Legal and Policy Frameworks Regulating the Behaviour of Politicians and Political Parties—Ghana

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Contributors:

Kwesi Aning

Fiifi Edu-Afful

International IDEA
Strömsborg
SE-103 34 Stockholm
Sweden

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Preface

In recent years the world has witnessed the increased capacity of illicit transnational networks to threaten the legitimacy of democratic institutions and political processes in both emerging and established democracies. Even though these networks typically use violence and intimidation to contest and challenge state institutions, they are increasingly using other (more subtle) methods to manipulate political processes. These include forging strategic links with politicians and political parties by inter alia funding political campaigns, participating in money laundering schemes, establishing new political parties and movements, and even joining in economic ventures and legitimate businesses.

International IDEA therefore launched the *Protecting Legitimacy in Politics* project to contribute to the understanding of the nexus between organized crime and politics in various regions and improving policy responses to those challenges. The project is designed to generate empirical knowledge on its extent and modalities, document the existing regulatory frameworks that restrict and punish the illegal behaviour of politicians, and facilitate policy debates with decision-makers at national and regional levels.

In West Africa, International IDEA joined forces with the Inter-Governmental Action Force against Money Laundering in West Africa (GIABA) to work with local researchers in the region. This work intended to analyze some existing policy frameworks that regulate the behaviour of political actors and parties, as well as to explore their implementation challenges, seeking to channel new policy alternatives at national and regional levels. This report is the result of those efforts in Ghana, and complements similar reports that will be published for other regions, such as the Baltic states and Latin America.

Vidar Helgesen
Secretary-General
International IDEA

Acronyms and abbreviations

AU	African Union
CHRAJ	Commission of Human Rights and Administrative Justice
CSSDCA	Conference on Security, Stability Development and Cooperation in Africa
EC	Electoral Commission
ECOWAS	Economic Community of West African States
FATF	Financial Action Task Force
GIABA	Groupe Intergouvernmental d'Action contre le Blanchiment d'Argent en Afrique dei'Ouest [Inter-Governmental Action Force against Money Laundering in West Africa]
IEA	Institute of Economic Affairs
IPAC	Inter-Party Advisory Committee
IPMC	Inter-Party Monitoring Committee
NACOB	Narcotics Control Board
NDC	National Democratic Congress
NEB	National Enforcement Body
NEPAD	New Partnership for Africa's Development
NPP	New Patriotic Party
RPD	Reformed Patriotic Democrats
ULP	United Love Party
URP	United Renaissance Party

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Introduction

Since Ghana' independence, political parties have emerged as an important institution in the country's democratic practice. In the period of transition from the colonial rule into an independent state, political parties and politicians have played an enormous role in shaping the political process and the democratic credentials of Ghana. Increasingly, political parties in Ghana have been driven by the core principles of democracy and have become a medium through which individuals carry out their obligations to the state. Ghana's current constitutional democratic dispensation is modelled on the 1992 Constitution which promotes a multi-party competitive system. Twenty years into constitutional rule, several political parties have emerged essentially expressing sub-national or ethnic, regional, religious or supra-national identities (Ninsin 2006). However, all these parties are guided by the democratic principles of self-determination, right to association and the right to free choice (*ibid.*).

Today, although Ghana can boast an emerging culture of successful presidential and parliamentary elections, political plurality, political stability and relatively strong institutions of governance, the country remains weak in dealing decisively with political party actors. It is becoming obvious that the behaviour of politicians and political parties has a potential dark side that has the propensity to derail the gains made in the advancement of democracy in Ghana.

