GOVERNMENT OF PAPUA NEW GUINEA

A Five Year Plan to Support
The implementation of the
PNG Anti-Corruption
Strategy 2020 - 2030

NATIONAL
ANTI-CORRUPTION
PLAN OF ACTION
2020 - 2025

Building a Strong & Prosperous
Papua New Guinea

Anti-graft bill passes first vote

BY ISAAC NICHOLAS

THE Pangu Pati-led Government of Prime Minister James Marape carried an overwhelming first vote for the Commission Against Bill in Parliament. As a constitutional...

Parliament votes 98-0 in favour of anti-corruption law

MP/United Labour Party leader Sam Basil and Prime Minister/Pangu Pati leader James Marape (right) during the signing of an agreement to confirm their political alliance, flanked by members of their parties. ■ READ STORY ON PAGE 7

Vision

Establish a self-sustaining national system of Integrity in which corruption is eliminated and the principles of honesty and ethical conduct, effective application of the rule of law, fair play and openess and accountability and established are practiced in PNG

Long Term Goals

The NACPA 2020 -2025 aims to attain the long-term goals of the PNG NACPA 2020 - 2030 and therefore seek to:

1. Improve and intensify national efforts to tackle corruption through focused and collaborative actions across all sections of the PNG community involving all actors, including state actors, non-state actors, civil society and individual citizens.

2. Strenghten democracy and public accountability and the integrity and operational and management capacity of state public institutuions.

3. Strengthen the integrity and operability of private sector institutions and commercial entities.

4. Build a strong civil society that rejects, exposes and fights corruption.

5. Build and strenghten Papua New Guineas' trust and confidence in their government, state institututions and the private sector; and

6. Build and strengthen the international community's confidence on PNG, its government and its people

Primary Objectives

1. Provide an implementation framework for achieving the PNG NACS 2010 - 2030

2. Identify, prioritize and plan key measures to combat corruption in the short term.

3. Allocate Resources alligned with Priorities for Implementation.

4. To monitor progress of implementation of PNG NACS Key Action Areas.

Acronyms

COI	Commission on Inquiry
CRMF	Corruption Risks Management Framework
DJAG	Department of Justice & Attorney General
DOF	Department of Finance
DPM	Department of Personnel Management
ICAC	Independent Commission against Corruption
IICAC	Interim Independent Commission against Corruption
IU	Integrity Unit
KAA	Key Action Areas
NACA	National Anti-Corruption Alliance
NFACD	National Fraud and Anti-Corruption Directorate
NACPA	National Anti-Corruption Plan of Action
NACS	National Anti-Corruption Strategy 2010-2030
NACTF	National Anti-Corruption Taskforce
NEC	National Executive Council
OPP	Office of Public Prosecutor
PAF	Performance Agreement Framework
POC	Proceeds of Crime
PMNEC	Department of Prime Minister & National Executive Council
POW	Programme of Work
SCAD	Serious Corruption and Dishonesty

Prime Minister's Foreword

Today marks a significant step towards realizing our ambition in meaningfully combating corruption. It is an opportunity for our Institutions of State to work collaboratively to maximize our efforts with partners in the private sector, the civil society organizations, faith-based organizations and the population at large to fight corruption. Corruption is not in any way neither defining of our rich traditional heritage nor that of an individual's fight but one that demands a collaborative approach. It is also not limited to specific governance and administrative institutions but rather, bears on us all. International best practices are now highlighted under Papua New Guinea's National Anti-Corruption Plan of Action 2020-2025 (NACPA) that identifies and determines necessary actions under specific programs of work designed to fight corruption, which continues to negate positive progress and growth in Papua New Guinea.

The National Anti-Corruption Strategy 2010-2030 sets out a national framework that provides a clear pathway to tackle the dangers of corruption at all levels and sectors of society. The National Executive Council endorsed the NACPA in October of 2020 to implement the overarching National Anti-Corruption Strategy 2010-2030. It indicates national government's strong commitment to fight corruption in improving good governance. An Organic Law also has been approved by Cabinet and Parliament for the establishment of an Independent Commission Against Corruption (ICAC) for Papua New Guinea. Both sides of the House voted overwhelmingly in a landmark 96 – 0 vote, a demonstration and acknowledgement of our leaders' commitment in addressing corruption. Work is now being undertaken to see ICAC establishment in the near future.

Combating corruption if anything, aides in the delivery of much needed services to our people in health, education and infrastructure which in turn enables meaningful participation by our people in development and importantly, inclusion in our country's growth for a place we can truly be proud of. Combating corruption means giving hope; it brings ambition and trust that is achievable. Our systems and processes must not prejudice between those than can pay and those that cannot; our bureaucracy must be for the people.

I would also like to emphasize that the NACPA demands a collaborative approach between many of our accountability and governance bodies like the Royal Papua New Guinea Constabulary, Auditor General's Office, Office of the Public Prosecutor, including Education Institutions, Civil Society Organizations like Transparency International and Youth Groups. NACPA expounds beyond investigation and prosecution of corrupt conduct to embracing education in ethical behavior and conduct. We all have a moral obligation to ourselves and our children.

Our concerted effort in encouraging good governance will be testament of our intent and moral leadership in securing a better Papua New Guinea that we can be proud of. We must strive to leave this place better that we found it so that our future generations can enjoy the progress of our labour, and improve further for a country that we can be truly proud of. Our priorities are many for a developing democracy, Improved governance will enable a better future and must be one of our top priorities.

HON. JAMES MARAPE, MP
PRIME MINISTER

Minister's Foreword

In 2011, the Government endorsed the *Papua New Guinea National Anti-Corruption Strategy 2010 – 2030*, which was developed following a comprehensive review of the most appropriate ways to tackle corruption in PNG. The Government has been implementing that Strategy, through the *National Anti-Corruption Plan of Action (NACPA) 2012-2015*.

The Government unfortunately, did not produce the second Action Plan for the period between 2016-2019, which affected the implementation of Key Action Areas [KAAs] of the National Anti-Corruption Strategy by Agencies and Government Departments.

The NACPA 2012-2015 contained important Programmes of Work [POW] which were to be implemented, including big ticket items such as; the establishment of an Independent Commission Against Corruption [ICAC], Establishing Whistleblower and Freedom of Information Legislations, Creating a Special Prosecution Office on Corruption within the Office of the Public Prosecutor and Strengthening the Public Procurement System, to name a few.

The POW from the first Action Plan are still relevant to the current context of corruption in the country and also the ad hoc implementation of the majority of programmes paved the way for the programmes to be used again. The Government therefore consulted and agreed that the POWs contained in the first Action Plan be rolled over for inclusion with new POWs for implementation in the NACPA 2020-2025.

Despite the drawback of the 4-year gap between the first NACPA and the current one, I am delighted to say that the Government has already taken several important steps to address corruption. This includes strengthening Papua New Guinea's anti-money laundering system, to prevent our financial institutions being used to launder the proceeds of corruption and detect illicit funds in our financial system. This will also ensure that the moneys lost to corruption can be recovered by the State, and used for services for our people as intended. We have also been strengthening the investigative capacity of the police force and prosecution skills of the Office of the Public Prosecutor (OPP). The OPP has created the Serious Corruption and Dishonesty Unit, to focus on the prosecution of corruption related offences.

Laws were amended to strengthen the Public Procurement System as well as to significantly increase penalties for stealing and misappropriation involving significant amounts of money. White collar criminals who steal State moneys can now face life imprisonment. Our Whistleblower Legislation is now in force to give protection and enable people to come forward and report corrupt practices.

The Government is now focused on wider consultations with respective Departments and Agencies to take ownership and implement the NACPA 2020-2025. With better support of funding, technical expertise, overall leadership and coordination from the top bureaucracy, we can successfully achieve our plans under the NACPA 2020-2025.

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Hon. Davis Steven, LLB, MP
Minister for Justice & Attorney General

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Chapter 1.   Introduction

The National Government is implementing the second of a series of rolling implementing plans in the next five years. The National Anti-Corruption Plan of Action 2020-2025 (NACPA) has been endorsed by Cabinet in October 2020, which will be implemented by key Government Departments and Agencies. Its implementation will be overseeing by a Committee, entitled National Anti-Corruption Task Force (NACTF), which will be co-chaired by the Secretaries of both the Department of Prime Minister & NEC and the Department of Justice & Attorney-General, to provide policy and coordination roles at the Secretary and Heads of Agency levels, while deliberating on all policy matters relating to the implementation of the NACPA and in line with the overall National Anti-Corruption Strategy 2010-2030.

The National Government emphasizes on the importance of meaningfully implementing the identified Programme of Work (POW) of NACPA. The POW strengthens key program focuses on prevention, education and combating corruption in its implementation by key institutions of state. The NACPA provides an opportunity for all the parties involved to work collaboratively and to utilize the limited resources in funding and technical support, which is provided by the Government and the development partners to achieve the objectives of the NACPA in the next five years. The NACPA will be complemented by a Monitoring and Evaluation Framework, which will ensure that the implementation of NACPA is on track and on target, and that the results it seeks to produce on its programs, are delivered as planned.

* Photo (1). *Members of TWG on OLICAC and Interim ICAC office staff*

1.1 Overview of NACPA

The *National Anti-Corruption Plan of Action 2020-2025* (NACPA), is an Implementation Working Plan containing the operational details of the Program of Work (POW) for combating corruption in Papua New Guinea between 2020 and 2025. The POW contains <u>fifteen (15) individual</u> but mutually reinforcing anti-corruption program prioritized to be implemented individually or collectively by various stakeholders during this period.

NACPA is an implementing framework of the ***PNG National Anti-Corruption 2010-2030*** or the **PNG NACS**, and as such its primary role is to support PNG NACS achieve its Long-Term Goals and its Vision highlighted above. This Document is therefore to be read together with the PNG NACS 2010-2030.
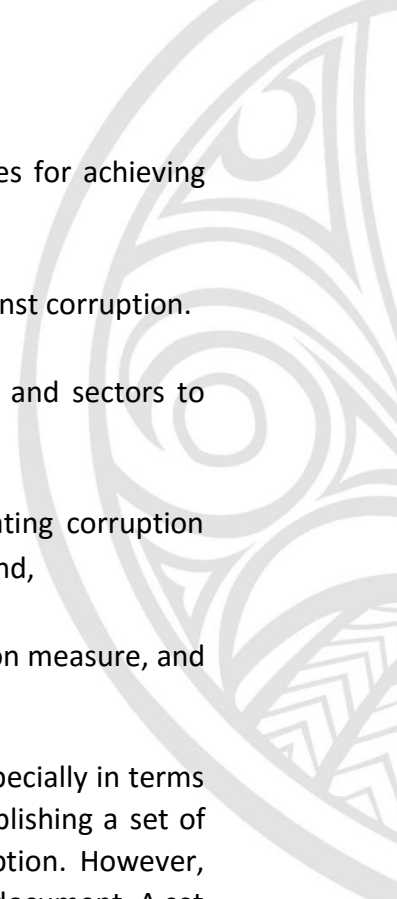
1.2 Basis for NACPA

The PNG National Anti-Corruption Strategy (PNG NACS) 2010-2030 was approved by the Government in 2011, after an arduous consultation and planning process involving both state and non-state actors. This came about after strong concerns from the public that too much is being said about eradicating corruption and too little is being done.

The PNG NACS was adopted by Parliament in November 2011 and sets in motion a series of significant changes in the way corruption is to be addressed in the country. These can be summarized as follows, that:

- The government is serious and will provide the leadership and the resources necessary to wage the campaign against corruption, both in the short and long term.

- The fight against corruption will be inclusive, incorporating the efforts of both state and non-state actors, and that the silo, piecemeal approach, in combating corruption is no longer appropriate and workable.

- That corruption will be addressed in a more realistic and systematic way using a national strategic framework acting both as a guide and a platform for rallying national efforts in the fight against corruption.

