

Corruption in Education Systems in West Africa

Policy Paper, May 2019

Introduction

Corruption is commonplace in education systems across the Economic Community of West African States (ECOWAS). This affects education access, quality, inclusion and learning outcomes with devastating consequences, not only for national economic growth but also for the life chances of children, their families and communities.

Education is a fundamental human right and a major driver of human and economic development. It shapes the societies in which we live and strengthens personal agency. Corruption in education represents a major violation of that right and is a significant barrier to generations of children and young people realising their potential. This briefing outlines the key education corruption risks and challenges in the ECOWAS region, with specific focus on four countries – Ghana, Liberia, Niger and Senegal – and reference to neighbouring Nigeria.

Time to act

- The Sustainable Development Goals (SDGs) and the African Union (AU) Agenda 2063 have recognised that the fight against poverty will not be won without direct action against corruption. SDG 16 on peace, justice and sustainable institutions commits countries to substantially reducing corruption and bribery in all their forms (16.5) and developing effective, accountable and transparent institutions at all levels (16.6).
- The Education 2030 Framework for Action underpinning SDG 4 on inclusive, good quality education commits governments to challenging and exposing the misuse of education funds and recognises the need for a “co-ordinated approach and mutual accountability system”.¹
- A recent paper from the Global Partnership for Education, the multi-stakeholder partnership for education, reiterated the Partnership’s zero tolerance for misuse of funds.²
- In 2018, the AU declared 11 July as “Africa Anti-Corruption Day”.

This briefing assesses the status of anti-corruption efforts and education priorities at the sub-regional ECOWAS level and advocates for a stronger response to tackling corruption in education systems. It speaks to the priorities set by the ECOWAS Conference of Education Ministers held in Lomé, Togo in September 2017, which committed to harmonising education systems across the region. Collectively, these inter-governmental initiatives provide an opportunity to tackle systemic corruption in the education sector.

Education and corruption

Education systems are particularly vulnerable to corruption

- Education systems handle large funding volumes, often around 20 per cent of national budgets.
- They are complex, with often weak financial management (poor accountability and weak absorptive capacity) and autonomous institutions which can facilitate fraud and indiscretion.
- Ministries of education employ many thousands of personnel, creating scope for patronage or nepotism in appointments and payroll fraud, including ghost workers.
- Where bribery and fraud are entrenched as the cultural norm, it may be difficult for students, parents and officials to avoid the use of financial incentives to facilitate educational “achievement” and progression.³

Corruption in education has greatest impact on the poorest, most marginalised communities

Such groups are least able to bear the additional costs of bribes for admissions, or to protect and equip themselves against corrupt practices. Girls are at risk of gender-based violence in schools, where they may be expected to provide sex for grades or suffer other sexual harassment and abuse in return for “favours” from staff and other, often older learners. Vulnerable children may be forced to drop out of school if they cannot pay hidden costs or unauthorised fees. A corrupted education system helps embed social acceptance of corruption, perpetuating the cycle. Conversely, education has the potential to strengthen personal integrity and offer an effective antidote to corruption.

Corruption threatens the right to education

Corruption and poor governance are major impediments to realising the right to inclusive and equitable quality education for all and to reaching global development goals. The right to education is enshrined in international and continental conventions and charters, ratified by Ghana, Liberia, Niger and Senegal (with one exception – see below), such as:

- Convention on the Rights of the Child
- Convention on the Elimination of Discrimination Against Women
- Convention on the Rights of Persons with Disabilities
- African Charter on Human and People’s Rights
- African Charter on the Rights and Welfare of the Child (not ratified by Liberia).

At the national level, Ghana, Liberia, Senegal and Niger have compulsory education laws enshrined in their national constitutions and education acts providing a strong legal basis for fighting violations of education rights, including those resulting from corrupt behaviour.

Corruption in education systems manifests at different levels

Rigorous research has identified various types and forms of corruption to be found in education systems of the four focus countries (see [Table 1](#)). This covers a wide range of corrupt practices, from large-scale resource misallocation to petty corruption. Interviews with representatives from Transparency International chapters across ECOWAS, along with existing literature, indicate that these corrupt practices have implications for sectoral priorities and institutional commitments within the sub-region.