This article explores the legal and policy frameworks that exist to regulate the behaviours of politicians (elected or appointed) and political parties and highlights the existing loopholes in the legislation that can pose major threats to the legitimacy of democratic politics and governance in Ghana. The article is organized as follows: Section one reviews the existing established mechanisms for eliciting compliance with respect to political party formation and financing in Ghana. We argue that while Ghana has many laws purposely

crafted to regulate the behaviour of political parties and politicians, the first challenge is the political will to enforce such laws. Second, there is the apparent ineffectiveness of governance institutions to ensure that due process is always followed. Third, political actors tend to politicize any unlawful behaviour and crime to secure non-interference by state institutions. And, finally, the multiple functions of public institutions have weakened their coordinating roles and responsibilities in enforcing the rule of law. In Section two, we produce a comprehensive map of current mechanisms within the legal and policy frameworks that exist to regulate the behaviour of politicians and political parties. We juxtapose the public rhetoric and behaviour of politicians against anti-corruption frameworks such as the public officials' code of conduct, regulations dealing with conflict of interest, procedures for appointing and promoting public officials and procurement rules. Third and finally, we conclude with some thoughts on the issue of transparency with reference to the disclosure of assets and the existing accounting regulations that govern the vetting processes for elected and appointed officials.

Political Party Formation and Financing

Broadly speaking, Article 55 of the 1992 Constitution and the Political Parties Act, 2000 (Act 574) provide the legislative framework within which political parties are to be formed in Ghana. Additionally, Ghana identifies with the norms on freedom of association as enshrined in a number of international provisions such as the New Partnership for Africa's Development (NEPAD), African Charter for Population Participation in Development and Transformation and the Conference on Security, Stability Development and Cooperation in Africa (CSSDCA) (OSIWA 2007). Accordingly, Article 55(1) of the Constitution guarantees the right to form political parties, while Article 55(2) grants all Ghanaians of voting age the freedom to join any political parties of their choice (Republic of Ghana 1992). Article 55(3) empowers political parties to fully participate in the political process and help with the development of policies for Ghana. In addition, Part Two of the Political Parties Act 2000 (Act 574) also suggests that every citizen of voting age has the right to form or join a political party (Republic of Ghana 2000). Theoretically, the constitutional requirements relating to the formation and responsibilities of political parties clearly stipulate that the internal organization of a political party must conform to democratic principles. Consequently, political parties must:

> (a) uphold regional balance in appointing party executives and national executive committees (b) must be visible in all regions and not less than

> two-thirds of the districts (c) the party's name, emblem, colour, motto or any other symbol must have no ethnic, gender, regional, religious, sectional connotation or appear that its activities are confined only to part of the country.
>
> (Republic of Ghana 2000)

In practice, however, most of the smaller political parties—for example, the United Renaissance Party (URP), the United Love Party (ULP) and the Reformed Patriotic Democrats (RPD)—may be ostensibly democratic but hardly exhibit the overall tenets of democracy in their actions. As is often the case—with the exception of the two major political parties, the National Democratic Congress (NDC) and the New Patriotic Party (NPP)—some of the smaller parties revolve around individual leaders and are not generally nationwide in scope. Although the Electoral Commission (EC) has duly registered some of these parties (such as the RPD and URP), they are only active in certain parts of the country. In many and sometimes surprising ways, the Electoral Commission[1] of Ghana, under whose supervision political parties are registered, is unable to thwart the registration of these 'one-man' political parties. Additionally, the modus operandi of some of these political parties in Ghana, particularly with reference to the selection of candidates for party executive and leadership positions, tend to overlook the democratic principles of free choice, transparency and participation. Overall, there still remains a lack of internal democracy within some parties, exemplified by the incidence of vote-buying, bribery and corruption, imposition of candidates and allegations of favouritism and intolerance of dissenting views. However, the manner in which the opposition NPP modelled its 2010/2011 party primaries on the national elections is a great step towards the achievement of political plurality and democracy in Ghana. Regardless of the constitutional provision that tasks political parties to shape the political will of the people through the dissemination of information, political parties have become electioneering machines heavily focused on gathering electoral votes (OSIWA 2007). In effect, political parties have lost their crucial role of being a lead institution in the development of the state. The result is a move away from the politics of principles and ideas to the politics of insults and defamation.