- That doing anything and everything about corruption won't work as it spreads efforts and resources too thin with no clear results; rather what is needed is to prioritize actions under the ambit of Key Action Areas (or priority areas) and channel anti-corruption efforts on these areas to get maximum results in a more realistic way.

The PNG NACS Strategy document identifies six critical enablers, defined in terms of the role of the PNG NACS, which the National Anti-Corruption Strategy must maintain in order to effectively fight against corruption. These are that, the PNG NACS must:

- Provide a comprehensive unified national directive for combating corruption.

- Provide a clear set of long-term anti-corruption goals and the strategies for achieving them.

- Provide a clear and concise direction to all stakeholders in their fight against corruption.

- Unify, harmonize and link different anti-corruption efforts at all levels and sectors to achieve common medium and long term national anti-corruption goals.

- Be the key platform for building a broad national coalition for combating corruption between state and non-state actors, civil society and the private sector and,

- Be used as a framework to coordinate, monitor and assess anti-corruption measure, and for improving such measures as and when necessary.

The PNG NACS 2010-2030 is already contributing to some of those roles, especially in terms of providing a unified national directive for combating corruption and establishing a set of common goals and Key Action Areas (KAAs) in PNG's fight against corruption. However, NACS alone is not sufficient to effectively fight corruption as it is a directive document. A set of carefully crafted implementation measures will need to be developed and deployed on the ground to implement the PNG NACS 2010-2030.

The PNG NACS 2010-2030 recognizes this and calls for implementation measures to be adopted in support for the PNG NACS. Part IV, Point 4.7 of the PNG NACS 2010-2030 strategy document calls for the deployment of a series of more detailed implementation plans containing specific program of action and the operational details within which they are going to be deployed in the medium term (preferably five years or less), to help support the implementation of PNG NACS 2010-2030. The development of this NACPA is a direct response to that.

1.3 NACPA's Strategic Alignment to Support NACs Vision and KAAs

The PNG NACS Strategy document identifies eight high priority areas or KAAs as crucial for creating a national system of integrity and the elimination of corruption. These KAAs are intractably linked to and hence are the preconditions upon which PNG's vision of a corruption-free country is to be achieved.

The PNG NACS unequivocally directs that PNG's anti-corruption efforts in the next 20 years be focused on these KAAs. As an implementation framework, NACPA POW is aligned to and directly supports the realization of eight KAAs in the PNG NACS as follows;

NACPA's Program of Work (POW) deploy anti-corruption measures around five (5) mutually reinforcing approaches outlined in the PNG NACS. These are:

1. *Prevention* – Preventive will measures through systemic institutional, legislative and administrative reforms, and public education and awareness raising aimed at building democracy and a strong civil society, and for an early and effective removal of incentives and/or compelling factors and opportunities that encourage and allow corruption to thrive;

2. *Combating* – Criminalization and law enforcement measures through an improvement in the legal and institutional arrangements for the detection, investigation and prosecution of corruption;

3. *International Cooperation* – International cooperation measures aimed at preventing or combating transnational crimes and corruption;

4. *Leadership and Coordination* - Leadership and coordination measures through building a broad national coalition against corruption and in providing leadership on anti-corruption efforts aimed at working towards a common vision and goals contained in the national PNG NACS; and

5. *Monitoring* – Monitoring measures through the regular and systematic measuring of the nature, causes and extent of corruption through reliable and verifiable data collection, analysis and coordination.

Chapter 2. Role and Purpose of NACPA

The NACPA 2020-2025 is the second of a series of implementation plans or NACPAs, deployed to combat corruption in the short term, leading up to 2030. In terms of design, NACPA 2020-2025 is the second ambitious plan yet after NACPA 2012-2015 and will continue to provide new ways of combating corruption in more realistic terms. Its adoption is unprecedented and demonstrates the strong agenda of the Marape/Steven Government to stamp out corruption.

The NACPA is an important subsidiary implementation plan of the NACS 2010-2030 and contains a set of practical measures aimed at combating corruption in a five-year period. It is a significant vehicle for achieving PNG's anti-corruption targets outlined in the PNG NACS 2010-2030.

Unlike the PNG NACS 2010-2030, the NACPA is not a strategy document. Rather, it is an implementation framework containing the tactical details of fifteen (15) specific measures to be implemented between 2020 and 2025 to combat corruption. NACPA is shaped and guided by the PNG NACS' Vision, Mission and the KAAs. It delivers based on, and according to, the parameters set by PNG NACS 2010-2030.

2.1 Role of NACPA

The primary role of NACPA is to lend support to and achieve PNG's long-term anti-corruption goals contained in the PNG NACS 2010-2030. The NACPA is an implementation vehicle containing a specific Program of Work (POW) for combating corruption by the Government between 2020 and 2025. As an action plan, NACPA subscribes to the SMART principle, both in its formulation and deployment. The Plan is therefore Specific, Measurable, Achievable, Realistic and Time-bound. By doing so, it allows Government to track and ascertain the extent in which it is fighting corruption, and the impact it is creating in the measures it employs under this implementation framework.

2.2 NACPA's Purpose

As an implementation framework, NACPA 2020-2025 serves several specific purposes. It:

▪ Sets a clear framework of linking strategy and action by putting in place a realistic program of work aimed at delivering on the national anti-corruption targets set by the PNG NACS 2010-2030.

▪ Sets a clear program of work consisting of targeted interventions that will be supported by Government and its partners and implemented immediately to combat corruption.

▪ Provides specific objectives and results (outputs) of such program thus giving effective direction on what is to be achieved.

▪ Provides specific measures/actions to be taken for each of the targeted program thus giving effective direction on what is to be achieved.

▪ Provides monitoring, reporting and evaluation mechanism for tracking progress, maintaining control during implementation and evaluating success and failure, and

▪ Provides a realistic basis for committing resources to fight against corruption in the identified program.

2.3 Lifespan of NACPA

This five (5) year NACPA will be succeeded by a series of NACPAs once it runs its full life cycle by the end of 2025. Each NACPA will run for a programmed period, preferably five years or less, until 2030 when the PNG NACS terminates.

Each NACPA may be different from its predecessor. Although set within the context of PNG NACS 2010-2030, and guided by the strategy's overall vision, long term goals and the KAAs, each NACPA's design will be shaped by the prevailing context of corruption in the country, the high priority needs of the country and the government in combating corruption, and the available resource envelope. All NACPAs are therefore dynamic and hence are subject to change.

Chapter 3. NACPA's Program of Work 2020-2025

There are fifteen (15) individual anti-corruption program, each with their specific measures, under the NACPA's POW that Government and its partners will deploy to achieve the eight (8) KAAs outlined above between 2020 and 2025. These are summarized as follows:
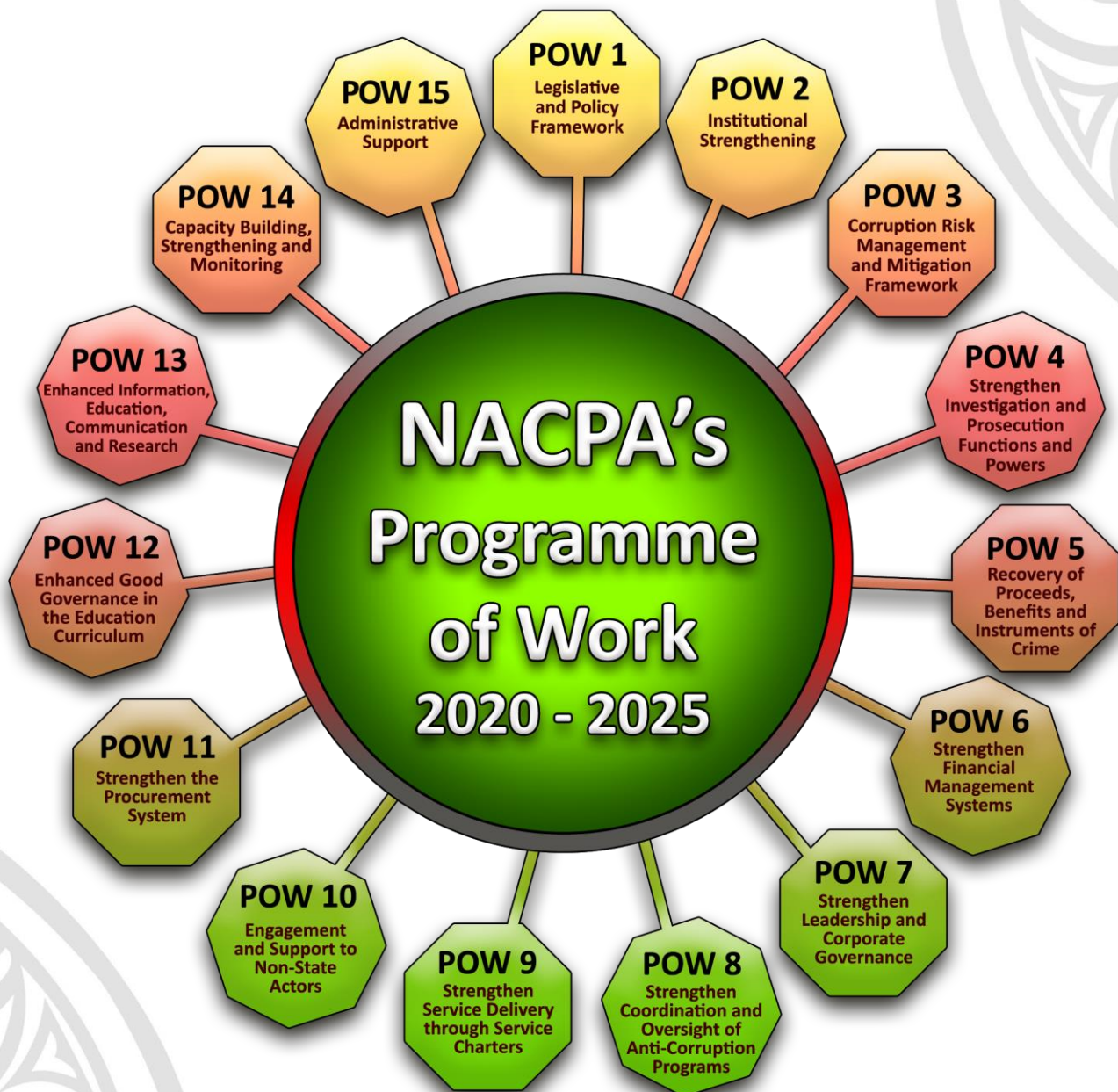
3.1 POW 1 – Legislative and Policy Framework

To provide an enabling environment for exposing corruption, the Government and the Non-State Actors have to take immediate steps to establish a number of legislative and policy framework. There are ten (10) legis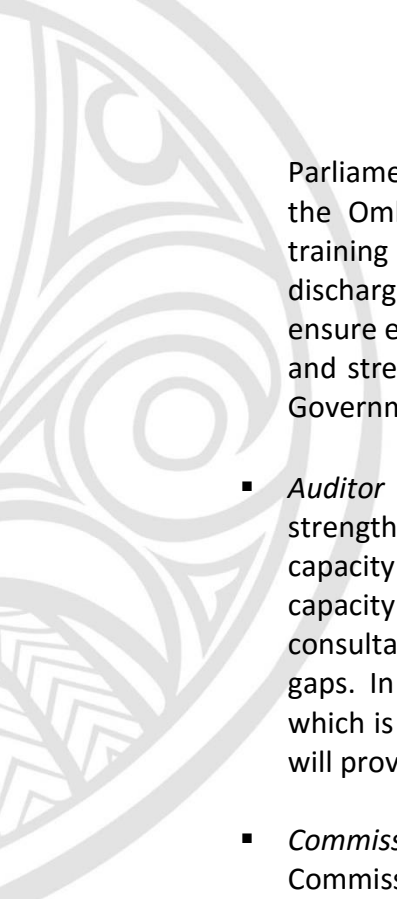lative and policy framework in the anti-corruption space that the Government has identified and prioritized to be developed and adopted during the time frame of this NACPA. They are as follows:

- *National Anti-Corruption Plan of Action 2020-2025.* The Government through the Department of Prime Minister & NEC and the Department of Justice & Attorney General as co-chairs on anti-corruption matters in the country will take immediate steps to develop the second National Anti-Corruption Plan of Action 2020-2025 in compliance with Part IV of the PNG NACS. This will be done in full consultation with other Government agencies and non-state actors. This implementation framework will provide the guide to all stakeholders involved in the anti-corruption space on how we can collectively address corruption risks in the country;

- *Whistle-blower Legislation and its Regulation.* The legislation was passed unanimously in the February 2020 Parliament Sitting by all the members who voted in favour of the Bill. The Act aims to provide protection for those in the public sector to report corrupt practices. It intends to provide procedures for employees to report suspected improprieties in the workplace and protect employees who make protected disclosures from occupational detriment. The Act will also provide remedies to employees who suffer occupational detriment having made protected disclosures. The proposed ICAC Legislation (Part IV – Investigating Corrupt Conduct) also contains reporting of corrupt conduct whether or not a public official, and provides procedures and avenues to protect whistle-blowers, and progresses or refers reports to other agencies it authorizes. The aim of this legislation will be to ensure that citizens are protected from reprisals and other retaliatory actions upon making complaints or reporting on corruption;

- *Organic Law on the Independent Commission against Corruption (ICAC).* The Government since 2007 had taken steps to establish the enabling legislation for the establishment of an ICAC. In 2019, the Government revisited the proposed ICAC Legislation and during the February 2020 Parliament Sitting, introduced the Organic Law on ICAC on the floor of Parliament. In May 2020 the Organic Law went through its second reading with 86 members of Parliament voting for it against nil. This overwhelming support demonstrated the leadership commitment to a better Papua New Guinea. The 3rd Reading of this piece of legislation is scheduled for August 2020 and once passed by Parliament the next step going forward is to formulate specific regulations for ease of implementation and clarity between the ICAC, key Anti-corruption and Government agencies to complement well, each other's mandated functions and responsibilities. When established, the ICAC will provide wide powers and functions to act against corruption and in doing so, strengthen and create strong partnerships with existing anti-corruption agencies.

- *Freedom of Information Legislation* - Dealings and decisions of public authorities will be subject to scrutiny and public officials held to account if citizens have access to

Photo (3). *Sir Peter Ipatas, Chairman of Parliamentary Committee on Constitutional Laws and Acts of Parliament*

- government information without undue hindrance. Public access to government information is an important deterrent against corruption and is a key foundation for the operation of an open and free press reporting on unscrupulous and corrupt practices and dealings. In PNG, unfortunately, government information is jealously guarded. In recognizing this, Government will take immediate steps to introduce a *Freedom of Information Act* or *Public Information Access Act.* The aim of the Act will be to provide unparalleled access to government information by the citizenry upon request and using properly established procedures. The Department of Communication & Information (DCI) in collaboration with the Department of National Planning & Monitoring, which houses the Open Government Partnerships Secretariat (OGP), will play a key role in putting together a workable program for the course of this action plan;

- *Ombudsman Commission Legislations* – The Ombudsman Commission has two (2) main function which is to enforce the leadership code and to deal with administrative non-compliance issues. There are four (4) legislations that the Ombudsman Commission intends to amend during this NACPA period which includes one, Constitutional Amendment, Two (2) Organic Laws and one (1) Act of

Parliament. The review of these legislations is priority to strengthen the powers of the Ombudsman Commission and ensure appropriate personnel, resources and training are provided to ensure the Ombudsman Commission can effectively discharge its mandate. The review will also strengthen the Leadership Code to ensure effective investigation, prosecution and stronger penalties for corrupt leaders and strengthen the non-compliance issues affecting the administrative functions of Government agencies.

- *Auditor General's Legislation-* Government has to take immediately steps to strengthen the capacity of audit and accountability bodies by putting in place a capacity building program aimed at strengthening the competency and operational capacity of such bodies. This program will be established based on extensive consultation and on audit of such bodies with the view of addressing critical capacity gaps. In this connection, a specific program modality will be framed, the aim of which is to establish the framework and the tactical details upon which government will provide assistance to audit and accountability institutions.

- *Commission of Inquiries Legislation* – The Government plans to review the Commission of Inquiry (COI) legislative framework aimed at giving more powers to the COI to not only facilitate the conduct of inquiries but also to do more with the recommendations that come out of those CoIs. It was revealed during the stakeholder consultation on the development of this NACPA that so much funding is invested in CoIs yet nothing much comes out of those recommendations due to reasons of limited powers of the CoI. There's a push from society for CoI or other appropriate mechanism be given powers to do more with the recommendations;

- *Non-State Actors Engagement Framework* – Government is keen to see non-state actors develop a non-state actors engagement framework with the Government on where they can come in and assist the Government in eradicating corruption in the country. The Non -State Actors Engagement Framework will also serve as a platform for civil society engagement with Government;

- *State- Civil Society Partnership Policy* – This policy aims to set out areas of partnership arrangements amongst civil society organizations and the Government for greater service delivery to the populace. This policy has been subjected to various consultation processes where input from various stakeholders have been incorporated. The next stage is to be facilitated through the appropriate decision-making processes within Government and fully implementation by Government and civil society organizations; and

- *National Fraud and Anti-Corruption Directorate (NFCAD) Legislative Framework* – The NFCAD far too long has been faced with limited resources to carry out their roles and responsibilities. It was revealed in the stakeholder consultation that NFCAD is not only responsible for investigating and prosecuting anti-corruption cases but is also largely responsible for the recovery of proceeds of crime as well. Due to ongoing scarcity of resources, they are mostly focused on anti-corruption cases. This would mean looking at the *Proceeds of Crime Act* and amending it to strengthen the Government's recovery of assets efforts. The position is to also remove the recovery

of assets powers from the Police and have it transferred to other relevant Government agencies appropriately placed with such responsibilities such as the Sheriff or Department of Justice & Attorney General's Office.

3.2 POW 2 – Institutional Strengthening

This NACPA has identified a number of key anti-corruption bodies whose main roles and responsibilities is upholding good governance to be institutions that needs establishment, support and strengthening during this period. Amongst others below are five (5) of those priority institutions;

- *Strengthen the Office of Public Prosecutor's Serious Corruption and Dishonesty Unit and Proceeds of Crime Unit* - Numerous Commissions of Inquiry (COIs) and official investigations have not materialized into prosecuting offenders. Instead, findings have collected dust and remain outstanding. Most Papua New Guineans are aggrieved by this and are highly skeptical about the Government in its ability to stem corruption. A key problem is that findings of such investigative and prosecution bodies are not readily admissible in court and that this problem is compounded by the fact that prosecution authorities are incapacitated to prepare the findings for trial and successful prosecution. Recognizing this, the Government has established the Serious Corruption and Dishonesty Unit in the Office of Public Prosecutor (OPP). The SCAD Unit's primary role is to prosecute corruption and dishonesty cases stemming from COIs and special investigations or to assist police prosecutions on corruption cases. Although depending on the prosecution powers of the ICAC, SCAD Unit may also support or work collaboratively with the ICAC in prosecuting corruption cases. The other unit within the OPP is the Proceeds of Crime Unit (POCA Unit). Since 2005 when the *Proceeds of Crime Act* 2005 was enacted the OPP through its POCA Unit has only successfully recovered proceeds from one case which was not even through the criminal process but rather through a civil process. One of the main hindrances to successful recovery of assets derived from proceeds of crime was the inability of the judiciary to make decisions due to lack of capacity; Strengthening the POCA unit will go a long way in recovering proceeds, instruments and benefits of crime.

- *Establishment of an Independent Commission against Corruption* - Given the urgent and immediate need to tackle public corruption, Government has taken immediate steps to establish an Independent Commission Against Corruption (ICAC) to combat corruption. In principle, the ICAC will be at the forefront of fighting corruption in the public domain with no hindrance or undue influence. It will be independent and its powers and functions mandated and determined by law. The ICAC will have wide investigative and prosecution powers and can act on its own accord. It will maintain and enforce the integrity of public authorities, public officials and departmental heads by investigating, exposing and preventing corruption. It will promulgate and promote ethical standards and raise awareness on corruption across all government instrumentalities. It will maintain the integrity of Government systems and processes by ensuring that their operability gives effect to good governance and ethical and effective public administration. The passage of the 2014 Constitutional Amendment had legally enabled the establishment of an Organic Law on the Independent Commission Against Corruption to create ICAC for Papua

New Guinea. In 2018 the Government through a National Executive Council (NEC) decision established an Interim Independent Commission against Corruption (IICAC) Office and appointment of an Interim Chairman to purposely attend to former Investigations Task Force Sweep files and facilitate the development of its organizational and management structures.

- *Strengthens Audit and Accountability Institutions* - Government during the NACPA period will take immediately steps to strengthen the capacity of audit and accountability bodies by putting in place a capacity building program aimed at strengthening the competency and operational capacity of such bodies. This program will be established based on extensive consultation and on audit of such bodies with the view of addressing critical capacity gaps. In this connection, a specific program modality will be framed, the aim of which is to establish the framework and the tactical details upon which Government will provide assistance to audit and accountability institutions.

- *Strengthens the Royal Papua New Guinea Constabulary's National Fraud & Anti-Corruption Directorate* – The Government is committed to strengthening the impartiality and independence of operations of the National Fraud & Anti-Corruption Directorate (NFACD, whilst at the same time maintaining its reporting lines to the Police Commissioner. The intention is to allow the Directorate to operate without undue influence [for example, direction to discontinue investigations into high profile cases] but at the same time being accountable to the Police Commissioner. Strengthen the Financial Investigation Unit [FIU] with the NFACD to pursue financial investigations and criminal assets investigations with a view to recovering proceeds, instruments and benefits of crime.

- *Strengthen the Powers and Capacity of Ombudsman Commission in Enforcing the Leadership Code (OLDRL) and Administrative Complaints Investigation* -The Ombudsman Commission has two (2) primary mandates. First is enforcing the Leadership Code and second is the traditional administrative complaints investigation. Often the public is focused on its first mandate and forget that they have the second mandate which is just as important as the first mandate. During this NACPA period the Government's focus will be on strengthening the powers of the Ombudsman Commission and ensuring appropriate personnel, resources and training are provided to effectively discharge its two mandates. Strengthen the Office to ensure effective investigation, prosecution and stronger penalties for corrupt leaders as well as addressing issues of non-compliance within established institutions.

3.3 POW 3 – Corruption Risk Management and Mitigation Framework

Government has recognized corruption to be the number one and most critical risk to its operations and will take immediate steps to combat this risk before it materializes. Unlike the private sector, most public agencies do not have any risk management strategy to avert corruption and hence maintain the integrity of their operating systems and ensure effective corporate governance. As a consequence, they are vulnerable to, and are overly exposed to corruption. We have seen this vulnerability and over-exposure materializing over and over

again by the frequency of corruption in our public institutions involving public officials and beneficiaries of Government contracts.

In recognizing this, Government will take immediate steps to make it mandatory for heads of public agencies to recognize corruption as a primary risk and to ensure that all public instrumentalities have a corruption risk management and aversion/mitigation strategy focusing on corruption as the number one risk. This strategy will form part of the overall corporate strategy of public organizations.

Heads of public agencies will be required by Government to constantly assess and manage their operations using that strategy, identify and constantly assess and manage their operations using that strategy, identify and constantly monitor weak and vulnerable areas, and take evasive/corrective action prior to corruption materializing. Government will take immediate steps to begin implementing this strategy first with vulnerable departments. Vulnerable departments are defined by Government as those highly susceptible to corruption because of the nature of their task. Departments handling large sums of money either as trustee or payer are prime examples of vulnerable departments.