Table 1: A classification of corrupt practices in education⁴

Area	Corrupt practices
Policymaking	
Political influence	<ul style="list-style-type: none"> • political influence in definition of educational policy and priorities • bribes and political considerations in school district mapping, school locations, and accreditation systems for educational professionals, etc.
Organisational resources	
Finance	<ul style="list-style-type: none"> • political influence and bribes in resource allocation • violation of rules and procedures • inflation of costs and activities • embezzlement and bribes; budget leaks and fraud in transfer of budgets • diversion of public money into private accounts • embezzlement of funds raised by local NGOs and parent organisations
Allowances, fellowships and subsidies	<ul style="list-style-type: none"> • favouritism, nepotism and discrimination • Unclear criteria or bypassing of criteria
Institutional accreditation	<ul style="list-style-type: none"> • fraud in designation (e.g. via favouritism, bribes and gifts)
Teacher management (appointment, transfer, promotion, payment and training)	<ul style="list-style-type: none"> • fraud in appointment and deployment • discrimination and favouritism • falsification of credentials, use of fake diplomas • bypassing of criteria (e.g. unbalanced distribution of teachers) • pay delay, unauthorised deductions • ghost teachers (absenteeism)
Teacher behaviour (professional misconduct)	<ul style="list-style-type: none"> • absenteeism

Area	Corrupt practices
	<ul style="list-style-type: none"> • charging of illegal fees (e.g. for school entrance, examinations) • gift acceptance • private tutoring (including use of schools for private purposes paid for by public funds)

Area	Corrupt practices
Procurement	
School infrastructure (construction, maintenance and repairs) and school services (transport, boarding, textbooks, canteens and meals)	<ul style="list-style-type: none"> • fraud in public tendering, including bribes to influence procurement processes • supplier and contractor collusion • embezzlement • cost overruns and overpricing • ghost deliveries and siphoning school supplies • purchase of unnecessary or inferior equipment and materials • unequal distribution and ineffective distribution monitoring system • textbook black markets
Research and textbook writing	<ul style="list-style-type: none"> • fraud in research, plagiarism • fraud in textbook author selection • bypassing of copyright law • compulsory purchase of textbooks • private sector interests skewing research agendas
Service delivery / client interface	
Examinations, access to universities and award of diplomas	<ul style="list-style-type: none"> • selling of information • fraud in examinations (e.g. impersonation, cheating, favouritism and gifts) • bribes (e.g. for high marks, diplomas and admissions) • diploma mills and false credentials