Certainly, there are considerable difficulties in addressing the challenge of political party funding in Ghana. The fact remains that the success of political parties effectively hinges as much on their finances as it does on their membership, leadership and party programmes (Daddieh and Bob-Milliar 2012). The major problem for all the political parties has been the issue of party financing. More often than not, with the exception of incumbent parties, many of the parties struggle to raise money to run their campaigns

and party activities. The lack of transparency in campaign financing and the absence of state support for political parties have created opportunities for drug traffickers to participate in the governance process (Aning 2009). For example, the ex-NPP Member of Parliament for Nkoransa North Constituency,[2] Eric Amoateng, was incarcerated for ten years for trafficking 136 pounds of heroin with a street value of USD 5 million. The question has always been why political parties are rich when they are in power and broke when they are in opposition? Several factors, such as corruption, siphoning of state funds and donor support for incumbent parties, account for this scenario.

Article 55(15) of the Constitution and Section 23(1) of Act 574 emphasize the point that, 'Only a citizen may contribute in cash or in kind to the funds of a political party […] A firm, partnership, or enterprise owned by a citizen or a company registered under the laws of the Republic at least seventy-five percent of whose capital is owned by a citizen is for the purposes of this Act a citizen'. However, there are reported cases of an influx of money from places such as Nigeria, Burkina Faso, Côte d'Ivoire and Dubai to support political parties in their campaigns (Asare 2011). Likewise, because of the way in which money was flaunted in the run-up to the polls during the 2008 electioneering campaigns, politicians were suspected of receiving support from drug traffickers.[3] This illegal activity is inconsistent with the constitutional provision that bars foreigners as well as drug traffickers from supporting political parties in Ghana. Section 24 of Act 574 maintains that, 'A non-citizen shall not directly or indirectly make a contribution or donation or loan whether in cash or in kind to the funds held by or for the benefit of a political party and no political party or person acting for or on behalf of a political party shall demand or accept a contribution, donation or loan from a non-citizen'.

It is for this reason that the ruling National Democratic Party has been asked to disclose the source of its funding for the party's USD 20 million ultra-modern office complex. The level of this expenditure stinks even more of corruption when the party is evasive about the source of its funding for this project.[4]

Then again, private business support for political parties and politicians in Ghana, although legal, is often kept secret (Ashiagbor 2005). The penalties stipulated in the Constitution to deal with violation of Section 24 are clearly spelt out in Sections 25(1) and 25(2). Section 25(1) states that, 'any person who contravenes section 23 or 24, in addition to any penalty that may be imposed under this Act, any amount, whether in cash or in kind paid in contravention of the section shall be recovered from the political party as debt

owed to the State. The political party or person in whose custody the amount is for the time being held shall pay it to the state'.

Section 25(2) further states that, 'A non-citizen found guilty of contravention of section 24 shall be deemed to be a prohibited immigrant and liable to deportation under the Aliens Act, 1963 (Act 160)'. However, when it comes to the issue of compliance with and enforcement of Sections 25(1) and 25(2), unfortunately there are no existing mechanisms to verify the income streams of political parties and the patrons making such donations.

Importantly, Article 21(1) of the Political Parties Act 2000 (Act 574) lays down comprehensive rules on financial reporting for all political parties. According to this provision, within the last six months of every year, all political parties must submit a detailed audited statement of accounts to the Electoral Commission (EC). The Act authorizes the EC to demand audited accounts from political parties and to appoint an EC-approved auditor to audit the accounts of political parties (Republic of Ghana 2000) also for the account of political parties to be audited by an auditor hired by the Commission. These accounts must give full details of the source of the party's funds, membership dues paid, contributions in cash or kind, properties owned by the party and when they were acquired (Republic of Ghana(k) 2000).

Notwithstanding these requirements, it is apparent that, generally, political parties have constantly failed to present their audited yearly accounts to the EC. For instance, since 1992, out of the 14 registered political parties as at 2010, only one (the Democratic Freedom Party) had consistently submitted their audited accounts (Dapatem 2011). It is evident that political parties do not play by the rules and the EC is handicapped in controlling the political parties and enforcing its own laws. Although the EC lacks the resources to properly audit the reports that parties submit, the potential enforcement of such laws could de-register the main political parties in Ghana—a complicated move that the EC would find difficult to implement (Dapatem 2011). Moreover, these legal restrictions, coupled with the inability of the EC to enforce the penalties stipulated in the Constitution, has emboldened many of these parties to continue seeking unorthodox means of financing.