3.4 POW 4 – Strengthen Investigation and Prosecution Functions and Powers

Recognizing the ongoing need to take urgent measures to combat endemic and systemic corruption, the Government will take immediate steps to intensify its efforts to use short-term special investigation task forces to probe, expose and prosecute those involved in corruption in areas warranting immediate action. Government has already begun this process but will increase the number of review and investigative task forces, and commit more resources to deal with outstanding corruption matters. A part of this action will involve combining different enforcement agencies of Government to work collaboratively to ensure successful prosecution of offenders. In the long term, special investigative taskforces will work in unison with the ICAC and the OPP, for purposes of effective prosecution and criminalization of offenders.

The other area of priority under this POW is also facilitation of implementation of Commission of Inquiry (COI) Report Recommendations. So much funding has been invested over the years in these inquiries but proper outcome has come out of those inquiries. The immediate steps during this NACPA period is for the COI to work with relevant Government agencies to look at these inquiries and work to facilitate the implementation of these COI recommendations.

3.5 POW 5 – Recovery of Proceeds, Benefits and Instruments of Crime

The Government in appreciating the work of fairly good anti-corruption laws and institutions by developing country standards sees the Leadership Code as perhaps one of the most important legislations that has helped in containing corruption at the top echelons of Government and politics. The Code defines monitoring and disclosure of assets by leaders, their conduct and the rules and registries concerning gifts and hospitalities. It requires leaders to provide an annual return to the Ombudsman Commission stating their wealth and sources of their income. There are other legislations, such as the *Public Finance Management Act (*PFMA), the *Audit Act* and the *Public Service Management Act* (PSMA), which regulate the conduct of public officials and provide measures to prevent conflict of

interest in public offices. Parliament adopted the *Proceeds of Crime Act* 2005 which seeks to, among others, prevent money laundering, ensure the forfeiture of property used in connection with the commission of offences, and deprive persons of, and benefits derived from, the commission of offences. The Office of the Public Prosecutor's specialist POC Unit whose primary role is to institute legal proceedings to recover proceeds of crime, instruments and benefits of crime. Its role is crucial to disable criminal network or syndicates by removing the money from criminals so they no longer have the influence or resources to commit further criminal offences. All proceeds of crime are forfeited into the State's Consolidated Revenue Fund.

Photo (4). *Mr. Raphael Luman (2nd from left) State Prosecutor, Proceeds of Crime Division*

3.6 POW 6 – Strengthen Financial Management Systems

There are public agencies whose exposure to corruption is exacerbated by the responsibilities they assume, for example, in dealing with large sums of money. And yet we know that their core mandate does not allow them to carry out such functions or, that their systems and processes are not designed to carry out such functions. By giving them, or allowing them to carry on such functions, we set them up to fail and be corrupt. There are public authorities and officials other than the Finance Department that have become banking and financial institutions overnight, handling large sums of public money and making payments to third parties. In so doing and without a proper and effective risk management framework and being ill suited to carry out such functions, they have unnecessarily exposed themselves to corruption. For some of these organizations, there is a total lack of financial accountability to Government and financial abuse. In recognizing this challenge, Government during has identified a number of priority areas that it will support to strengthen our financial management systems. Amongst others the Government intends to focus its attention on the following;

- Stream lining and relocating financial disbursement functions;
- Strengthen Provincial and Local Level Government Financial Management systems

- Support any budget tracking programs; and
- Support any case management system.

Also in recognizing the stated problems, Government will take immediate steps to review the role of these organizations with the intent to take away their trustee roles and hence expenditure disbursement functions to third parties and adopt alternative disbursement systems that are prudent, open and accountable in order to safeguard public money and prevent theft, abuse and wastage. If need be, Government will resort to the open market by contracting out the disbursement functions to capable providers.

suitable or permanent body (i.e. ICAC) to be responsible for coordinating and providing overall direction and oversight on the PNG NACS implementation in the medium to long term.

3.7 POW 7 – Strengthen Leadership and Corporate Governance

"It's very important that anyone who presents themselves as a leader and wants to be a leader will speak like a leader. That means speaking with integrity. It means speaking truth." Kamala Harris

The Government has recognized that poor corporate governance and leadership sow seeds of corruption and provide an enabling environment for corruption to thrive. The Government will take immediate steps to review and introduce a comprehensive *Performance Agreement Framework* in order to secure prudent and effective management and leadership from heads of public agencies/instrumentalities. The Chief Secretary to Government will be instructed to examine ways to incorporate *Performance Agreement* as a statutory requirement in law. Current contract of employment are loosely organized and do not foster good corporate governance practice. This will change. Performance agreements

Photo (5). Caption

will form part of the *Contract of Employment* and will be one of the primary tools for securing greater accountability, high level of performance and better corporate governance from heads of public instrumentalities. Statutory compliance requirements such as Section 5 of the *Public Finance Management Act* and relevant other provisions, statutory compliance requirements of the *Public Services Management Act* and, the accountability and compliance requirements of the *Provincial Administrators* under *s.112* of the *Organic Law on Provincial and Local Level Governments* will form part of contractual obligations covered in Performance Agreements.

3.8 POW 8 – Strengthen Coordination and Oversight of Anti-Corruption Programs

The Government through the Office of the Chief Secretary to Government and the Secretary for the Department of Justice & Attorney General (DJAG) will oversee the implementation and coordination of PNG NACS and NACPA 2020-2025 at the centre of Government. Given the urgent need for leadership at the national level, and in order to spearhead the collective fight against corruption across the broad spectrum of Government, civil society and the private sector, the Integrity Unit (IU) with the Department of Prime Minister & NEC will oversee, coordinate and report to the Chief Secretary. This unit will be transitional and short term, responsible for providing initial leadership on the PNG NACS and putting in place the necessary preparatory arrangements for the PNG NACS's

full implementation and coordination together with DJAG. Under the direction of the Chief Secretary, the IU in partnership with DJAG and key Government and Anti-Corruption agencies will be responsible for overseeing and coordinating the immediate measures taken to combat corruption. Once ICAC is fully established it will take over the IU and DJAG responsibilities of overseeing implementation of anti-corruption efforts in the country. The Government will institute measures to strengthen NEC's advisory and coordination mechanisms to ensure accountability at the highest levels. The Government has identified the need to strengthen the integrity of the National Executive Council [NEC] to prevent it from policy capture. The Government will institute measures to strengthen NEC's oversight role on the performance of the public service machinery and other state institutions, including the performance and accountability of departmental heads.

3.9 POW 9 – Strengthen Service Delivery through Service Charters

Service Charters are an important measure of budget against actual service delivery for services and projects that are funded by the National Government. It is an important governance mechanism tool to track how budgets have been expended and whether they have been expended on items budgeted for. It is facilitated by independent evaluators that tries to add value to the Government processes in assessing Government expenditure implementation and provides a check and balance to all parties concerned. This concept has

Photo (6). *Mr. Chris Kenya, (left) Team Leader for Service Charter Implemented through village courts system*

been implemented to track the Functional Grants budgeted to Provincial Administrations for village courts and land mediation functions in two Provinces of the country. This program will be prioritized in five Provinces of the country.

3.10   POW 10 – Engagement and Support to Non-State Actors

"I suppose leadership at one time means muscles, but today it means getting along with people." Mahatma Gandi

The Government will immediately take steps to constructively engage with civil society watchdog groups to garner support and establish a 'coalition of partners' to fight corruption. Transparency International and the Consultative Implementation and Monitoring Council (CIMC) as the Civil Society and inter-Government organization will immediately take steps to undertake consultations with such groups with the view to establish a program of mutual cooperation and support to civil society groups. A specific program will set the framework for joint cooperation and mutual assistance and will define the manner in which Government will support civil society groups' in their fight against corruption. This is the entry point for non-state actors to actively engage with Government to implement anti-corruption initiatives in the country.

3.11   POW 11 – Strengthen the Procurement System

The Government in recognizing the importance of service delivery to the people through huge government projects and the importance that the Public Procurement System plays in channeling large budgetary finances, will institute regular and consistent administrative and financial audits into the Public Procurement System with the intent in improving and promoting corporate governance. That includes audits into the newly established National Procurement Commission, audits into internal Evaluation and Procurement Committees, and processes of awarding contracts. In terms of support, the introduction of the Freedom of Information Legislation will add weight to strengthening public procurement as decisions and actions of public officials on tender, award of contract and payment of contracts maybe subject and open for public access and for greater government scrutiny. This will allow for more transparency and increased accountability. Additionally, the NFAC Unit of OPP will provide support to prosecute and criminalize people who corrupt the procurement system.

3.12   POW 12 – Enhanced Good Governance in the Education Curriculum

Government will incorporate important anti-corruption learning themes and components into the formal education curriculum of the country, beginning with primary education learning through to the higher secondary level and tertiary levels of the country. This program will ensure that primary and secondary schools curricula will be revised to promote the culture of integrity and complement existing learning themes that the formal education system currently provides. A young population educated about corruption is likely to be more vigilant about corruption, actively participate in anti-corruption efforts, and will speak out against corruption. Education institutions and communities of the country will play an important role as key points of awareness and education on corruption. The actions that will likely take place will be to revise the primary and secondary schools curricula to include civic

education activities which will promote a culture of integrity and zero-tolerance of corruption. Another key measure will be to incorporate education initiatives to promote integrity and tackle corruption as part of teacher training. The Education Department and key stakeholders to provide a workable program of work to be implemented.

3.13   POW 13 – Enhanced Information, Education, Communication and Research

Government will oversee that anti-corruption messages are communicated widely to the population. Information and Education Materials needs to be developed and consistently conveyed as widely as possible on the rights and social obligations of the people. This is to ensure that that those persons placed in position of authority are not succumb to temptations that can undermine the integrity of the office they hold as well as their personal integrity. The population is also empowered to report any suspicious dealings that may compromise the integrity of a public office or public official. Research will need to be undertaken in the country in the anti-corruption space to assist inform the Government in its decision making processes and good governance practices.

3.14   POW 14 – Capacity Building, Strengthening and Monitoring

Government is keen on building the capacity of ant-corruption community of practitioners over the next five years. This move is to crucial to build the capacity of the people that will build the systems that have been recently created through respective legislations and policy framework which amongst others include the *National Procurement Act, the Whistle Blower Legislation and the Organic Law on the Independent Commission against Corruption*. Capacity building will require both in country and regional programs that are aimed to close the capacity gaps in this space and build a network of practitioners that will work to address anti-corruption issues in the country.

3.15   POW 15–Administrative Support

Implementation of any policy framework is just as important as its initial creation. The country will not know if the policy framework is effective if there is no proper administrative

Photo (9). *Hon. Chris Haiveta, MP, Governor of Gulf (sitting middle), Thomas Eluh, MBE, Chairman of Interim ICAC Office (sitting right) and temporary staff of IICAC office*

support for its full implementation. The Government aims to fully support the implementation of the activities under this NACPA by the different agencies. Support could come in the form of Equipment, manpower, infrastructure amongst others.

Chapter 4.   Implementation, Reporting, Monitoring and Evaluation

NACPA 2020-2025 will be implemented by various organizations. It also includes an entry point for Non-State actors to be actively involved during this period in implementing its activities within its space aligned with the PNG NACS KAAs. A detailed Monitoring Framework has been developed to track progress and provide report back to Government on its implementation status. Each organization will be required to develop each specific work plans annually over the period of NACPA under relevant POW sanctioned by the oversight organizations to ensure that the fifteen (15) priority POWs identified for implementation during this period are achieved. The Reporting, Monitoring and Evaluation Framework will be used to generate information to measure performances, generate data to be used to modify existing approaches to create impact and ensure continuous improvement is seen in the anti-corruption space.