Corruption in education in West Africa

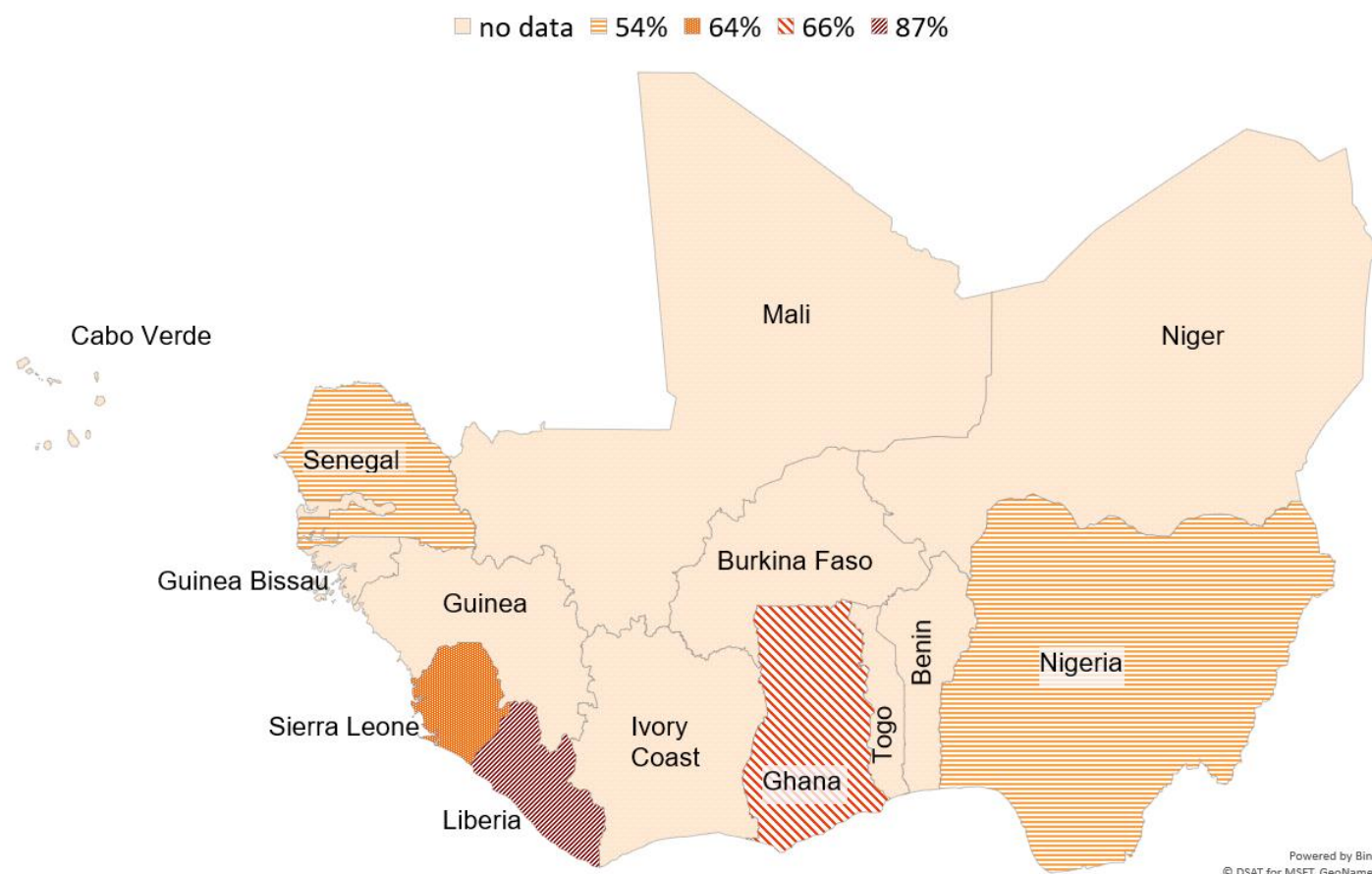


Fig.1 Perception of corruption: percentage who think education system is corrupt or extremely corrupt⁵

Ghana, Liberia, Niger and Senegal are signatories to key international conventions guaranteeing education rights and anti-corruption efforts, including the UN Convention against Corruption (2003) and the African Union Convention on Preventing and Combating Corruption (2003). All four countries have legislation in place which guarantees the right to education and have some form of non-sector-specific anti-corruption legislation or provisions against corruption within criminal law (see Annex for details). Although the strength of anti-corruption efforts varies across the region – with Niger being notably weak – legislation in all countries has established anti-corruption institutions. In addition, there are non-legislative responses in place, such as codes of conduct that outline the standards of behaviour expected of public servants, including teachers.

Continental efforts to address corruption

Various African instruments challenge corruption, including the African Union Convention on Preventing and Combating Corruption (AUCPCC, 2003) and others aimed at fostering a culture of democracy and ensuring good governance and the rule of law. The African Union Advisory Board on Corruption (AUABC) was established to monitor enforcement of the Convention and has a mandate to promote and encourage the adoption of measures and actions by states to prevent, detect, punish and eradicate corruption. Other complementary instruments to the AUCPCC include the African Charter on Democracy, Elections and Governance, the African Charter on the Values and Principles of the Public Service and Administration, and the African Charter on the Values and Principles of Decentralisation, Local Governance and Local Development.

Our review highlighted various corruption risks and challenges facing education systems that are common to all countries, including resource misallocation, corrupt procurement, exchange of sex for grades, examination malpractices, fake qualifications, teacher absenteeism and corrupt recruitment practices. These commonalities offer leverage for countries to work together on an anti-corruption agenda, which will see them implement targeted actions to address corruption risks and vulnerabilities in their respective education systems.

Ghana

Corruption in the Ghanaian education system has been linked to excessive bureaucracy which facilitates embezzlement of funds and systemic abuses, leading to a loss of trust and credibility.⁶ Studies by the Ghana Integrity Initiative (GII) have highlighted extensive corruption across the sector, with an estimated one in three people likely to engage in corrupt acts in the education sector.⁷ The following were noted as particular challenges:

- diversion of funds from government accounts
- cumbersome bureaucracy encouraging bribery to expedite decision making
- lack of transparency and accountability for education funds at local level (including failure to engage civil society, parents and communities)
- inflation of wage bill (ghost teachers) and enrolment numbers for higher capitation grant payments
- favouritism in teacher recruitment and promotion (based on politics, ethnicity, gender, nepotism)
- teacher absenteeism and poor supervision and inspection leading to poor quality education and learning outcomes; in turn, this encourages bribery for grades and transition routes
- kickbacks in school construction
- corrupt procurement and diversion of materials to local markets

Senegal

The education system in Senegal, although not regarded as highly corrupt, has weaknesses that render it vulnerable to corruption.⁹ The following have been identified as key corruption risks:

- budget misappropriation and leakage
- fraudulent contracts awarded for school construction
- cheating in examinations and selling of question papers
- bribes for boarding rooms and scholarships
- parallel systems of tutorial teaching, reducing classroom contact time
- unauthorised registration fees
- selling of school furniture and textbooks in local markets, often by teachers to supplement their income.¹⁰

There have been serious concerns about the allocation of resources to regional inspections that rarely take place, raising questions about funding and staffing provided at the regional level.¹¹

Senegal participated in the National Education Accounts initiative with UNESCO in 2018. This tracks and classifies multiple data from key funding sources – public resources, private

- corrupt management of examination procedures, including selling of test scores, change of grade, grade-to-grade promotions and admissions, especially at secondary and tertiary level
- imposition of additional unauthorised fees on students at school level.⁸

As a result, GII has worked to strengthen community-based monitoring and evaluation teams to improve accountability at local level.

spending and external funding – into a common framework which allows for better targeting of educational resources, improved policy decisions, and monitoring of progress towards SDG 4.¹²

The country developed its sub-national Education Accounts in 2018, creating an opportunity to strengthen accountability and reduce corruption. The report is available [here](#).

Liberia

In Liberia, donor financing of the education sector has equalled nearly 50 per cent of the Ministry of Education budget in recent years, yet the absorptive capacity and financial management of the ministry is acknowledged to be weak,¹³ creating opportunities for corruption. Failure to implement decentralisation effectively and devolve management and decision making to county level means that budget allocations do not routinely materialise. Instead, bribery is commonplace, as is diversion of supplies to local private markets, facilitated by collusion between transport agents and central Ministry of Education officials.¹⁴

Procurement more broadly is at high risk of corruption, facilitated by corrupt public officials and a collusive business environment. Contributing factors include:

- centralisation of decision making
- weak oversight
- inadequate monitoring
- poor transparency of budget and procurement information at school level
- poor complaints and accountability mechanisms
- failure to standardise or meet quality standards of school construction¹⁵
- entrenched culture of impunity.

School-level management, accountability and supervision are critical challenges, including teacher absenteeism and other code-of-conduct violations such as routine sexual abuse and harassment of girls in return for grades (known as “sextortion”). Public-private partnerships, such as the Bridge International Academies, have been identified as lacking transparency and restricting access to education.¹⁶ Limited resources and logistical challenges at county and district level mean that regular school inspections and administrative hearings on teacher offences do not occur “with the regularity envisioned in policy”.¹⁷

Several national legal frameworks and instruments are in place to tackle corruption, but their effectiveness remains limited. The Coalition for Transparency and Accountability in Education (COTAE) monitors the education budget, conducting policy advocacy in this area. In 2017 Integrity Clubs were established by Students Against Corruption and the Liberia Anti-Corruption Commission in 10 public high schools. Some 365 students were appointed as Anti-Corruption Ambassadors with the responsibility to monitor corruption in their schools.¹⁸

Niger

Fake teacher diplomas and ghost teachers have long been a high-profile issue in Niger’s education sector. Corruption more broadly is a serious issue, ranging from petty and bureaucratic corruption to grand and political corruption in a context of very weak public services, poor administrative controls and low salaries.¹⁹ Education sector corruption manifests in:

- misuse of resources, including incompetent service provision and racketeering in procurement, especially where the construction of schools is concerned
- poor human resource management, including non-payment of salaries and favouritism in promotions

- political interference in education
- diversion of resources from local level at different stages of the distribution chain
- sex for grades, particularly targeting female learners
- parallel enrolment of learners in schools
- examination malpractices.²⁰

In 2008, the finance and administration director of examinations and the secretary general of the basic education ministry were arrested for accepting bribes.²¹ Four billion CFA (US\$8 million) disappeared from the education budget in 2007, yet the high court trial of two former education ministers and several high-ranking civil servants for embezzlement continues to be delayed. The results of corruption in Niger include extremely poor quality physical infrastructure and content of education provision, and a shockingly low literacy rate of 28.7 per cent. The current Issoufou government initially appeared to take corruption more seriously; public officials were charged with corruption offences and new anti-corruption institutions were set up to address all levels of corruption in government, such as the *Haute Autorité de Lutte contre la Corruption et les Infractions Assimilées* in 2011. However, the recent purchase of a luxurious government jet and accusations of high-profile public officials' involvement in human trafficking have brought into question the credibility of these efforts.²²

ECOWAS and corruption in education

ECOWAS anti-corruption framework

Most ECOWAS member states, including Ghana, Liberia, Niger and Senegal, have ratified both the UN Convention against Corruption and the African Union Convention on Preventing and Combating Corruption. At the West Africa sub-regional level, the ECOWAS Protocol on the Fight against Corruption and the Community's Vision 2020 promote the principles of good political and economic governance, transparency and accountability in the use of public resources and an aggressive anti-corruption stance.²³ See [Table 2](#) for a summary of ECOWAS anti-corruption frameworks.

