for not following the required guidelines.<sup>28</sup>

Positively, under the previous action plan, Sierra Leone institutionalized civil society engagement with parliament through a CSO Desk and a joint committee. ParlCSOnet reported regular discussions and meetings between parliament and civil society throughout implementation. Director of Training and Strategy in the Parliament of Sierra Leone expects this commitment to increase the number and types of citizens, CSOs, and private institutions engaged with parliament. They believe that improving citizen engagement will deepen consultation across legislative agendas<sup>29</sup> and address citizens' disillusionment as they will better understand how to engage as well as strengthen parliament's appreciation of their role to respond to citizens.<sup>30</sup>

Parliament and ParlCSOnet will co-develop and own a Legislative Transparency Portal. The portal will be a one-stop shop that proactively publishes legislative information and enables input.<sup>31</sup> The Westminster Foundation for Democracy (WFD) will provide technical support to develop the portal, while the parliament will provide information in a user friendly and accessible manner. Implementers are considering how to engage the Directors for Legislative, Public Relations, and ICT to achieve this aim.<sup>32</sup> The commitment also includes activities to sensitize the public on parliamentary processes and opportunities to participate.

The Legislative Transparency Portal will include an interface for citizens and CSOs to interact with parliament. Parliament will be able to use the portal to actively seek citizen input on significant legislation. The portal will provide guidelines and templates for civil society and public input on



legislation, to facilitate submissions provided in the right format and timelines.<sup>33</sup> A committee with representatives from the Departments for ICT, Legislative, Public Relations, and Training & Strategy will review, synthesize, and pass information submitted in the portal to the relevant parliamentary committees or leadership.<sup>34</sup>

A step-by-step guide will lay out processes for public participation in parliament. For citizens, it will clarify the guidelines for submitting input and parliament's processes to review and respond. For parliament, the guide will clarify expectations that committees respond to citizens on how their input was acted on to mitigate public disillusionment with parliamentary engagement.<sup>35</sup>

This commitment's potential lies in its aim to enable all Sierra Leoneans to provide input on significant legislation. Evidence of significant results would include active use of the portal by both parliament and the public to shape legislation. This would include evidence that parliament is reviewing and acting on submissions from the public. Beyond the technical tools, reformers can build a culture where both the public and parliament see value and make use of the portal. The IRM has observed in other countries that establishing the technical and financial foundations for a portal's maintenance is key to sustainable reform.<sup>36</sup>

This commitment includes various trainings to strengthen parliamentary and civil society capacities. These include training for civil society, the media, and committee chairpersons in parliament on open budget practices. A CSO partner has supported the development of an engagement framework for parliament in budget hearings. This framework incorporates a push for improved access to budget documents. A WFD representative highlighted that there is opportunity for CSOs to engage in this activity.<sup>37</sup>

Integrity and ethics trainings are also planned for parliamentarians. This milestone was included following interaction with ACC during the co-creation of the action plan. WFD Country Director shared that there is an ethics toolkit that will be useful in equipping parliamentarians. Through this training, parliamentarians will be sensitized on the importance of upholding ethics in their legislative, representation, and oversight mandate. They noted that the Public Accounts Committee (PAC) and new parliamentarians should be prioritized to receive the training.<sup>38</sup> Director of Training and Strategy in the Parliament of Sierra Leone stated that the ACC had identified some good practices that could be highlighted and sustained, and they will be working with parliament and IMCs to deliver the training.<sup>39</sup>

Finally, implementers and the OGP Sierra Leone Steering Committee aim to develop an M&E framework to track implementation of the action plan. The OGP Secretariat and WFD believe that this would be an opportunity to develop, collate, and synthesize data. This information could then be used as a fundraising tool that demonstrates evidence of openness and transparency strides being made in Sierra Leone.<sup>40</sup>