Appendix – Monitoring and Evaluation Framework

Table 1: NATIONAL ANTI-CORRUPTION PLAN of ACTION (NACPA) PROGRAM LOGIC

VISION: Building a Strong and Prosperous Papua New Guinea				
IMPACT MEASURES Page 22	**THEMATIC AREA 1: ENHANCED INSTITUTIONAL FRAMEWORKS**	**THEMATIC AREA 2: ENHANCED INVESTIGATION, PROSECUTION AND ASSET RECOVERY**	**THEMATIC AREA 3: STRENGTHENED LEADERSHIP AND CORPORATE GOVERNANCE**	**THEMATIC AREA 4: IMPROVED TRANSPARENCY AND ACCOUNTABILITY – PREVENTION AND MONITORING**
GOALS **(NACs - KAAs)**	**KAA3: Build and Maintain Effective People Management System**	**KAA6: Strengthen Compliance and Enforcement** **KAA4: Strengthen the Integrity of the Public Finance Management System**	**KAA1: Promote and Strengthen Honest Leadership** **KAA8: Strengthen Coordination and Partnership**	**KAA2: Strengthen Transparency and Public Exposure of Corruption** **KAA 5: Strengthen Accountability and Oversight** **KAA7: Strengthen Public Awareness and Education**
OUTCOMES **(POWs)**	**POW 1 – Enhanced Legislative & Policy Framework** **POW 2 – Institutional Strengthening** **POW 3 – Corruption Risk Management and Mitigation Framework** **POW 14 – Capacity Building, Strengthening and Monitoring** **POW 15 – Administrative Support**	**POW 4 – Strengthen Investigation and Prosecution Functions/Powers** **POW 5 – Recovery of Proceeds, Benefits and Instruments of Crime** **POW 6 – Strengthen Financial Management Systems** **POW 11: Strengthen Public Procurement System**	**POW 7 – Strengthen Leadership and Corporate Governance** **POW 8 – Strengthened Coordination and Oversight of Anti-Corruption Programs** **POW 9 – Strengthened Service Delivery through Service Charters**	**POW 10 -Engagement and support to Non-State Actors** **POW 12: Enhanced Good Governance in the Education Curriculum** **POW 13 –Information, Education, Communication and Research**
OUTPUTS **(Development**	**POW 1 - Enhanced Legislative & Policy Framework**	**POW 4 - Strengthen Investigation and Prosecution Functions/Powers**	**POW 7- Strengthen Leadership and Corporate Governance**	**POW 10- Engagement and support to Non-State Actors**

	VISION: Building a Strong and Prosperous Papua New Guinea			
IMPACT MEASURES	THEMATIC AREA 1: ENHANCED INSTITUTIONAL FRAMEWORKS	THEMATIC AREA 2: ENHANCED INVESTIGATION, PROSECUTION AND ASSET RECOVERY	THEMATIC AREA 3: STRENGTHENED LEADERSHIP AND CORPORATE GOVERNANCE	THEMATIC AREA 4: IMPROVED TRANSPARENCY AND ACCOUNTABILITY – PREVENTION AND MONITORING

Agendas)
 	
OUTPUTS (Development Agendas)
	- Formulation of National Anti-Corruption Plan of Action (NACPA 2020-2025) -Facilitate ICAC Organic Law & Subsidiary Legislative and Policy Framework
	-- Implement Whistle-Blower Legislation and Facilitate Enactment of its Regulation
	- Develop Freedom of Information Legislation
	- Develop/Facilitate 4x legislative framework for amendment for the Ombudsman Commission
	- Review Auditor General Act
	- Review Commission of Inquiries (CoI) Legislation
	- Facilitate the establishment of Non-State Actors Engagement Framework
	- Facilitate State-CSO Partnership Policy
	- Review National Fraud and Anti-Corruption Directorate (NFCAD)
	
	POW 2 – Institutional Strengthening
	• Strengthen Office of Public Prosecutor's Serious corruption and dishonesty and Proceeds of Crime Units.
	• Establishment of the Independent
		- Increased use of Special Investigative Task Forces
		- Facilitate/Implement Commission of Inquiry (COI) Report Recommendations
		
		POW 5- Recovery of Proceeds, Benefits and Instruments of Crime
		
		- Establish Recovery of Proceeds, benefits and Instruments of Crime Framework
		
		POW 6 - Strengthen Financial Management Systems
		
		• Stream lining and relocating financial disbursement functions
		• Provincial and Local Level Government Financial Management Systems (Central, Enga, SHP, EHP, Morobe, ENB),
		• Budget Tracking Programs
		• Management System
			- Establish Performance Based Contracts of Employment
			- Institutionalise Performance Management Systems (CEOs Performance) – Electronic Based Performance (DPM KRA)
			- Enforce Code of Business Ethics and Conduct in Public Service
			  • Enforcement of the Public Service Code of Conduct –
			  • Engender GESI Policy as whole of government public service policy
			- Business Processes for improved performance of agencies in public service
			- Training and Capacity Building-Competency Based Training on Leadership
			- Internal process (General Order-GO15 on Discipline – need to strengthen enforcement
			- Legal Institutional Framework to guide operational areas of agency functions- Corporate Plans –
			  • Public Service Training – (HRD Strategic Plan) Public sector Work force Planning
			  • Entry-competitive employer (need for certification and
				• Formation of Technical Working group
				• Identify Non-State Actors (FBOs, CSO, Private Sector etc)
				• Design Stakeholder Engagement Framework (participation and activities – Monitoring framework
				• Consultation with non-state actors (validate programs)
				• NSA Engagement plan
				• Program of Support
				• Resource Envelope
				• Implementation of Activities (NSA Engagement Mechanisms)
				
				POW 13 - Information, Education, Communication and Research
				
				• Awareness programs
				• Research Programs
				• Educational Programs
				Printing Materials, Publications and Reports, Journals, Pamphlets,

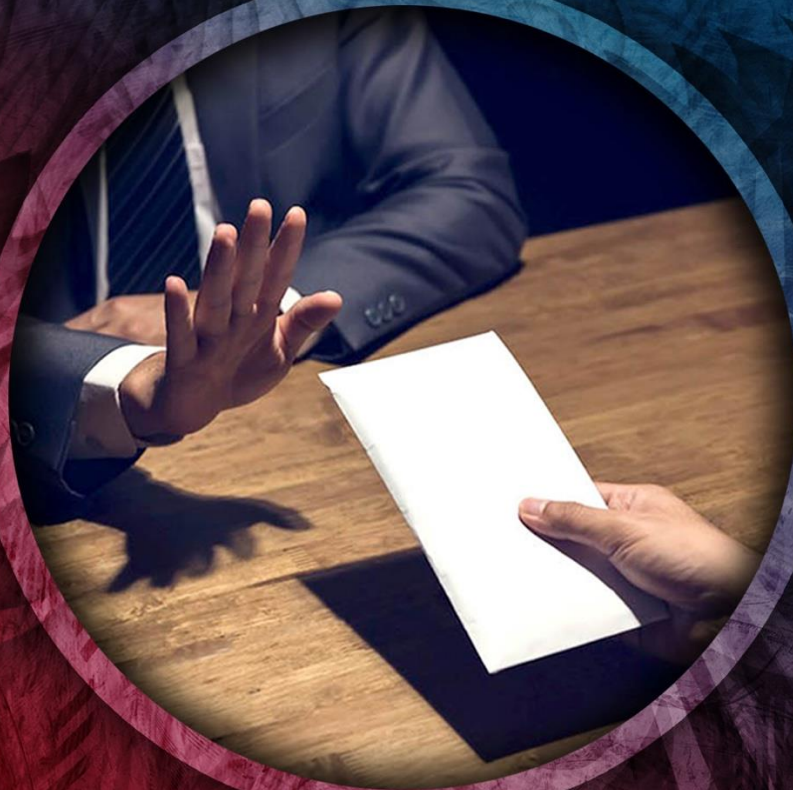|			
VISION: Building a Strong and Prosperous Papua New Guinea			
IMPACT MEASURES	**THEMATIC AREA 1: ENHANCED INSTITUTIONAL FRAMEWORKS**	**THEMATIC AREA 2: ENHANCED INVESTIGATION, PROSECUTION AND ASSET RECOVERY**	**THEMATIC AREA 3: STRENGTHENED LEADERSHIP AND CORPORATE GOVERNANCE**	**THEMATIC AREA 4: IMPROVED TRANSPARENCY AND ACCOUNTABILITY – PREVENTION AND MONITORING**
OUTPUTS (Development Agendas)	Commission Against Corruption • Strengthen Audit and Accountability Institutions • Strengthen the RPNGC National Fraud & Anti-Corruption Directorate (NFACD) • Strengthen the Powers and Capacity of Ombudsman Commission in Enforcing the Leadership Code (OLDRL) and Administrative Complaints Investigation		qualifications) • Maintenance (Capacity Building • Exit – Succession Planning - Motivational Factors – Standard Terms and Condition - Regular Monitoring of Staff Performance (Staff Performance Appraisal)	
	POW 3 - Corruption Risk Management and Mitigation Framework • Development & establishment of Corruption Risks Management systems within National Government Agencies • Development & establishment of Corruption Risks Management systems at sub-national level (within Central, Enga, SHP, ENB, EHP, Morobe) **POW 15 – Administrative Support** - Staff Personnel - X4 Vehicles (OPP, NFCAD, IICAC	**POW 11: Strengthen Public Procurement System** • Strengthening Public Procurement System in National Government agencies (Independent Contract Project Management Services (ICPMS)) – 5% through National Government Budget Project funding to fund the ICPMS) • Strengthening Public Procurement System in Central, Enga, SHP, ENB, EHP, Morobe (5% for ICPMS) • Public E-Procurement and	**POW 8- Strengthened Coordination and Oversight of Anti-Corruption Programs** • Sustain anti-corruption program under Governance Branch at PM & NEC • Strengthen NEC Oversight for Bureaucratic Accountability **POW 9 - Strengthened Service Delivery through Service Charters** • Service Charters programs in Enga, SHP, ENB, Morobe, Central, EHP.	**POW 12 Components Implement CCVE** - Teacher Training on Specific Anti-Corruption Content - Support Resources for Anti-Corruption Themes in CCVE Content development 1) Follow the General orders 2) Serious offences referred to Fraud squad 3) Time management tasks – incorporate SBA – achieve tasks within set timeframes 4) Leave fare issues – overdue leave fares. Teachers will now apply for leave fares 5) Curriculum has been restructured - exiting from

VISION: Building a Strong and Prosperous Papua New Guinea				
IMPACT MEASURES	**THEMATIC AREA 1: ENHANCED INSTITUTIONAL FRAMEWORKS**	**THEMATIC AREA 2: ENHANCED INVESTIGATION, PROSECUTION AND ASSET RECOVERY**	**THEMATIC AREA 3: STRENGTHENED LEADERSHIP AND CORPORATE GOVERNANCE**	**THEMATIC AREA 4: IMPROVED TRANSPARENCY AND ACCOUNTABILITY – PREVENTION AND MONITORING**
OUTPUTS (Development Agendas)	- Office Equipment for Coordination Efforts (computers/Printers/Data Packages, Office desks) - ICT Needs – Website designs, **POW 14- Capacity Building, Strengthening and Monitoring** - CCVE Assessment Monitoring - NSA M&E - Curriculum Designers Training - Leadership Training - HRDSP - Legislative Drafting and Translating Policy into Legislation Trainings - Forensic Trainings - Specialist Investigations /Prosecutions Trainings - Financial Trainings - Contract Management Trainings - Workshops/Seminars/Conferences - Twinning Programs/ Secondment - Work Attachments etc. - Exchange Programs - Technical Assistance - Forensic Courses	E-Tendering (ICT Systems Management Capability) **Financial Reforms (National Procurement Commission Act 2020)** - Independent Project Management Teams – reporting to NPC, based on SOW - Certificate of Inexpediency (COI)- Only on Emergency Basis – NEC is the only approval body for COIs to alleviate corruption. - E-Procurement and E-Tendering for all public contracts (on website) - Appointment of Technical Procurement and Evaluation Committee Members – - Separation of Chairman and CEOs roles in the operations of NPC		OBE 6) General Education – Prep to Gr. 12 7) Post 16 – preventative measure to corruption 8) SBE – Standard Based Education – create jobs 9) Implementation of CCVE – Curriculum Christian Value Education 10) MOU with TIPNG – train teachers to teach children in fighting corruption 11) Challenges faced includes Teachers Training, no student text books (need to develop resource books), awareness for CCVE, printing and procuring, aligning moral values to general values, upskilling
INPUTS / PROCESSES	• **Time** • **Share expertise and personnel through inter-agency collaborations with ICAC** • **Data Management/Integration and ICT Developments** • **Shared Facilities across ICAC partnerships**			