Table 2: Summary of ECOWAS anti-corruption frameworks

Anti-corruption framework
Protocol on the Fight against Corruption 2001 Obligations of parties to the Protocol involve prevention, criminalisation and international cooperation.
Community Court of Justice (CCJ) for ECOWAS The CCJ has, among other competencies, the jurisdiction to hear human rights cases based on general principles of international and regional human rights law (supplementary protocol A/SP.1/01/05). The judgments of the court are binding on member states.
ECOWAS Vision 2020 Theme III recognises the “urgent need” to strengthen democratic governance according to international standards. It envisions a unified region governed using principles of good political and economic governance, transparency and accountability in the use of public resources.
ECOWAS Whistleblower Protection Strategy 2017

ECOWAS education framework

The ECOWAS education strategy is guided by priorities identified at the biennial ECOWAS Conference of Ministers and by the African Union Continental Strategy for Education (2016–2025). The priorities are legally underpinned by the ECOWAS Protocol on Education and Training and the ECOWAS Convention on the Equivalence of Certificates and informed by the ECOWAS Vision 2020. **None of these documents makes any reference to the challenges of corruption in West African education systems.** A 2010 review of the education management information systems in ECOWAS similarly failed to mention transparency and accountability, pointing to a wider lack of recognition of widespread corrupt practices in education systems across the region.²⁰

Table 3: Summary of ECOWAS education framework

Education framework
Legal

ECOWAS Revised Treaty 2010 Article 27 commits the regional economic community to “harmonise the educational systems to adapt better educational, scientific and technical training to the specific development needs of the West African environment”. Article 60 reiterates this intention. Article 57 says “Member States undertake to co-operate in judicial and legal matters with a view to harmonising their judicial and legal systems”.

ECOWAS Protocol on Education and Training 2003 commits member states to harmonising education systems; promotes cooperation across levels of the education system, including teacher education and publication of resources.

Convention on the mutual recognition of Degrees, Diplomas, Certificates and other Qualifications 2013
Institutional / strategic

Department of Education, Science and Culture strategy hinges on priorities adopted at biennial ECOWAS Conference of Ministers in charge of General Education and Meeting of ECOWAS Ministers in charge of Higher Education and Scientific Research.

ECOWAS Technical and Vocational Education and Training Strategy for Skills Improvement and Employability (ETSSIE) 2017-2026, May 2017 Priorities focus on building additional technical and vocational training centres, reforming curricula and strengthening quality of service delivery and learning outcomes. The strategy also sets out the intention to improve governance in the sector, regulating providers and ensuring regular monitoring and inspections, and establishing a regulating and co-ordinating body.

Framework for the Harmonisation of Basic Education in the ECOWAS, August 2017. This is a tool to implement the Protocol on Education and Training and to harmonise basic education to “facilitate the establishment of Equivalence of Certificates” and “streamlining of the Basic Education in all ECOWAS Member States in terms of duration, content and overall management”²⁴. The Framework includes commitment to mobilising resources, including public-private partnerships and sharing best practices, including good governance.

Only limited information about the priorities and activities of the ECOWAS Directorate for Education, Science and Culture is publicly available. Online materials are not comprehensive, websites are out of date and responses were not received to written enquiries despite attempts to contact the Directorate via email. This lack of transparency makes civil society engagement with ECOWAS on education and corruption issues difficult. However, dialogue has recently started between the Directorate and the African Network Campaign for Education for All after months of advocacy, which shows promise for enhanced transparency going forward.