### **Opportunities, challenges, and recommendations during implementation**

Positively, this commitment builds on momentum achieved under previous action plans. The institutionalization of civil society and parliament collaboration in the joint committee and CSO Desk create spaces for coordinated implementation. Regarding potential challenges, Section 75 of the Standing Orders continues to limit citizens' access to information on parliamentary committee discussions. Open parliament reforms in Sierra Leone have benefited from financial and technical support from WFD. The Director of Training and Strategy in the Parliament of Sierra Leone<sup>41</sup> shared that it was time to integrate OGP commitments within the structures of parliament, including institutional budgets, to sustain the commitment. This is possible as OGP and the

commitment to open parliament is aligned with the parliament’s Strategic Plan for 2021–2025.<sup>42</sup> Implementers can consider:

- **Integrating OGP into parliamentary structures** by onboarding other departments, such as ICT, Legislative, and Public Relations. Reformers can identify priority partners to engage at the mid- and endpoints of the action plan.
- **Leverage ParlCSONet to strengthen citizen participation and feedback:** ParlCSONet has enhanced collaboration amongst the parliament, CSO, and citizens. ParlCSONet provides an opportunity to mitigate the barriers caused by Section 75 of the standing orders by enabling participation of civil society in the legislative processes. ParlCSONet can help to increase public awareness and use of the portal, once launched.
- **Strategic media engagement:** The Africa Open Parliament Index Report 2022 notes that there is an opportunity for the parliament to improve media relations. The Director of Training and Strategy in the parliament<sup>43</sup> is considering investing in a press gallery, which would make media a permanent guest and keep citizens informed.
- **Documenting and sharing experiences of interactive online platforms to enhance citizens engagement:** WFD Country Director<sup>44</sup> shared that they were willing to learn from others and share their experience with the wider OGP ecosystem.

### **Commitment 3: Systematic Disclosure of Beneficial Ownership & Extractives Data**

Sierra Leone Extractive Industry Transparency Initiative (SLEITI), National Advocacy Coalition on Extractives (NACE), Network Movement for Justice and Democracy, WoME, Society for Democratic Initiatives, Human Rights Defenders Network Sierra Leone, and WoNES

For complete description see Commitment 3 in [Sierra Leone 2024–2028 Action Plan](#).

#### **Context and objectives**

This commitment seeks to promote open and accountable management of mineral resources through systematic disclosures of data related to extractives sector management. This includes legal frameworks, licenses, contracts, beneficial ownership of companies, exploration, production, and export, receipts by government, community payments, and on all transactions across the extractive sector’s value chain. Milestones include hosting stakeholder consultations on the Sierra Leone Extractive Industry Transparency Initiative (SLEITI) Bill to enact it into law as well as mapping out and engaging MDAs and companies that hold extractive sector data.

This commitment is carried over from the fourth action plan, where extractives legislative framework was strengthened with the updating of the Open Data Policy, enacting the Mines and Minerals Development Act, and drafting the SLEITI Bill. Further, there was an effort to monitor and push for systematic and comprehensive information disclosure of extractive data.<sup>45</sup> The National Coordinator for National Advocacy Coalition on Extractives (NACE) noted that lack of transparency,<sup>46</sup> accountability and participation in management of extractive resources has continued to deprive mining communities of the benefits due to them, yet they are the most affected. This is despite the extractive industry contributing 0.6% to the GDP, 67% to the export earnings, 4.1% to total government revenues and 3% to employment.<sup>47</sup>

#### **Potential for results:** Substantial

The substantial potential in this commitment is in passing the SLEITI Bill and in increased systematic disclosure of extractive information by public and private entities. This will contribute

to institutionalization of good practice, increase transparency on extractive information and hence supporting citizens' engagement in extractives governance.