Political Parties and Ethnicity

Political parties in Ghana are supposed to be organized at the national, regional, constituency and polling station levels. Article 55(7) of the Constitution stipulates that 'Every political party shall have a national

character, and membership shall not be based on ethnic, religious, regional or other sectional divisions'. And those parties must have offices in all the regions and at least two-thirds of the districts in Ghana. Likewise, Section 3(1) of the Political Parties Act of 2000 Act 574 maintains that no political party shall be formed '(a) on ethnic, gender, religion regional, professional or other sectional divisions; or (b) which uses words, slogans or symbols which could arouse ethnic, gender, religious, regional professional or other sectional divisions'.

Contrary to these constitutional provisions, political parties in Ghana are generally identified with one ethnic group or another. The argument that political parties with strong ethnic foundations in Ghana have been the ones that have maintained stronger voter turnout through the different Republics still remains valid (Lindberg and Morrison 2005). With the exception of the smaller parties, the two major political groupings, the NPP and the NDC, perform better in the Akan regions (namely Ashanti, Central, Brong Anafo, Eastern and Western regions) and the non-Akan regions (Volta, Northern, Upper West, Upper East and Greater Accra) respectively. These ethnic undercurrents are reflected in the voting patterns of the electorate (Aning and Lartey n.d.). The argument is that these ethnically motivated election results have an adverse effect on the democratic credentials of Ghana and portray a country that is highly polarized. The excessive use of ethnicity is even more pronounced in internal party democracy.[5] Yet another illegality associated with the behaviour of politicians is the use of ethnic rhetoric and sloganeering for election campaigns.[6] In effect, although there are legal and constitutional frameworks to govern the formation and funding of political parties, in practice the parties and politicians have deviated from them.

The inability of the EC to enforce its own rules on party formation and funding has provided some impetus for politicians to circumvent the process. The EC, together with the security agencies, must collaborate to enforce the laws as stipulated in the 1992 Constitution, the Electoral Commission Act 451 and the Political Parties Act 547. Compliance with these rules can be elicited through the political parties' advisory group IPAC (Inter-Party Advisory Committee). Additionally, the issue of state funding for political parties must be pursued to ensure a level playing field for all political parties in Ghana.

Transparency in Political Behaviour

The development of a legislative framework to regulate the activities of public office-holders has its genesis in the Public Office Holders (Declaration of Assets and Disqualification) Act of 1998 (Act 550) and Article 286 of the Constitution. These legal instruments are the singular most important requirements within the Constitution that hold public officers accountable and form part of the Code of Conduct for Public officials. Act 550 requires public office-holders[7] to submit a written declaration of the assets[8] they own, directly or indirectly, to the Auditor-General before taking office, at the end of every four years or at the end of their tenure of office. In the case of the Auditor-General (AG), whose responsibility it is to ensure transparency and accountability, the declaration should be made to the president.

The Commission of Human Rights and Administrative Justice (CHRAJ) is the legally mandated body tasked with investigating allegations of non-compliance and false declarations. Article 287 of the Constitution provides that, after investigation, the CHRAJ Commissioner may take any such action that is commensurate with the results of the investigations. Since 1992, CHRAJ has dealt with several high-profile cases involving political appointees. For example in the year 1995/1996, the Commission conducted investigations into allegations of corruption and illegal acquisition of assets against four ministers of state and some senior government officials. The Commission made adverse findings against three of the officials but the government at that time issued a White Paper challenging the Commission's findings. In response to the Commission's findings, the general public have been encouraged to report incidences of corruption, conflicts of interest and human rights abuses for redress.