Coordination efforts

The report from the latest education ministers’ meeting (September 2017) declared the education sector across the region to be in a “state of emergency” for the next 10 years, although precisely what this refers to is unclear.²⁵ The conference committed to standardising basic education to nine years of age across the region and establishing the equivalent of accreditation to facilitate cross-border migration and employment. The ministers prioritised establishing a specialised ECOWAS agency to focus on strengthening education systems, with the following three priorities:

1. Institutional governance, quality assurance of the system, remediation of crisis in the educational system
2. Curriculum reform, to satisfy the requirements for professionalisation and mutual recognition of certificates
3. Resource mobilisation (technical and financial).²⁶

The ministers committed to advocating for an innovative financing mechanism based on models using natural resource levies (Nigeria) and supplementary value-added tax (Ghana) specifically to finance infrastructure. They also called for a 10 per cent increase in domestic financing over ten years to support neglected sub-sectors such as science, technology, engineering and mathematics (STEM), research and innovation, and youth programmes.²⁷

An opportunity to align education and anti-corruption efforts under ECOWAS

It is not the norm to have anti-corruption legislation specific to the education (or any) sector.²⁸ Rather, education systems rely on the general laws that promote transparency and that establish anti-corruption institutions and frameworks, an active civil society and a free press for accountability. This is then supported by sector-specific, non-legislative responses such as codes of conduct or risk assessments. In Sierra Leone, for instance, the anti-corruption commission assessed integrity risks in the education sector and proposed mitigation measures.²⁹ Closer collaboration between government agencies can also be effective. In Nigeria, the anti-corruption body has offices in line ministries, including education, and the right

to attend working meetings and review documents.³⁰ More concerted sector-specific interventions have the potential to help reduce corruption in the region.

The ECOWAS Community Court of Justice (CCJ) has the jurisdiction to hear human rights cases based on general principles of international and regional human rights law and CCJ judgements are binding on member states. At national level, a state's failure to investigate and tackle systemic corruption can be a breach of human rights, including the right to education. On this basis, the Socio-Economic Rights and Accountability Project brought a case against Nigeria in 2009 for contributing to the denial of education "by failure to seriously address all allegations of corruption at the highest levels of government and the levels of impunity that facilitate corruption in Nigeria".³¹ The CCJ found that corruption in education could constitute a violation of the right to education when no efforts are made to bring corrupt officials to account. It also noted that the government was responsible for making up financing shortfalls to ensure the right to education was not denied. However, the Nigerian state took no action and failed to comply with the CCJ ruling. More proactive enforcement by ECOWAS CCJ, supported by stronger political will, may have achieved a different outcome.

ECOWAS strategic priorities in education are at high risk of corruption. As we have seen, there is evidence of large-scale embezzlement of public education funding (Niger) and falsification of grades, certification and accreditation (Ghana, Senegal, Liberia) in the region. ECOWAS could play a much more active role in putting the fight against corruption on the political agenda by leveraging the momentum created by the SDGs, the Education 2030 Framework for Action, the latest replenishment round of the Global Partnership for Education and the AU's focus on anti-corruption. This is both a moral and an economic imperative, considering the regional development benefits that good quality, equitable education would bring, if managed effectively. Having committed itself to an "aggressive anti-corruption stance,"³² ECOWAS is in a strong position to harness the opportunity of a refreshed and strengthened education strategy to positively influence member states and assist governments in tackling corruption in education.

Anti-corruption interventions in the education sector

The UN Development Programme (UNDP) has developed a high-level framework for policy responses and anti-corruption interventions in the education sector. This is aimed at helping policymakers understand whether responses to identified corruption risks should be made in terms of:

- rule of law (e.g. policy, legislation, codes of conduct)
- public administration system reform (e.g. whistleblower measures)
- transparency and accountability measures (e.g. participatory monitoring, public expenditure tracking surveys³³)
- capacity development (e.g. institutional reforms, training).

Although there is overlap between approaches, especially those driven by general good governance reforms, this framework provides a clear link between the type of corruption risk and the required response. Accordingly, recommendations for ECOWAS to strengthen its response to corrupt practices in education systems across the region are set out below. The lead-up to the next ECOWAS education ministers conference in September 2019 provides a good opportunity to develop the political and technical momentum required.

Recommendations

Corruption risks identified	Countries affected	Recommendation to ECOWAS
General good governance		
Widespread corruption in education systems Political interference in education systems Weak enforcement of laws, policies and regulations on corruption and bad governance	All	Prioritise zero-tolerance approach to corruption in member state education systems. Initiate and champion rights-based approaches. Set targets informed by Transparency International's indicators to strengthen transparency and accountability in delivery of SDG 4 ³⁴ and invoke sanctions on members for non-compliance.