VISION: Building a Strong and Prosperous Papua New Guinea

IMPACT MEASURES	THEMATIC AREA 1: ENHANCED INSTITUTIONAL FRAMEWORKS	THEMATIC AREA 2: ENHANCED INVESTIGATION, PROSECUTION AND ASSET RECOVERY	THEMATIC AREA 3: STRENGTHENED LEADERSHIP AND CORPORATE GOVERNANCE	THEMATIC AREA 4: IMPROVED TRANSPARENCY AND ACCOUNTABILITY – PREVENTION AND MONITORING
	• Memorandum of Agreements / Memorandum of Understanding • Sectoral Coordination of ICAC with relevant stakeholders • Funding and Resourcing of ICAC • Consolidated funding sourced from Donor Agencies • Identify key deficiencies in policies and laws relating to 4 Thematic Areas and advocate for review of these impediments • Effective Implementation, Monitoring and Evaluation and reporting of Government all ICAC funded and initiated programs/projects and Services • Improved Performance Management of ICAC • Continuously Building ICAC capacity, including staff capacity to enable delivery of Program Outcomes • Develop Monitoring and Evaluation mechanisms to enable ICAC to track Progress towards the attainment of its goals and targets. • Research & Development Initiatives			

RISKS
• Political Interdependence • Policy Shifts • No PIP funding / Funding Shortfalls • Organisational Restructures • Agency Engagement / Disengagement • Limited/No Agency Engagement and Collaboration • Fragmentations within ICAC Strategy or Plan of Action • 2022 National Elections

IMPLEMENTATION, REPORTING, MONITORING AND EVALUATION

(2020-2025)

1. Introduction

Monitoring and Evaluation will be an integral part of the National Anti-Corruption Plan of Action (NACPA) 2020-2025. Monitoring and evaluation will ensure that NACPA's implementation is on track and on target, and that the results it seeks to produce on its programmes are delivered as planned. This chapter and contents presented form the NACPA 2020-2025 Monitoring and Evaluation Framework. The different components of this framework have been summarised in this introduction, with more detailed explanations presented in the rest of this chapter.

NACPA PROGRAM LOGIC

The Vision, Impact Measures, Goals, Outcomes, Outputs and Inputs/Work Processes have all been captured in the Program Logic of the NACPA. The Program Logic acknowledges the NACPA 2020-2025 vision for ***Building a Strong and Prosperous Papua New Guinea***. There are four (4) impact measures or Thematic Areas. These include: 1) Enhanced Administrative Functions on Anti-Corruption; 2) Enhanced Legislative Framework on Anti-Corruption; 3) Improved Governance and Coordination; and 4) Improved Transparency and Accountability. There are altogether eight (8) Goals (Key Action Areas-KAAs) for which specific outcomes, identified as Program of Works – POWs are required. For each of the POWs certain outputs expect to be delivered, setting the development agenda for the NAPCA work program over the course of five (5) years (2020-2025).

REPORTING AND INFORMATION DISSEMINATION

Included in this NAPCA M&E Framework are two important strategies for Reporting and Information Dissemination, as well as the M&E Implementation and Coordination Strategy. The NACPA Reporting & Information Dissemination Strategy proposes the flow of reporting within the various structures that manage functional responsibilities of reporting and information dissemination. The NACPA M&E Implementation and Coordination Strategy provides an account of various parties and the different roles and expectations they are expected to deliver in supporting M&E for NAPCA.

Whilst Monitoring and Evaluation of NACPA 2020-2025 will involve several distinct yet mutually reinforcing processes; it is important that separate plans be developed for Monitoring and another for Evaluation.

MONITORING PLAN

The monitoring plan shall capture Financial Reporting and Activity Implementation Reporting. The monitoring activity shall focus on tracking ongoing progress to ascertain whether the measures and strategies (activities) are being implemented as outlined for each POW, and why. An important starting point for tracking progress will be to ascertain the achievement of the milestones of each POW. Feedback obtained from monitoring will be used to improve and strengthen the ongoing implementation of the program outcomes (POWs) of NACPA. Information from ongoing monitoring can be used for rewarding performance or sanctioning poor performance.

EVALUATION PLAN

The Evaluation plans shall undertake a Mid-Term Review or Evaluation scheduled midway through the program around June 2023; as well as conduct a Summative Evaluation at least two (2) months after NAPCA Program completion in 2025.

The evaluations shall be conducted periodically and focus on the attainment of specific results of each POW and how achievements for such results has contributed to the overall objectives of each POW and their impact on the PNG NACS KAAs and long-term goals. There will be two phases to the evaluation of the NACPA's POW: (a) a mid-term review halfway through the life of NACPA, i.e. two

and half years through the implementation of the NACPA (mid 2023), and (b) a summative evaluation, at the end of NACPA.

Mid-Term Review: The mid-term review will allow for the assessment of planned targets earmarked to be realised midway through the life of NACPA 2020-2025 and will be an opportunity to draw important lessons. The realignment process of the NACPA, if any, can take effect after the mid-term review.

Summative Evaluation: The summative evaluation is an overall assessment exercise of the entire NACPA 2020-2025 to determine what has worked and what has not, and why. Summative Evaluation will ascertain whether planned objectives/results have been achieved, and more importantly, whether planned objectives/targets have created the desired impact on the planned KAAs in the PNG NACS. Where performance has been negligent or sub-standard, summative evaluation will ascertain why this has happened. Information derived from summative evaluation is important for performance management purposes in terms of learning and formulating future anti-corruption strategies, rewarding performance, and maintaining the accountability of those tasked to deploy the NACPA. Because each NACPA including this one will be a dynamic document, it should be expected that NACPA planning will continue to evolve, responding to the changing nature of corruption and hence the need for government and partners to respond to such changes. As such lessons derived from the summative evaluation exercise will be useful for the formulation of the next round of NACPA.

DATA COLLECTION TOOLS AND TEMPLATES

Deciding on a starting point is crucial for establishing good data to feed into the M&E system for any organization. As such the NACPA M&E Framework has included some basic data collection tools and templates to capture required M&E data going forward. These will be revised and amended as required.

PROCESS OF DEVELOPING M&E QUESTIONS

M&E as a process requires tools and the ability to ask the right questions. A guide is provided for the development of sound and relevant monitoring and evaluation questions, largely informed by indicators and targets consistent with all planned NACPA activities and the Program Logic.

REVIEW OF NACPA M&E FRAMEWORK

The M&E Framework is not a one-time occurrence, but rather an ongoing process of review, revision, and implementation. The framework will be reviewed and revised annually. This review process ensures that all M&E elements remain relevant and effectively support program management and organizational learning.

GLOSSARY OF KEY M&E TERMINOLOGIES

An important reference tool and Glossary of Key Monitoring and Evaluation Terminologies is included for ease of reference.

In summary, the NACPA M&E Framework includes the following components:
- The NACPA Program Logic,
- NACPA Reporting & Information Dissemination Strategy
- NACPA M&E Implementation and Coordination Strategy
- Monitoring Plan
- Evaluation Plan
- Data Collection tools and templates

- Guide for Developing M&E Questions
- Data Collection Tools and Templates
- Glossary of Key M&E Terminologies

2. NACPA Program Logic

The Program Logic above (Table 1), illustrates the causal chain of Inputs/processes, outputs (Development Agendas) and outcomes that ultimately lead to achievement of the four Thematic Goals and the overall Vision of ICAC– Building a Strong and Prosperous Papua New Guinea. Inputs and processes are the resources or methods employed to bring about change while outputs are the direct result of expenditure of resources and collaborations established between ICAC and partners agencies. Outcomes on the other hand are contributions to the overall objectives of ICAC for the four Thematic Areas, usually reflecting a permanent change in systems and institutions, behaviors, attitudes and practices accomplished by partners and the public service machinery and beneficiaries. Impact Measures are the long-term change arising from the interventions extended by ICAC and other actors over the next 5 years (2020-2025) that will lead to 1) Enhanced Administrative Functions on Anti-Corruption (Thematic Area 1); 2) Enhanced Legislative Framework on Anti-Corruption (Thematic Area 2); 3) Improved Governance and Coordination (Thematic Area 3); and 4) Improved Transparency and Accountability

3. NACPA Reporting & Information Dissemination Strategy

The Reporting and Information Dissemination Strategy (Table 2) is a wider extension of the reporting requirements and schedule. It follows a logical sequencing on the flow of reporting within the various structures that manage functional responsibilities of reporting and information dissemination. It outlines the Audience Interests (Sources and Rationale). Identifies the overall focus of the Report Types, Identifies the specific or required contents of that report and assigns responsibilities on how a report is to be disseminated across the various reporting platforms

3.1. NACPA Reporting Schedule

The regular reporting on progress in the implementation of NACPA planned activities and the extent to which the ICAC achieves and is achieving its results is an integral part of this M&E Framework. This will serve as a mechanism for sharing the NACPA story both internally (within whole of Government and PNG Domestic Economy) and externally to our other development partners and the International Community. Apart from activity-based reports, quarterly reports will be prepared for all projects and thematic areas to generate a consolidated ICAC Annual Report that captures the performance of all projects and activities at the end of each calendar year. The reports will capture the progress made in project/activity implementation, challenges; lessons learned and proposed interventions to address any gaps in NACPA activity implementation. A comparative analysis of the planned versus actual activities will also be included in the reports to track project progress against set targets and timelines. All quarterly reports will be due within the usual GoPNG reporting timelines.