The National Coordinator for NACE<sup>48</sup> states that EITI remains a priority for CSOs, who see EITI as the space where good practices on transparency and accountability can be mainstreamed in government processes through formulation of laws and establishment of disclosure systems. The SLEITI Bill is one such law. The National Coordinator for SLEITI reported that there has been a back and forth on the SLEITI Bill, ongoing for the last 10 years.<sup>49</sup> They noted that the bill was reformulated, enriched, and renamed to Extractive Industries Transparency Initiative.<sup>50</sup>

The SLEITI office, the SLEITI multi-stakeholder group and CSO partners plan to take this bill to parliament in 2025. To pre-empt this, the Parliamentary Committee on Legislation and the Committee on Mines and Mineral were included in the review process and their input incorporated. Support was received from the Africa Centre for Energy Policy (ACEP), an agency from Ghana. Further, SLEITI and the multi-stakeholder group (MSG) sought support from CSOs and citizens, who were part of the review process. SLEITI is situated in the vice president's office, and it is anticipated that this high-level political backing will contribute to pushing the bill through in parliament.

The bill aims to set up SLEITI as an autonomous body, hence institutionalizing its mandate and securing financial provisions from government. It will give SLEITI more power to get extractive and other related data from government and mining companies; powers to enforce compliance on reporting and publishing beneficial ownership data; provide for establishment of various structures (SLEITI, MSG, etc.) and outline their mandate towards extractive transparency.<sup>51</sup> The Mines and Minerals Development Act provides a broad framework that governs the sector but lacks specific transparency provisions. To address this gap, the SLEITI Bill provides detailed provisions for beneficial ownership transparency and open data.<sup>52</sup> Therefore, the bill would strengthen the legislative framework for extractive sector transparency.

The Extractives Industries Transparency Initiative (formerly SLEITI Bill) aims to give power to SLEITI to enforce compliance on reporting and publishing beneficial ownership data in the sector. The National Coordinator for SLEITI noted that beneficial ownership transparency activities will be carried out under this commitment despite the lack of directly related milestones.<sup>53</sup> There is an opportunity to expand the commitment to include these milestones explicitly at the mid-way point. As of November 2024, Sierra Leone did not yet have a beneficial ownership register.<sup>54</sup> However, the SLEITI MSG had requested the Corporate Affairs Commission to initiate the process to establish a register. The drafting process for regulations for the Mines and Minerals Act were underway, that address beneficial ownership transparency requirements. A technical working group on beneficial ownership was established and a peer learning exchange held with Liberia.<sup>55</sup> EITI's 2024 work plan notes intentions to work with key agencies to map out strategies on a national approach to beneficial ownership (BO) implementation. It also intends to develop a concept note on national approach to BO, identifying lead institutions; and work with key agencies to establish a BO registry and installation of a BO register software. In the long term, lessons from other jurisdictions such as Nigeria<sup>56</sup> demonstrate that establishing a BO register for the extractives sector can lay the groundwork for an economy-wide register in the future.

To deliver on Milestone 2, SLEITI plans to map out and coordinate MDAs holding extractive sector data such as information on licensing, contracts, production, and revenue. These MDAs include the Bank of Sierra Leone, Financial Intelligence Unit, SLEITI, Ministry of Finance, National Mineral Agency, Environment Protection Agency, and National Revenue Authority. Currently, there are delays, discrepancies, and gaps in publication of extractive sector data. SLEITI aims to

reduce these by meeting regularly with MDs to facilitate publication. The National Coordinator for SLEITI noted that the SLEITI validation reports take 1 to 2 years to publish, and they have the challenge of dealing for conflicting data across the MDAs. In some instances, publication of data is delayed because one agency produces the data and another publishes it. Working closely with these MDAs may positively impact the turnaround in producing the report and potentially contribute to improved collaboration across the MDAs. This would mean timely information is available for strategic action.<sup>57</sup>

### **Opportunities, challenges, and recommendations during implementation**

Passage of the SLEITI Bill has been a longstanding aim in Sierra Leone. There is opportunity for open extractives reformers to work with champions in parliament to fast-track the passage of the bill. SLEITI and MSG have made efforts to onboard relevant parliamentary committees and respected regional entities. These entities have the potential to influence discussion and passing the bill. There is an opportunity to engage with ParICSONet and leverage citizen engagement platforms under Commitment 2. Given the commitment’s four-year time span, preparatory work for beneficial ownership transparency in extractives could also be undertaken in readiness for the passing of the law. This could include:

- **A cabinet memorandum to drive conversations and garner political buy-in**, followed by signing MOUs with stakeholder institutions and leadership at government level.
- **Strategic approach to donors who could provide technical and financial resources** to support BO transparency reform process, including and not limited to data collection and verification; capacity assessment and building for relevant institutions.
- **Awareness raising among government and non-government stakeholders** on what beneficial ownership data is and its value in the fight against corruption.
- **The Companies Act of 2009 and other relevant laws could be reviewed** to include provisions on beneficial ownership disclosure.<sup>58</sup> For instance, in Kenya, a multi-stakeholder group collaboratively identified and advocated for the necessary legal changes to support progress towards beneficial ownership transparency.

### **Other commitments**

Other commitments that the IRM did not identify as promising commitments are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments.

**Commitment 5** on inclusion of youth falls under the government’s “big five game changers” agenda. The National Youth Commission engaged youth to develop this commitment<sup>59</sup>. However, the milestones as designed do not have an open government lens. There is an opportunity to revise the commitment at mid-way point. Possibilities include involving youth in tracking the progress and implementation of the National Youth Policy and in development of the online platform. Implementers can find guidance and examples of youth empowerment through OGP commitments in the OGP Youth Toolkit.<sup>60</sup>

**Commitment 6** aims to establish and empower the Right to Access Information Commission (RAIC) and strengthen legislative framework around the right to information. While important, the milestones currently listed do not support this ambitious aim. Reformers can take advantage of the mid-point refresh process to add milestones that advance this objective. The Commission could consider development and passing clear procedures for requesting and obtaining

information from government agencies in partnership with citizens and CSOs. These procedures could include frameworks that hold government officials accountable for not disclosing information. In addition, given the four-year implementation period, reformers could seek to enact the Data Protection Bill and develop its regulations in collaboration with citizens and CSOs. The draft Data Protection Bill 2020 included individuals' access rights for their personal data.<sup>61</sup> OGP's "Data Protection in Africa" paper offers further guidance on how to ensure data protection legislation promotes transparency, accountability, and participation.<sup>62</sup>

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<sup>1</sup> National Council for Civic Education & Democracy, Facebook, 29 August 2023, <https://www.facebook.com/people/National-Council-for-Civic-Education-and-Democracy/100068658423989/?mibextid=ZbWKw%0AL%202024>; Edward Koroma

(Programmes Manager, Transparency International Sierra Leone), interview by IRM researcher, 28 June 2024.

<sup>2</sup> Bernard Abass Kargbo, "ACC Starts Nation-Wide Consultation for the Crafting of Next National Anti-Corruption Strategy," Anti-Corruption Commission, October 2023, [https://www.anticorruption.gov.sl/en\\_GB/blog/anti-corruption-commission-sl-news-room-1/post/acc-starts-nationwide-consultation-for-the-crafting-of-next-national-anti-corruption-strategy-1141](https://www.anticorruption.gov.sl/en_GB/blog/anti-corruption-commission-sl-news-room-1/post/acc-starts-nationwide-consultation-for-the-crafting-of-next-national-anti-corruption-strategy-1141).

<sup>3</sup> David Olusegun Sotola & Roberto Martinez B. Kukutschka, "Overview of Corruption and Anti-Corruption in Sierra Leone, Transparency International," 8 December 2023, <https://knowledgehub.transparency.org/helpdesk/overview-of-corruption-and-anti-corruption-in-sierra-leone-1>.

<sup>4</sup> E. Koroma, interview.

<sup>5</sup> E. Koroma, interview.

<sup>6</sup> E. Koroma, interview.

<sup>7</sup> Francis Ben Kaifala (Commissioner, National Anti-Corruption Strategy) & Nabillahi-Musa Kamara (Director, National Anti-Corruption Strategy), correspondence with IRM researcher, 3 June 2024.