		Prevail on member states to scrupulously implement existing global, regional and local laws, policies and regulations on corruption and bad governance.
Weak presentation and dissemination of ECOWAS education strategy, implementation plans and engagement with civil society		Provide more clarity on ECOWAS education operations, including wider public dissemination of existing protocol and strategy and more open, transparent engagement with civil society. Make all relevant documentation available online through the ECOWAS website.
Rule of law		
CCJ rulings on human rights violations – lack of enforcement by member states	Nigeria All	Anti-corruption legal and regulatory instruments that have already been adopted by the Community and at national level need to be enforced. This should include more proactive enforcement of CCJ judgements at national level and strengthened political will in support of the CCJ.
Lack of adequate legal and administrative framework able to promote transparency and accountability in the education sector	All	Take more seriously its moral obligation to press member states to be more accountable. For example, champion the use of mapping exercises to identify overlaps and gaps between their anti-corruption legislation and legal commitments to education outcomes. Press member states to establish independent unit or agency to monitor compliance with anti-corruption requirements in the education sector, investigate conflicts of interest and administer sanctions. Promote legislation providing public access to information related to educational policies, programmes, budgets, expenditure, accounting and procurement records.
Weak compliance of public servants with codes of conduct (including sexual harassment and abuse of learners in exchange for grades)	All Liberia Niger	Promote the adoption and revision of codes of ethics and conduct for head teachers, lecturers, students, inspectors, education authority staff, teachers and ancillary staff, and enforcement of these codes. Enforce criminal sanctions contained in codes of conduct, where possible, when violations occur.
Public administration and systems		
Misallocation or diversion of public funds	All	Support member states to invest in improving finance and accounts systems to strengthen management and audit to improve accountability at national and district levels.
Corrupt teacher recruitment and management procedures including teacher absenteeism (ghost teachers, parallel systems of private tutorial teaching, or favouritism in recruitment)	All Senegal Ghana	Invest in innovations to address teacher recruitment and management systems. Establish well-defined, transparent procedures and standards for merit-based teacher recruitment and promotion, that do not permit favouritism.
Corruption in examinations procedures and accreditation	Ghana Senegal Niger	Develop a protocol to the Convention on the Mutual Recognition of Degrees, Diplomas, Certificates and other Qualifications, which outlines zero tolerance of corruption in efforts to recognise accreditation for the free movement of a skilled workforce throughout the region. Promote clear criteria for student admission tests and end-of-school examinations, administered by autonomous bodies.
Poor complaints and accountability mechanisms	Liberia	Actively promote and implement ECOWAS Whistleblower Protection Strategy (2017).

Transparency and accountability		
<p>Misallocation or diversion of public funds; poor expenditure tracking arrangements</p> <p>Corrupt procurement and tendering processes, inflation of enrolment numbers, imposition of unauthorised fees on learners at school level – including bribes for boarding rooms, scholarships or registration fees</p>	All	<p>Endorse Transparency International's indicators to strengthen transparency and accountability for measuring progress and impact against SDGs 4 and 16.³⁵</p> <p>Lobby member states to conduct integrity assessments as well as public expenditure tracking surveys in the field of education.</p> <p>Support member states to produce transparent public education data. There could be scope to partner with the UNESCO International Institute for Educational Planning on this, as part of its project on open school data.³⁶</p>
<p>No reference to transparency and accountability standards in ECOWAS education management information systems (EMIS) Assessment Framework</p>		<p>Develop and validate specific assessment of legal mandate and standards for corruption in education in the ECOWAS EMIS Assessment Framework.</p>
<p>Lack of publicly available key ECOWAS education strategies, directives, reports, etc.</p> <p>Weak engagement of ECOWAS with civil society groups working in education sector</p>		<p>Create space for civil society engagement in Directorate of Education activities. This should start by online publication of all key legal and strategic ECOWAS documents related to education and corruption and signing of a Memorandum of Understanding with the African Network Campaign for Education for All.</p>
Capacity development		
<p>Lack of transparency and accountability for education funds</p> <p>Poor financial management</p>	<p>Ghana Liberia All</p>	<p>Promote capacity-building initiatives for government officials to develop technical skills to improve financial management, eradicate corruption (e.g. appropriate audit procedures) and resist involvement in corrupt practices. There could be scope to partner with the UNESCO National Education Accounts (NEA) initiative on this, using the current NEA process in Senegal as a starting point.</p> <p>Promote and support capacity building at decentralised levels for community engagement in public expenditure tracking.</p> <p>Introduce anti-corruption education (about and in the education sector); conduct advocacy and awareness campaigns.</p>
<p>Inadequate school inspection and supervision procedures; teachers and school staff accepting bribes for grades, examinations or promotions</p>	<p>Ghana Senegal Liberia</p>	<p>Address capacity gaps through organisational development initiatives rolled out at regional and national levels. This will enable officials to resist corruption more effectively and develop the right skills, such as proper inspection and supervision procedures, to help reduce corruption at school and other levels. Governments must ensure stronger institutions with the capacity to deter, detect, resist and investigate corrupt practices in education.</p>