Despite these constitutional requirements, the manner in which public officials, especially political appointees, approach the issue of assets declaration has been very lackadaisical (*Daily Graphic* 2009). The asset declaration process is not accessible to the public and therefore does not meet the requirement to be transparent and accountable. Worse still, the AG is not authorized to verify the authenticity of the declarations made by public officers (Ayamdoo 2005). To this end, public officials are able to hide their assets under the names of spouses, dependent children and family relations. The enforcement challenge facing Act 550 has been the inability of the law to proffer sanctions against public officials who violate the asset declaration process. In other words, there are no specific sanctions for violators of this constitutional provision. The law recommends the AG to notify CHRAJ of any public official who deliberately infringes constitutional requirements (Republic of Ghana(e) 1992). However,

even though public officials continue to flout this law, the AG is yet to officially notify CHRAJ of public officials who flout these constitutional provisions. The most the AG has done is issue a public warning to public officials.

Equally important is the issue of transparency in the appointment and selection of officials to public office. All appointments and selection of public office-holders are vested in the presidency (Gyimah-Boadi 2005). In the Ghanaian case, the binding powers of the Executive President are exemplified in the numerous appointments and promotions that the Constitution requires the president to approve. Article 70 of the 1992 Constitution has given exclusive powers to the president in appointing public officials. According to Article 70(1),

> the President shall, acting in consultation with the Council of State, appoint the Commissioner for Human Rights and Administrative Justice and his Deputies; the Auditor-General; the District Assemblies Common Fund Administrator; the Chairmen and other members of the Public Services Commission; the Lands Commissioner; the governing bodies of public corporations; a National Council for Higher Education howsoever described; and the holders of such other offices as may be prescribed by this Constitution or by any other law not inconsistent with this Constitution.

Additionally, Article 70(2) states that 'the President shall, acting on the advice of the Council of State, appoint the Chairman, Deputy Chairmen, and other members of the Electoral Commission'. Clearly, the president is required to exercise his appointing powers in consultation with the Council of State. The greatest challenge with this provision has been inconsistency in the constitutional provisions. On the one hand the president is given exclusive rights, while on the other hand the president is compelled to consult the Council of State. This inconsistency has given much power to the president and as a consequence most appointments are made without consultation with the Council of State. Moreover, because about 70 per cent of the members of the Council of State are appointees of the president, that institution has become nearly ineffective in fulfilling their role as stipulated in the Constitution.

Thus, the Constitution stipulates in Articles 78 and 242 that ministers of state and district chief executives must be appointed by the president with prior approval from parliament and not less than a two-thirds majority of members of the District Assembly (Republic of Ghana(d) 1992). However, the selection and appointment of political leaders to public office at the national, regional and district levels is fraught with a number of difficulties. First, almost all top

public appointments tend to be limited to members and affiliates of the ruling party. Second, nomination and subsequent appointment of most of these officials is based on the nominees' financial contribution to the incumbent party, ethnic background, cronyism, nepotism, patronage, and partisan consideration (Ayee 2008; Gyampo 2011). The issue of the competence, experience, merit and education of nominees to public office ranks very low in the selection criteria (*ibid.*) Third, even though the Constitution does not explicitly talk about vetting, parliamentary procedures require that ministers and their deputies are vetted before being approved (Republic of Ghana n.d.).

There are instances where nominees have been vetted by parliament and have been found to be unsuitable for public office yet parliament still approved these nominees and recommended that the president validate their appointments. For example, Mr Victor Smith, the former Ambassador to the Czech Republic, who was nominated by the president to become the new Eastern Regional Minister, told the appointments committee in parliament during his vetting that he lied about former president Kufuor's (then sitting president) involvement in a USD 5 million oil deal with a Kuwaiti magnate.[9] In spite of this revelation, although some members of parliament questioned Mr Smith's conduct, parliament still approved his nomination by a majority decision. There are more examples of rejection of presidential nominees for District Chief Executive (DCE) positions, yet presidents have over the years continued to present the same nominees for consideration until they are finally approved. The assembly members are usually induced with money, motorbikes, cloth, mobile phones and farming implements to push through the persons nominated by the president. For example, in May 2011 the president nominated a candidate for the position of District Chief Executive for the Shama District Assembly. The assembly rejected the president's nomination but in September of the same year the president re-nominated the same person for that position, flouting Standing Order 16(10) of the Local Government Administration which stipulates that the president must withdraw a nominee who fails to garner 50 per cent of the votes and must present a new one for consideration.