<sup>8</sup> Sinnatu Bangura, "Integrity Management Committees: A Crucial Anti-Graft Outfit," Anti-Corruption Commission, August 2019, [https://www.anticorruption.gov.sl/en\\_GB/blog/anti-corruption-commission-sl-news-room-1/post/integrity-management-committees-a-crucial-anti-graft-outfit-799](https://www.anticorruption.gov.sl/en_GB/blog/anti-corruption-commission-sl-news-room-1/post/integrity-management-committees-a-crucial-anti-graft-outfit-799).

<sup>9</sup> E. Koroma, interview.

<sup>10</sup> "Strengthened Implementation of Anti-Corruption Measures and Compliance (SL0034)," Open Government Partnership, 2024, <https://www.opengovpartnership.org/members/sierra-leone/commitments/SL0034>.

<sup>11</sup> Kaifala & N. Kamara, correspondence.

<sup>12</sup> E. Koroma, interview.

<sup>13</sup> Kaifala & N. Kamara, correspondence.

<sup>14</sup> E. Koroma, interview.

<sup>15</sup> Patrick Sandi, "Sierra Leone Records Huge Reduction in Corruption Prevalence Levels in Key Institutions According to the 2022 Afro-Barometer Report," Anti-Corruption Commission, April 2023, [https://www.anticorruption.gov.sl/en\\_GB/blog/anti-corruption-commission-sl-news-room-1/post/sierra-leone-records-huge-reduction-in-corruption-prevalence-levels-in-key-institutions-according-to-the-2022-afro-barometer-report-1032](https://www.anticorruption.gov.sl/en_GB/blog/anti-corruption-commission-sl-news-room-1/post/sierra-leone-records-huge-reduction-in-corruption-prevalence-levels-in-key-institutions-according-to-the-2022-afro-barometer-report-1032).

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<sup>17</sup> E. Koroma, interview.

<sup>18</sup> E. Koroma, interview.

<sup>19</sup> Kaifala & N. Kamara, correspondence.

<sup>20</sup> Kaifala & N. Kamara, correspondence.

<sup>21</sup> Kaifala & N. Kamara, correspondence.

<sup>22</sup> E. Koroma, interview.

<sup>23</sup> Mohamed Jalloh (Director of Training and Strategy, Parliament of Sierra Leone), interview by IRM researcher, 16 July 2024; Alusine Diamond-Suma (Sierra Leone Country Director, Westminster Foundation for Democracy), interview by IRM researcher, 12 September 2024.

<sup>24</sup> Diamond-Suma, interview.

<sup>25</sup> "Africa Open Parliament Index 2022," Parliamentary Network Africa, 2022, <https://parliamentafrica.com/africa-open-parliament-index-2022-final-report-english>.

<sup>26</sup> "Parliament of Sierra Leone," Parliament of Sierra Leone, <https://www.parliament.gov.sl>.

<sup>27</sup> Diamond-Suma, interview.

<sup>28</sup> Diamond-Suma, interview.

<sup>29</sup> Jalloh, interview.

<sup>30</sup> Jalloh, interview.