Annexe

Country	Anti-corruption legislation / institution
Ghana	<ul style="list-style-type: none"> • Anti-Money Laundering Act, 2008 (Act 749) • Anti-Money Laundering Regulations, 2011 (LI 1987) • Anti-Terrorism (Amendment) Act, 2012 (Act 842) • Anti-Terrorism Regulations, 2012 (L.I. 2181) • Audit Service Act, 2000 (Act 584) • Banking Act, 2004 (Act 673) • Credit Reporting Act, 2007, (Act 726)

	<ul style="list-style-type: none"> • Criminal Offences (Amendment) Act, 1993 (Act 458) • Commission on Human Rights and Administrative Justice Act, 1993 (Act 456) • Customs, Excise and Preventive Service (Management) Law, 1993 (PNDCCL 330) • Economic and Organised Crime Act, (2010), (Act 804) • Economic and Organised Crime Office (Operations) Regulations, 2012 (L.I. 2183) • Electronic Transaction Act, 2008 (Act 772) • Financial Administration Act, 2003 (Act 654) • Financial Administration (Amendment) Act, 2008 (Act 760) • Internal Audit Agency Act, 2003 (Act 658) • Internal Revenue Act, 2000 (Act 592) • National Identity Register Act, 2008 (Act 750) • Office of the Special Prosecutor Act, 2017 (Act 959) • Payment System Act, 2003 (Act 662) • Public Financial Management Act 2016 • Political Parties Act, 2000 (Act 574) • Public Office Holders (Declaration of Assets and Disqualification) Act, 1998 (Act 550) • Public Procurement Act, 2003 (Act 663) • Public Procurement Act, 2016 (Act 914) • Representation of the People Act, 1992 (PNDCCL 284) • Value Added Tax Act, 1998 (Act 546) • Whistleblower Act, 2006 (Act 720) • Education Act, 1961
Liberia	<ul style="list-style-type: none"> • Public Procurement and Concession Act 2006, followed by the establishment of the Public Procurement and Contracts Commission (PPCC) • Anti-Corruption Commission Act, 2008. Establishes Commission with mandate to investigate, prosecute and prevent corruption and to educate public on “ills of corruption and benefits of its eradication”. • Anti-Money Laundering Act (2012) • Public Financial Management Act (2009) • Internal Audit Agency Act (2013) • Freedom of Information Act (2010) • Code of Conduct for Public Officials (2014) • General Auditing Commission Act (1956) • Penal Code • Governance Commission Act (2007) • Liberia Extractives Industries Transparency Initiative Act (2009) • Education Reform Act (2011) • An Act to Establish the Independent Human Rights Commission 2005 • The Penal Code of 17 January 2006
Niger	<ul style="list-style-type: none"> • Penal Code; Law N° 61-27 <i>du 15 Juillet</i> 1961, articles 130 to 133 • Law on Unlawful Enrichment and for the Repression of Misappropriation of Public Funds (ordonnance n° 92-024 <i>du 18 Juin</i> 1992) • Public Procurement and Concessions Act 2005 • High Anti-Corruption Authority (<i>Haute Autorité de Lutte contre la Corruption et Infractions Assimilées</i>, 2011) • Anti-Money Laundering and Terrorist Financing Act, 2012 • Index / Regulation on the Fight against Examination Frauds • Financial Intelligence Unit (CENTIF) • Bureau of Information, Claims and Fight against Corruption and Bribery
Senegal	<ul style="list-style-type: none"> • National Commission Against Non-Transparency, Corruption and Embezzlement (<i>Commission Nationale de Lutte Contre la Non-Transparence, la Corruption et la Concussion</i> (CNLCC) • The Penal Code; Law 2003-35 of 24 November 2003 created the CNLCC • Procurement Code; Laws on Illicit Enrichment and Law on Money Laundering • National Office for the Fight against Corruption (<i>Office National de Lutte contre la Fraude et la Corruption</i>, 2012)

Notes

- ¹ UNESCO et al. *Education 2030. Incheon Declaration and Framework for Action for the implementation of Sustainable Development Goal 4*, Paragraph 108 (2015)
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- ³ M. Milovanovitch, *Fighting Corruption in Education, Call for sector integrity standards* (Washington: World Bank, 2013). Transparency International, *Global Corruption Report: Education* (Berlin: Transparency International, 2013)
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