Table 2. NACPA Reporting Schedule

Report Type	Due Date	Audience Interests		Overall Focus	Contents	Dissemination
		Source	**Rationale**			
Formal Reporting						
Routine Monitoring	Quarterly	- Funding Source (PIP, others) - Dept/Agency - Thematic Areas - ICAC	- Accountability - Program Management - Program Improvement	- Adequate budget support against Thematic Areas - Progress to Date - Improvements to Performance	- Financial Reporting - Output Deliverables - Performance Against Milestones	- Email exchanges and circulation within the various structures i.e. ICAC office, interagency collaborations, Updates, meeting notices, **Reporting template** - Responsible agencies to complete templates
Mid-term Evaluations	Mid-Program (June 2023)	- Funding Source (PIP, others) - Dept/Agency - Program - Donors	- Program Management - Program Improvement	- Strategies to Improve Performance - Learning for Continuous Development	- reasons for success/lack of success in performance - Focus Areas requiring Improvements	- Evaluation Report (Template to be developed) - Printed and Spiral Bound Report - Distribution to stakeholders - Production of summary brochures - Post full report on relevant media platforms
Summative Evaluations	End of Program (Dec 2025)	- Funding Source (PIP, others) - Dept/Agency - Program - ICAC	- Accountability - Decision Making - Program Management - Learning	- Program Conclusion - Lessons Learned - Recommendations re Program Continuation or Change in Directions	- Overall Performance - Program Quality and Value - Conclusions - Lessons - Recommendations	- Evaluation Report (Template to be developed) - Desktop Published and Printed Report - Distribution to stakeholders - Production of summary brochure - Post full report on relevant media platforms

| Report Type	Due Date	Audience Interests		Overall Focus	Contents	Dissemination
		Source	**Rationale**			
Annual Report for ICAC	End Calendar Year	• ICAC • Ministerial Committee • Program	• Accountability • Program Management • Program Improvement	• Overview of Achievements (Annual) • Challenges	• Financial Report • Personnel Report • Performance Against Milestones • Success Stories	• Annual Report Format • Desk top Published and professionally Printed • Posted on relevant media platforms
Adhoc and Events Reporting						
Case Studies	Intermittent	• Funding Source (PIP, others) • Dept/Agency • Thematic Areas	• Wider learning	• Strategies to Improve Performance	• Performance Outcomes and Impact • Areas of future focus	• Post on relevant media platforms • Intra-Agency collaborations •
Publications (eg. Articles, Success Stories)	Intermittent	• External stakeholders	• Wider learning	• Knowledge sharing	• Key messages	• Journal articles • Conference and workshop papers • Social media
Special Reports	Intermittent	• External stakeholders • Beneficiaries	• Wider accountability and learning	• Knowledge sharing	• Key messages	• Public outreach and awareness at Provinces/Districts/LLGs and communities to present reports and discuss results with beneficiaries

3.2   Information Dissemination and Communications

Information dissemination involves the targeted distribution of information and materials extracted from NACPAs monitoring and evaluation framework. The PNG NACS 2010-2030 (Strategy) is not only about criminalising corrupt conduct; but more importantly, about preventive measures, which is one of the goals under Thematic Area 4 for NACPA. Information dissemination facilitates information for educating our youths and children about the dangers of corruption and ethical conduct. This strategy intends to: 1) Facilitate information for public awareness and 2) Encourage partnerships and cooperation with all other stakeholders including Government Departments and Agencies, donors and civil society organisations establishing NACPA to become an avenue for driving the message of anti-corruption and good governance.

The NACPAs Information dissemination is also dependent on an effective communication strategy. Good dissemination and communication are a carefully planned process that involves the target audiences, deciding and designing key messages and the adoption of appropriate communication strategies to achieve desired outcomes (Wilson, Petticrew et al, 2010).

The NACPA M&E Framework will adopt a simplified 6 step process as its strategy for information dissemination and communication. The development of a plan for this is captured in the stages of cycle outlined in Figure 1 below.

Figure 1: NACPA Information Dissemination and Communication Cycle
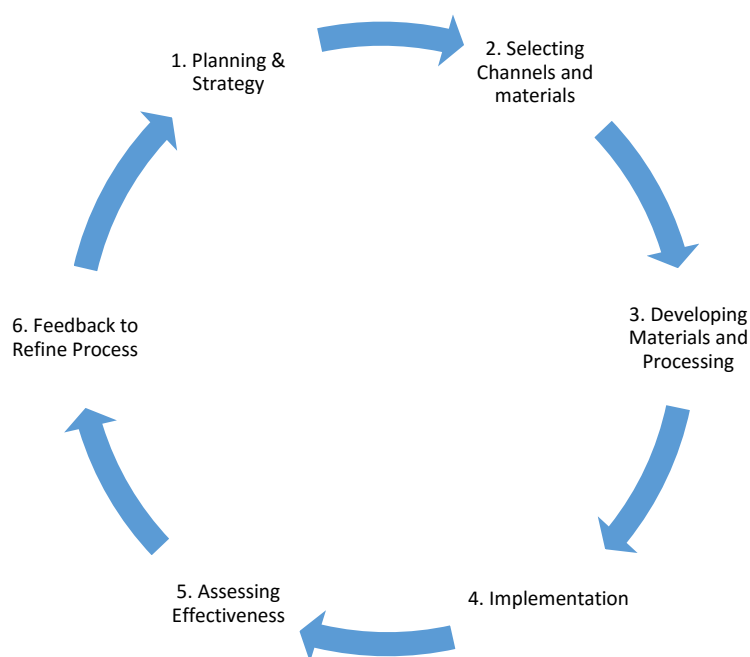
1. **Planning**
   - Dissemination objectives
   - Target audience-identify who they are, current perceptions, preferred way of receiving information (Primary and Secondary)
   - Key messages, including the 'call for action' message and any message to counter negative campaigns by potential interest groups
   - Sensitivities
     - Contentious issues
     - Potential impact on government
     - Need for risk management strategy
     - Need for media team to manage risk

- Work plan, including activities, source/channel, timeframe, responsibilities, budget

2. **Selecting Channels and Materials**
   - Dissemination Options
     - Print
     - Digital (Radio, TV, social media, Other Apps)
     - Outdoor advertising
     - Events (workshops, launch etc)

3. **Developing Materials and Processing**
   - Appropriate Materials
     - What formats will be useful
     - Language appropriateness-is language appropriate for intended user (translation of Information, Education and Communication materials)
     - Have copyright and legal issues been addressed
     - Have materials been pre-tested

4. **Implementation**
   - Is an official launch event required?
   - Media strategy to address sensitive issues raised by journalist or lobby groups?
   - Existing partnerships with organisations to promote the material
   - Considerations for Cultural appropriateness of materials
   - Material access for people with special needs (vision or hearing-impaired members of community)

5. **Assessing Effectiveness**
   - Evaluation Plan
     - Track online/offline spread
     - Survey target users on their awareness of guidelines
     - Consider overall effectiveness of dissemination
     - Identify the cost of effective strategies

6. **Feedback and Refine Process**
   - Refining the Dissemination or Communication Strategy
     - Establish process to modify future versions of guidelines/communication strategy based on evaluation outcomes
     - Implement governance plan for management of refined guidelines

4. NACPA M&E Implementation and Coordination Strategy

Monitoring and evaluation of NACPA 2020-2025 will involve different parties. Monitoring and evaluation will only be useful if parties responsible for monitoring and evaluation take their role seriously and use monitoring and evaluation data to strengthen efforts to fight corruption. The various parties that will be involved in the monitoring and evaluation functions are captured in the NACPA M&E Implementation and Coordination Strategy

Table 3: NACPA M&E Implementation and Coordination Strategy

Party	Type of Assessment	Goal of Assessment	Responsibility
Chief Secretary through PMNEC and the IU *Interim ICAC*	**Summative Evaluation**	• Determine overall success or failure of the NACPA 2020-2025 • Ascertain achievements of POW's results and overall objectives and the impact of NACPA on PNG NACS's KAAs and long-term anti-corruption goals • Establishes what has not worked and why • Draw lessons and strategize on future development of the next round of NACPA • Enforce accountability	• Assumes overall responsibility for the success or failure of the NACPA 2020-2025 • Sets the TOR of the summative evaluation and take corrective measures on the findings of the summative evaluation
IU & PMNEC *May be carried out jointly by implementing agency (Interim ICAC) But IU and PMNEC takes overall leadership*	**Mid-Term Review**	• As above • Determine the achievement of planned results/targets halfway through the life of the NACPA 2020-2025 • Extract lessons and realign NACPA if necessary • Take action on non-performing areas.	• Sets the TOR for the mid-term review and provide overall leadership • Responsibility may be carried out in consultation with respective implementing agency. • PMNEC is to ensure that the POWs are implemented correctly as per the findings of the mid-term review • PMNEC is to ensure that regular monitoring is carried out by implementing agencies
Implementing agencies responsible for respective POWs led by ICAC (PMNEC, DPM, DJAG, NACSTF, NACA, DOF, civil society organizations, departmental heads, audit and accountability bodies	**Monitoring**	• To keep tract of ongoing progress • To take corrective measures where necessary • To report findings to PMNEC if corrective measures is beyond the control of implementing agency • To ensure that POWs are correctly implemented as per the NACPA 2020-2025	Assumes responsibility for all monitoring activity on the implementation of NACPA POW's activities.

5. NACPA Monitoring Plan

The NACPA Monitoring plan is divided into 2 parts with some suggested templates and tools to capture monitoring data. The 2 Part Monitoring Plan includes:

1. Financial Monitoring
   - Budget Tracking Tool
   - Financial Status
2. Activity Implementation Monitoring
   - Analysis of Planned versus Actual Activities
   - Milestone Deliverables Schedule

5.1 Financial Monitoring

Budget Tracking Tool

The rate of absorption of resources is a proxy measure of the extent of project implementation. The slow pace of resource utilization, especially around finance and budget drawdowns serves as an early warning and indication that things are not progressing as they should and therefore prompt the need for corrective measures to streamline project/activity implementation. Each activity will be required to provide an analysis of planned expenditure against actual expenditure on a quarterly basis and provide an explanation on any variance greater than 10%. The analysis will be provided along the set budget lines as provided in the GoPNG financial system.

Table 4. Tracking Planned versus Actual Expenditure per Activity (Quarterly)

Budget Line (Item)	Planned Expenditure	Actual Expenditure	Variance (%)
Salaries and benefits			
Equipment			
Travel and Logistics			
Operations & Maintenance			
Project implementation			
Total			

Financial status

This template captures a concise overview of NACPA, and their financial status based on the monthly finance reports per reporting quarter. When completing this section NACPA-funded projects/programmes should refer to the monthly project/programme financial management reports. This report should be aligned with and reflect the information in the project financial management report (ideally completed every monthly). ICAC Staff and officers at partners agencies are encouraged to use the project quarterly finance status table below to summarize key financial data. Specific attention should be given to spend rates and forecasts for the current reporting period.

Table 5. Activity Quarterly Finance Status

Total Budget to Date	Total Expense to Date	% of Total Budget	Annual Budget	Annual Expense	% of budget

5.2 Activity Monitoring

Analysis of Planned Versus Actual Activities

To ensure that the annual work plan/ implementation plan is tracked effectively, quarterly/monthly analysis of the planned activities against what is being achieved must be systematically aligned in the NACPA reporting mechanism. This will form part of the quarterly/monthly reports. Projections of

activities planned for the subsequent reporting period will also be included in the quarterly/monthly report and serve as a basis for assessing progress in implementation activities during the next reporting cycle.

Weekly plans established within the Agency's (ICAC) own specific deliverables and task assigned to the activity may prove useful when tracking individual officer inputs, but that is a micro-management tool best left for the respective managers at the partner agency levels. The greater benefit for this is that it ensures increased accountability, effective utilization of time and serves as an easy follow-up mechanism.

Quarterly Reporting Templates

Quarterly reporting templates have been developed for the four Thematic Areas of NACPA. Find below these templates and tools this M&E Framework. Whilst the templates capture details assigned to activity implementation at the agency level, the table below provides a summary overall of all activities for one thematic area.

Table 6. Analysis of Planned NACPA Activities (As per Annual Work Plan)

THEMATIC AREA						
OUTCOME						
REPORTING OFFICER						
ACTIVITY LOCATION						
YEAR / DATE OF REPORTING						
PLANNED ACTIVITIES	STATUS: *Completed, partially done, delayed etc..*				Comments on Progress	Way Forward
	Q1	**Q2**	**Q3**	**Q4**		

Milestone Deliverables Schedule

As part of the monitoring plan. It is proposed that the expected milestones be properly tracked and systematically reported in the quarterly reports. This template should include the expected milestones, schedule on proposed/expected delivery dates and the actual dates of delivery.

Table 7. Milestone Deliverables

Thematic Area	Activity	Expected Milestone (Deliverable)	Due Date	Date Delivered	Agency / Person (s) Responsible	Comments

5.3 Indicator Tracking

Quarterly tracking of indicators data will be undertaken to assess the progress in realizing set indicator targets. The designated M&E officer for ICAC should develop a process of collecting and collating all relevant data on all indicators. These should then be reviewed, analysed and presented in all quarterly and annual reports.