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- <sup>33</sup> Jalloh, interview.
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- <sup>38</sup> Diamond-Suma, interview.
- <sup>39</sup> Jalloh, interview.
- <sup>40</sup> Diamond-Suma, interview.
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- <sup>42</sup> “Parliament of Sierra Leone Strategic Plan 2021–2025,” Parliament of Sierra Leone, 2021, <https://www.parliament.gov.sl/images/pdf/Sierra-Leone-Parliament-Strategic-Plan-2021-2025.pdf>.
- <sup>43</sup> Jalloh, interview.
- <sup>44</sup> Diamond-Suma, interview.
- <sup>45</sup> Josephine Njungi & Evans Kibet, “IRM Results Report: Sierra Leone 2021–2023,” Open Government Partnership, 12 August 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/08/Sierra-Leone\\_Results-Report\\_2021-2023.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/08/Sierra-Leone_Results-Report_2021-2023.pdf).
- <sup>46</sup> Cecilia Mattia (National Coordinator, National Advocacy Coalition on Extractives), interview by IRM researcher, 27 May 2024.
- <sup>47</sup> International Trade Administration, “Sierra Leone - Country Commercial Guide,” United States Department of Commerce, 17 April 2024, <https://www.trade.gov/country-commercial-guides/sierra-leone-mining-and-mineral-resources>.
- <sup>48</sup> Mattia, interview.
- <sup>49</sup> Bampia James Bundu, “SLEITI Bill Under Scrutiny,” Politico SL, 20 March 2014, <https://www.politicosl.com/articles/sleiti-bill-under-scrutiny>.
- <sup>50</sup> Mohamed Baimba Koroma (National Coordinator, SLEITI Secretariat), interview by IRM researcher, 28 June 2024.
- <sup>51</sup> The IRM received an unpublished Draft Sierra Leone Extractive Industries Transparency Initiative Bill to review.
- <sup>52</sup> M. B. Koroma, interview.
- <sup>53</sup> M. B. Koroma, interview.
- <sup>54</sup> “Sierra Leone,” Open Ownership, accessed 27 November 2024, <https://www.openownership.org/en/map/country/sierra-leone>.
- <sup>55</sup> Mattia, interview.
- <sup>56</sup> “OGP Nigeria National Action Plan 2023–2025,” Open Government Partnership Nigeria, 1 March 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/03/Nigeria\\_Action-Plan\\_2023-2025.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/03/Nigeria_Action-Plan_2023-2025.pdf).
- <sup>57</sup> M. B. Koroma, interview.
- <sup>58</sup> Favour Ime (Senior Regional Manager for Africa, Open Ownership), correspondence with IRM researcher, 10 June 2024.
- <sup>59</sup> Emerson Kamara (Deputy Commissioner, National Youth Commission), interview by IRM researcher, 12 June 2024.
- <sup>60</sup> “2022 OGP Youth Toolkit,” Accountability Lab & Open Government Partnership, 3 August 2022, <https://www.opengovpartnership.org/documents/2022-ogp-youth-toolkit>.
- <sup>61</sup> “Government of Sierra Leone National Data Strategy: Development of an Inclusive Data Economy,” Ministry of Information & Communication, January 2023, [https://moic.gov.sl/wp-content/uploads/2023/07/SierraLeone\\_NationalDataStrategy\\_2023\\_v1.pdf](https://moic.gov.sl/wp-content/uploads/2023/07/SierraLeone_NationalDataStrategy_2023_v1.pdf).
- <sup>62</sup> “Data Protection in Africa: A Look at OGP Member Progress,” Open Government Partnership, 11 August 2021, <https://www.opengovpartnership.org/documents/data-protection-in-africa-a-look-at-ogp-member-progress>.



## 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.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In 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? Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, et cetera)? Will the government improve legal, policy, institutional or practical conditions related to civic space such as freedom of expression, association and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking or fostering an independent news media ecosystem)?
- **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 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 Josephine Njungi with support from Evans Kibet and was externally expert reviewed by Brendan Halloran. The IRM methodology, quality of IRM products, and review process are overseen by IRM’s IEP. For more information, see the IRM Overview section of the OGP website.<sup>1</sup>

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<sup>1</sup> “Overview – Independent Reporting Mechanism,” Open Government Partnership, accessed 15 July 2024, <https://www.opengovpartnership.org/irm-guidance-overview>.

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

### Commitment 1: Strengthened Domestic Implementation of Anti-Corruption Measures and Compliance

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

### Commitment 2: Open Parliament

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial

### Commitment 3: Systematic Disclosure of Beneficial Ownership and Extractive Data

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial

### Commitment 4: Access to Justice for All

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

### Commitment 5: Inclusion of Youths in Public Works and Infrastructure projects

- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Unclear

### Commitment 6: Empowering Citizens through Access to Information

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

<sup>1</sup> **Editorial note:** Commitment short titles may have been edited for brevity. For the complete text of commitments, see “Sierra Leone Open Government Partnership (OGP) National Action Plan 5 2024–2028,” National Council for Civic Education and Democracy, 14 February 2024, <https://www.opengovpartnership.org/documents/sierra-leone-action-plan-2024-2028>.