One pertinent issue, when discussing regulations concerning political behaviour, is the legislative framework on conflicts of interest. Article 284 of the 1992 Constitution states that a public officer shall not put himself in a position where his personal interest conflicts or is likely to conflict with the performance of the functions of his office. CHRAJ is the key institutional agent charged with investigating issues of conflicts of interest among public officials. The binding powers of the Commission, as stipulated in Section 8 of Act 456, are extensive, particularly in the enforcement of its decisions on

the issue of conflicts of interest. In terms of sanctions, however, there are no specific legal provisions for administering administrative, penal or civil sanctions against public officials who breach the law on conflict of interest. Moreover, the major reason for this loophole within the Constitution is the vague definition of what actually constitutes conflict of interest. Additionally, the Constitution is silent on the sanctions regimes, the procedures and mechanisms that CHRAJ can follow to respond to complaints of conflict of interest. This has negatively affected the capacity of the Commission to bring to book public officials who flout this provision. However, as indicated in Article 287 of the 1992 Constitution, the Commissioner of Human Rights and Administrative Justice and the Chief Justice have been mandated by the Constitution to investigate issues of conflict of interest as stipulated in the Code of Conduct for Public Officials, and to advise the executive to initiate sanctions. Incidentally, many of the corruption cases that CHRAJ has been inundated with arise from the conflict between public interest and private, professional or commercial interest (CHRAJ 2006).

Furthermore, most legislation regulating public appointments is embedded with clauses that require board members, who are mainly political appointees, to disclose their interests in the event of an unlikely conflict of interest. Unfortunately, more often than not, this is not done. Examples of such provisions include Section 6 of the Revenue Agencies (Governing) Board Act, 1998 (Act 558) that states that,

> (1) A member of the Board who is directly or indirectly interested in any matter being considered or dealt with by the Board shall disclose the nature of his interest at a meeting of the Board and shall not take part in any deliberation or decision of the Board with respect to the matter. (2) A member who fails to disclose his interest under subsection (1) of this section shall be removed from the Board.[10]

Furthermore, section 7(8) of the Social Security Law, 1991 (Republic of Ghana(c) 247) states that,

> Any member of the Board who has any interest in any company or undertaking with which the Trust proposes to make any contract or who has any interest in any contract which the Trust proposes to make shall disclose in writing to the Board the nature of his interest and shall, unless the Board otherwise directs, be disqualified from participating in the deliberations of the Board on the contract and shall in any case be disqualified from voting in any decision of the Board on such contract, and any member who infringes the provisions of this subsection shall be liable to be removed from the Board.[11]

Specifically, Article 285 of the 1992 Constitution prohibits serving appointees in public institutions from chairing the boards of such organizations at the same time: 'no person shall be appointed or act as the Chairman of the governing body of a public corporation or authority while he holds a position in the service of that corporation or authority'. Additionally, Article 222 of the 1992 Constitution states that 'the Commissioner and Deputy Commissioners of CHRAJ shall not hold any other public office'. Therefore, the position of the Commissioner of CHRAJ, Ms Lauretta Lamptey's, decision to hold two positions—the Commissioner of CHRAJ and board member of the Ghana Commercial Bank (GCB)—contrary to article 222 violates the Constitution. However, following incessant pressure from civil society groups, the Commissioner has since resigned from her position as a board member of GCB.