The table below provides a template that should be added to the Quarterly and yearly reports and serve as an indication of progress towards the set targets, and status update on work completions to the date of reporting.

Table 8. Indicator Tracking Table

Activity Name		Reporting Period		Agency officer	
Activity Location		Activity – Start Date		Activity Implementing Agency	
Thematic Area		Activity – Expiry Date		Reporting to Co-Chair (Agency)	
Indicator	**Annual target**	**Achieved This Quarter**	**Cumulative to Date**	**Variance**	**Reasons for Variance**

6. NACPA Evaluation Plan

Performance evaluation is an integral part of the overall implementation of NACPA M&E Framework. Periodic assessment of the extent to which NACPA is realizing the expected results will be an essential process for ensuring accountability to stakeholders, improve effectiveness and efficiency in implementation and supporting learning. The following principles will serve as a guideline to our evaluation approach:

- Integration of evaluation in future design of activities and redesign of ongoing ones.
- Design of evaluations that are unbiased in measurement and reporting.
- Evaluations that address the most important and relevant questions about activity performance.
- Evaluations that use methods that generate high quality and credible evidence corresponding to the research evaluation questions being asked.
- Evaluations that help reinforcing local capacity through participatory methodologies; and
- Evaluations that are transparent.
- In tandem with the above principles, the NACPA Framework intends to undertake 2 types of evaluations:
  - 5.1. Mid-term evaluation and
  - 5.2. Summative evaluation

6.1 Mid-term Evaluation:

Internal mid-term review or evaluation will be conducted for NACPA to answer the following overarching questions:

- What has the program achieved so far?

- How well is it being implemented?
- Are the planned activities on schedule?
- Are the inputs sufficient to produce the desired outputs, outcome and impact?
- How is it perceived and valued?
- Are expected results occurring or likely to occur?

The mid-term review will essentially be in the form of process evaluation and will be critical in enhancing project performance and serving as an early warning in case things are not working as expected. Lessons learned from the midterm review will be used in redesigning the project, where necessary and feasible, to increase chances of meeting expected results. This review is expected to be conducted to be conducted mid-way through the lifespan of the NACPA around June/July 2023.

6.2   Summative Evaluation

This essentially will be an external evaluation with a more rigorous approach to establish the cause-effect relationship between the activity/project interventions and the final outcome and impact of the project. The evaluations will be designed around five key evaluation criteria i.e. appropriateness, effectiveness, efficiency, impact and sustainability and will be expected at least 30 days after the completion of the NACPA at the end of 2025.

7. Process of Developing Monitoring & Evaluation Questions

The development of monitoring and evaluation questions will largely be informed by the indicators and targets of planned NACPA activities and as per the Program Logic. The line of enquiries will also be based on the evaluation criteria of appropriateness, effectiveness, efficiency, impact and sustainability.

The process of developing these questions involves a workshop of M&E practitioners and officers of ICAC and its partner agencies to firstly agree on their indicator selection and where appropriate discuss the targets for each activity (where required). These approved indicators and targets will then be used to highlight and develop the M&E questions to determine the performance levels of NACPA.

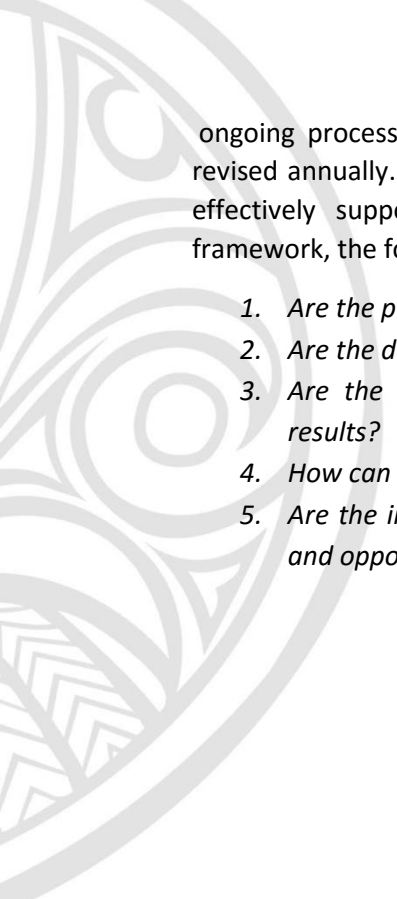*Table 9. Common Headlines and Subsidiary Evaluation Questions*

Evaluation Criteria	Evaluation Questions
Appropriateness • Suitability of program design in given context • Suitability of program with Program Logic • Testing of Underlying assumptions • Extent program meets the priorities and needs of key stakeholders	*To what extent was the design of the program suitable in meeting the needs of key stakeholders and beneficiaries*
	• To what extent was the nature and scope of the need or problem to be addressed clearly articulated? • Within the parameters of the program design, to what extent were the intended target group or program beneficiaries clearly identified? • Was the program logic correct in capturing program intent? • Were the underlying assumptions for triggering change clearly identified? • To what extent was the program design suitable for the cultural context? • To what extent did the program design meet funding priorities and policies? • To what extend did the program design meet the needs of the broader stakeholder community? • To what extent did the program design meet target group

Evaluation Criteria	Evaluation Questions
	and beneficiaries?
•	
	To what degree was the program able to achieve its stated Objectives?
	• To what degree were benefits of the program available to the intended target group and beneficiaries? • What factors contributed to, or prevented achievement?
	To what degree can the program be assessed as being of value to its key stakeholders and beneficiaries?
	To what degree can the program be assessed as being of good quality?
Efficiency • Conversion of Inputs to outputs and outputs to outcomes/results • Governance and management	*To what extent was the program implemented in an efficient manner?*
	• To what extent were the intended outputs delivered? • To what extent were the costs of program delivery justifiable against its results? • To what degree was the program cost effective when compared with other similar programs and or options that address the same needs? • To what extent were available resources (budget/staff/time) used to best effect? • To what degree were there good governance and management of the program?
Impact • Changes (results) produced by the program, intended and unintended, direct and indirect	*What results expected and unexpected, and direct and indirect produced by the program?*
	• To what extent did the program achieve its intended changes? • What factors led to change or contributed to lack of change? • To what extent were changes identified attributable to the program or its effects? • Which changes were intended, and which were unintended?
Sustainability • Continuity of program Benefits	*To what degree was there an indication of ongoing benefits attributable to the program?*
	• To what degree did the program develop potential capacity (in individuals and organisations) to produce ongoing benefits? • What factors contributed to or prevented the achievement of ongoing benefits? • To what extent can and should the program model be replicated to other settings?

8. M&E Framework Review

The M&E framework will serve as a "living document" that the NACPA will use to guide overall organizational and program performance. One of the key principles of the M&E framework is that it should be a useful tool for management and organizational learning. In this respect, it will be updated as necessary to reflect changes in NACPA Thematic Areas or Delivery Plans for ongoing and/or upcoming development activities.

Implementation of the M&E framework is therefore not a one-time occurrence, but rather an

ongoing process of review, revision, and implementation. The framework will be reviewed and revised annually. It will also be re-examined to ensure that all M&E elements remain relevant and effectively support program management and organizational learning. When reviewing the framework, the following issues shall be considered:

1. *Are the performance indicators adequate and relevant?*
2. *Are the data management processes effective?*
3. *Are the performance indicators providing the information needed to properly measure results?*
4. *How can the project/activity performance be improved?*
5. *Are the indicator targets realistic given resource availability and other program constraints and opportunities?*

9. GLOSSARY OF COMMON M&E TERMINOLOGIES

Accountability: refers to the obligation of an individual or organization to account for its activities, accept responsibility for them, and to disclose the results in a transparent manner. It also includes the responsibility for money or other entrusted property.

Assumptions: critical assumptions are those key things we assume will or will not take place that are likely to affect results.

Baseline: is a record of what exists in an area prior to an action or a benchmark upon which future performance will be measured.

Data management: refers to the standard operation procedures/routines and actions put in place to track data flow and reduce risk/probability of errors.

Data quality: refers to the accuracy or worth of the information collected.

Effectiveness: measures the degree to which results/objectives have been achieved.

Efficiency: measures how productively inputs (money, time, equipment, personnel etc.) were used in the creation of results.

Evaluation: is a systematic process of collecting and analysing information to assess the effectiveness of an organization in the achievement of results.

Impact: is the overall and long-term effect of an intervention

Indicator: is specific information that provides evidence on the achievement (or lack of) results and activities. They can be quantitative (number related) measures or qualitative (narrative related) observations).

Inputs: are the physical (e.g. equipment), material (e.g. supplies and provisions), human (personnel) or financial (e.g. travel costs, per diem etc.) resources required to create change.

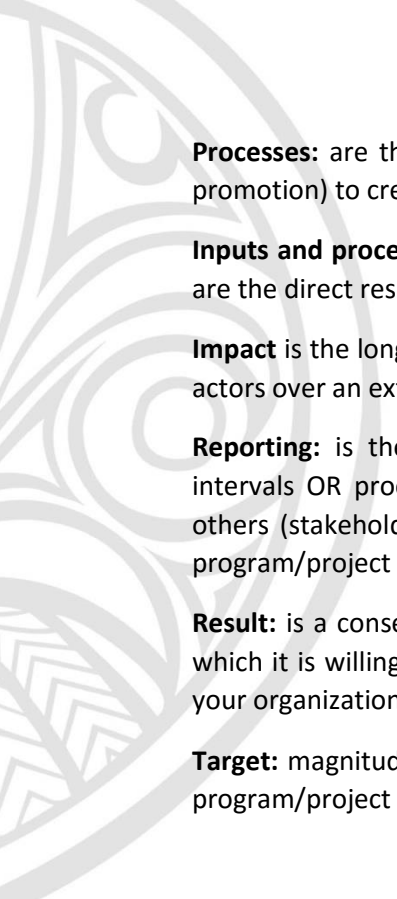**Learning:** the process through which knowledge is expanded.

M&E system: is a tool that organizations and managers use to see if they are achieving change.

Monitoring: is a systematic process of collecting and analysing information to track the efficiency of the organization in achievement of results.

Outcomes: are the broad changes in development conditions, answering the "so what" questions (so... we trained 100 people and increased their capacity to advocate for increased respect to the right to own property but did those improved skills result in more widows being allowed to own property?). Outcomes reflect behaviour or attitudinal changes. Outcomes on the other hand are contributions to the overall goals and ultimate Vision of NACPA, usually reflecting a permanent change in systems and institutions, behaviours, attitude and practices accomplished by partners.

Output: is information, products or results produced by undertaking activities or projects. They relate to the completion of activities and reflect what you hoped to achieve from a certain input. For example: you decide the process you want to use is train people, thus people trained is the result at input/process level while knowledge level increased would be the result at output level.

Program Logic: A visual representation of the causal chain of Inputs/processes, outputs and outcomes that ultimately lead to the achievement of established goals and the overall Vision of a program intervention. (for ICAC– Building a Strong and Prosperous Papua New Guinea)

Processes: are the methods employed (e.g. training, capacity building, service provision, message promotion) to create change.

Inputs and processes are the resources or methods employed to bring about change while outputs are the direct result of expenditure of resources.

Impact is the long-term change arising from the interventions established by the program and other actors over an extended period.

Reporting: is the systematic and timely provision of essential (useful) information at periodic intervals OR process of providing regular feedback to help organizations inform themselves and others (stakeholders, partners, donors etc.) on the progress, challenges, successes and lessons of program/project implementation.

Result: is a consequence of an activity, project or program that an organization can effect and for which it is willing to be held accountable OR a change in condition attributable in whole or part to your organization.

Target: magnitude or level of outputs expected to be achieved OR values against which the actual program/project achievements are measured.