## Annex 2: Action Plan Co-Creation

The OGP Participation and Co-Creation Standards are guidelines to support OGP members in undertaking collaborative OGP processes.<sup>1</sup> The Standards include minimum requirements that set a baseline for participatory and transparent OGP processes. In the Action Plan Review, the IRM assesses compliance with the minimum requirements applicable during co-creation of the action plan.<sup>2</sup> Members that have not met all minimum requirements are considered acting contrary to OGP process.

Sierra Leone is not acting according to OGP process, as they did not meet all the minimum requirements applicable during development of the action plan. The IRM will assess Sierra Leone’s compliance with OGP process again in two years. Members that are currently not acting according to OGP process can rectify their status by meeting the minimum requirements relevant at the next moment of assessment.<sup>3</sup>

**Table 2. Compliance with minimum requirements**

Minimum requirement	Met?
<b>1.1 Space for dialogue:</b> Sierra Leone’s OGP Steering Committee held several meetings over the co-creation period, including a co-creation kick-off, to review public input, and to review the draft before finalization. Basic information on the Steering Committee is not available on the OGP Sierra Leone webpage, as the latest meeting minutes are from January 2023, prior to the co-creation period. <sup>4</sup>	No
<b>2.1 OGP website:</b> OGP Sierra Leone has a dedicated webpage on the National Council for Civic Education and Democracy (NaCCED) <sup>5</sup> website. It includes current and past action plans <sup>6</sup> and other relevant documents.	Yes
<b>2.2 Repository:</b> NaCCED website includes the latest action plan, previous Results Reports, minutes of the Steering Committee meetings and other OGP public engagement reports. The portal contained up to date information including a parliamentary launch of NAP V that took place in May 2024. <sup>7</sup>	Yes
<b>3.1 Advanced notice:</b> A proposed roadmap for co-creation was published on the NaCCED website indicating opportunities for participation. <sup>8</sup> The timeline was ultimately adjusted, taking place from 17 November until 8 December 2023. Media updates were provided on co-creation progress and upcoming plans. <sup>9</sup>	Yes
<b>3.2 Outreach:</b> The OGP Coordinator visited various MDAs to share the upcoming development of NAP V. <sup>10</sup> The OGP secretariat <sup>11</sup> created awareness on social media platforms, introducing OGP and inviting citizens to give input. WFD <sup>12</sup> supported public awareness and consultations on X. Also, joint consultations with CSOs, validation meetings and the launch were held.	Yes
<b>3.3 Feedback mechanism:</b> The final action plan was subjected to a stakeholder validation on 9 February 2024. <sup>13</sup> This meeting sought to ensure all comments were incorporated and that commitments were in line with government priorities and the OGP Challenge. The validation process brought in views of stakeholders who were not involved in drafting the commitments. <sup>14</sup> There was good communication throughout the process. <sup>15</sup> The steering committee used multiple channels of communication, including emails, calls and social media, to solicit input from all stakeholders and provide feedback. <sup>16</sup>	Yes
<b>4.1 Reasoned response:</b> The Secretariat continuously shared versions of the action plan for inputs from the start to the validation meeting on 9 February 2024. <sup>17</sup> Members of the Steering Committee, multi-stakeholder committee, and commitment holders in government discussed and incorporated feedback into the action plan. <sup>18</sup>	Yes

<b>5.1 Open implementation:</b> 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
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There were some noteworthy actions by the OGP Secretariat and steering committee in the development of this action plan. The Sierra Leone OGP Secretariat and NaCCED leveraged their good relationship with national and local media and social media to share the co-creation process and airing live some of their consultation processes. This contributed to broadening the scope of engagement. There is an opportunity to include grassroots engagement using physical meetings for those in rural areas and do not have access to internet. The team was intentional in aligning the commitments to the government’s five-point agenda. There is expectation that this alignment and a four-year length will contribute to higher levels of ownership by MDAs and completion of the commitment.