Political parties' code of conduct

Historically, the first ever code of conduct for political parties in Ghana was drafted in 2000 by the EC to guide the behaviour of politicians and political parties following intense competition between the two major political parties, the NDC and the NPP, in the run-up to the 2000 general elections. More recently, registered political parties, under the guidance of the Inter-Party Advisory Committee (IPAC) and the Institute of Economic Affairs (IEA), have spearheaded the development of similar codes of conduct for political parties and political actors (Van Gyampo 2008). These codes of conduct have been revised at every general election since 2000. Generally, the code encourages political parties and actors to uphold the integrity of the electioneering process by playing by the rules. The regulations include, but are not limited to, the following:

- discourages the use of defamatory, inflammatory and foul language, as well as provocative, derogatory and insulting language on political, religious and ethnic lines;
- is against the use of thugs to terrorize voters and create intimidation and an atmosphere of tension on polling day;
- detests fraudulently procuring results and votes by invasion and forcible occupation of polling stations by any unlawful means;
- enjoins parties to work together to ensure that stealing of ballot boxes and arson at voting centres are not employed by all stakeholders;
- is against the disruption, obstruction or breaking-up of rallies or meetings organized by other political parties or candidates;

- is against the abuse of incumbency; and
- is against all forms of electoral violence (IEA 2012).

Unfortunately, political parties do not abide by the codes of conduct to which they are themselves signatories. For instance, since 1992, incumbent parties have used state resources like vehicles for their campaigns. There has also been a worrying spike in the incessant use of abusive and inciteful language on political platforms, radio stations and campaign trails. Election violence has characterized almost all elections held since 1992. These irregularities smack of insincerity on the part of political parties/political actors in terms of upholding the rules of engagement. To ensure compliance with the code of conduct, a National Enforcement Body (NEB), which is made up of 13 members with representation from all political parties, is mandated to monitor, reprimand, sanction and alert state institutions and security agencies of any political party/politician that breaches the code of conduct (IEA 2012). It is fair to argue that the sanctions for 'naming and shaming'—reprimands and an undertaking by the offending parties not to repeat the offence, the strongest measures available to the NEB—are in practice not punitive enough.

The enforcement deficiency within this code rests in the inability of the Inter-Party Monitoring Committee (IPMC) to uphold to the letter the provisions in the code and in the lack of respect and trust among political players in the country. Furthermore, the establishment of the national and regional enforcement bodies to oversee the behaviour of political parties/politicians does not in itself empower the NEB to deal swiftly with transgressors at a national level. In a real sense, the enforcement mechanisms laid down in these codes of conduct do not have what it takes to elicit compliance from political parties and their actors (Van Gyampo 2008). For instance, although the code is against the abuse of incumbency in electioneering, this has occurred in all elections since 1992—a phenomenon that NEB has not been able to address (Azeem 2012). Additionally, acts of violence and thuggery instigated by party supporters with the tacit approval of some political parties in most electioneering processes go unsanctioned.

For instance, the 2012 biometric registration was characterized by the issue of threats and counter-threats to political opponents, violence and the use of thugs—'machomen'—to intimidate, harass and beat eligible citizens and election officials. For example, the NPP parliamentary candidate for Ablekuma South, Madam Ursula Owusu, was beaten up by thugs suspected of being members of the ruling NDC at Odododiodio Constituency during the biometric registration process in May 2012 (Gyasiwaa 2012). To date,

the perpetrators of the crime have not been arrested. Also, there was an overwhelming use of inciteful and intemperate language throughout the country. Most of the perpetrators went unpunished. Table 2 (Annex) shows some of the inflammatory and inciteful language used. Although political parties have undertaken to broaden publicity for the code, more often than not political party activists are not aware of the rules, sanctioning mechanisms or enforcement regimes within the code of conduct.

Protection of whistleblowers

After several years of democratic rule, the Whistleblowers Act of 2006 (Act 720) was enacted as an essential part of an anti-corruption legislative framework to encourage and support individuals to 'blow the whistle' on the unlawful conduct or corrupt practices of public officials and private individuals. Furthermore, the Whistleblowers Act not only includes measures against corruption, but also such that will support rule of law, encourage good public ethics and general safeguarding of the public interest (Domfeh and Bawole 2011; Ghana Anti-Corruption Coalition 2010). Act 720 empowers ordinary citizens to disclose any act of impropriety, be it economic crime, miscarriage of justice, misappropriation or mismanagement of public funds, environmental degradation, or danger to the health or safety of individuals or a community, without any fear of victimization (Republic of Ghana(m) 2006). The existing channels for the implementation of the Whistleblowers Act are clearly spelt out in Section 3(1) of Act 720. Section 3(1) of the Whistleblowers Act states that,