<sup>1</sup> “OGP Participation and Co-Creation Standards,” Open Government Partnership, 24 November 2021,

[www.opengovpartnership.org/ogp-participation-co-creation-standards](http://www.opengovpartnership.org/ogp-participation-co-creation-standards).

<sup>2</sup> “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, 31 May 2022,

[www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements](http://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements).

<sup>3</sup> Editorial note: For two-year action plans, the IRM will assess compliance with minimum requirements applicable to implementation in the Results Report. For four-year action plans, the IRM will do so in the Midterm Review. For all action plans, the IRM will provide a comprehensive analysis of participation and co-creation practices throughout the action plan cycle in the Results Report. See: “OGP National Handbook – Rules and Guidance for Participants (2024),” Open Government Partnership, 11 April 2024, [www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024](http://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024).

<sup>4</sup> “Open Government Partnership (OGP),” National Council for Civic Education & Democracy, <https://www.nacced.gov.sl/ogp>.

<sup>5</sup> “Open Government Partnership (OGP),” National Council for Civic Education & Democracy.

<sup>6</sup> “Sierra Leone Open Government Partnership (OGP) National Action Plan 5 2024–2028,” National Council for Civic Education and Democracy, 14 February 2024, <https://www.opengovpartnership.org/documents/sierra-leone-action-plan-2024-2028>.

<sup>7</sup> “Open Government Partnership (OGP),” National Council for Civic Education & Democracy.

<sup>8</sup> “Open Government Partnership - Sierra Leone NAP 5 Development Timelines,” National Council for Civic Education & Democracy, August 2023, [https://www.nacced.gov.sl/wp-content/uploads/2023/08/Time-line-for-NAP-5-development\\_WFD-input.pdf](https://www.nacced.gov.sl/wp-content/uploads/2023/08/Time-line-for-NAP-5-development_WFD-input.pdf).

<sup>9</sup> The Sierra Leone OGP Coordinator provided an update on the OGP process during a press conference at the Ministry of Foreign Affairs. See: National Council for Civic Education & Democracy, Facebook, 24 January 2024,

<https://www.facebook.com/p/National-Council-for-Civic-Education-and-Democracy-100068658423989>.

<sup>10</sup> National Council for Civic Education & Democracy, Facebook, 29 August 2023, <https://www.facebook.com/people/National-Council-for-Civic-Education-and-Democracy/100068658423989/?mibextid=ZbWKw%0AL%202024>.

<sup>11</sup> Hannah Jimmy (Coordinator, Sierra Leone OGP Secretariat), interview by IRM researcher, 21 April 2023.

<sup>12</sup> WFD Sierra Leone, “NACCED and the OGP Steering Committee Commence the 5th National Action Plan (NAP5) Development Process,” X, 17 November 2023, [https://x.com/WFD\\_SierraLeone/status/1725449656040096166](https://x.com/WFD_SierraLeone/status/1725449656040096166).

<sup>13</sup> National Council for Civic Education & Democracy, “Validation meeting with Steering Committee Members,” Facebook, 12 February 2024, <https://www.facebook.com/p/National-Council-for-Civic-Education-and-Democracy-100068658423989>; Jimmy, interview.

<sup>14</sup> Mohamed Jalloh (Director of Training and Strategy, Parliament of Sierra Leone), interview by IRM researcher, 16 July 2024.

<sup>15</sup> Mohamed Baimba Koroma (National Coordinator, SLEITI Secretariat), interview by IRM researcher, 28 June 2024.

<sup>16</sup> Emerson Kamara (Deputy Commissioner, National Youth Commission), interview by IRM researcher, 12 June 2024.

<sup>17</sup> E. Kamara, interview; National Council for Civic Education & Democracy, “Validation meeting with Steering Committee Members,” Facebook.

<sup>18</sup> M. B. Koroma, interview; Alusine Diamond-Suma (Sierra Leone Country Director, Westminster Foundation for Democracy), interview by IRM researcher, 12 September 2024.