> Disclosure of impropriety may be made to anyone or more of the following: an employer of the whistleblower, a police officer, the Attorney-General, the Auditor-General, a staff of the Intelligence Agencies, a member of Parliament, the Serious Fraud Office, the Commission on Human Rights and Administrative Justice, the National Media Commission, the Narcotic Control Board, a chief, the head or an elder of the family of the whistleblower, a head of a recognized religious body, a member of a District Assembly, a Minister of State, the Office of the President, the Revenue Agencies Governing Board or a District Chief Executive.

As regards the role and binding powers of the Whistleblowers Act in Ghana, the Act enumerates the actions to be taken when an impropriety is disclosed to bodies cited in Section 3(1). Accordingly, Section 6(1) of the Whistleblowers Act states that, 'when a disclosure of impropriety is made to a person specified

in Section 3, the person shall *(a)* make a record of the time and place where the disclosure is made, *(b)* give to the whistleblower an acknowledgment in writing of receipt of the disclosure, and *(c)* keep the writing in which the disclosure is made confidential and in safe custody pending investigation of the impropriety'.

Furthermore Section 6(2) states that, 'where the disclosure is made to a chief, head of a recognized religious body or a head or an elder of a family, the chief, head or elder may instead of recording the disclosure as required under subsection (1), assist the whistleblower to make the disclosure to the police or to some other authority specified in section 3(1)'.

Undoubtedly, the greatest enforcement challenge with the Whistleblowers Act is the administrative and political victimization of whistleblowers. To address the core issue of victimization, Act 720 makes provision for complaints to be filed and has imbued the CHRAJ with High Court powers to enforce its judgements (Republic of Ghana(m) 2006). Additionally, whistleblowers can seek protection from the police, legal assistance, and protection against administrative, civil and criminal actions (Republic of Ghana(m) 2006). However, available evidence suggests that nearly 90 per cent of the whistleblowers in Ghana lost their job, savings, home and entire family (Bossman 2008). In addition, whistleblowers have over the years suffered interdiction, suspension, dismissal, harassment, threats, assault and forced transfer.[12] Given that most of the heads of the institutions that whistleblowers can report to are either politicians or political appointees, the sanctions as stipulated in the law are often abused without recourse to any action.[13] In this sense, it appears that the legislative framework that serves to protect the interests of whistleblowers in Section 12(2) of Act 720 is constantly being grossly violated.

Consequently, there are a number of ancillary weaknesses identified within the Whistleblowers Act that political parties and politicians exploit to their advantage. In the first place, there is the lack of informant protection law to guard against unfair treatment and protect the confidentiality of informants who 'blow the whistle' (Bossman 2008). Second, parliament has shown a lack of urgency in passing the right to information bill to grant whistleblowers access to information. This is exemplified in Mr Cletus Avoka's (majority leader) public statement on the passage of the right to information bill not being a parliamentary priority (Ayuuresyisiya and Nartey 2012). Third, the lack of clarity in the law regarding the inclusion of officials from public and private institutions and the point at which disclosures cease to be confidential are others loopholes. Fourth, the lack of coordination among institutions tasked with receiving and investigating complaints from whistleblowers has

weakened their effectiveness. Finally, adding to these dynamics, the greatest loophole in this Act derives from its inability to guarantee anonymous disclosures since most whistleblowers would not want to be identified.

Bribery and Corruption

Chapter 18 of the 1992 Constitution, the Commission of Human Rights and Administrative Justice Act, (Act 456) of 1993 and Sections 239, 244, 245 and 250 of the Criminal Offences Act, 1960 (Act 29) provide the legislative framework for controlling bribery and corruption among public officials. Additionally, in 2005 Ghana ratified the African Union (AU) and the United Nations conventions against corruption as well as the ECOWAS (Economic Community of West African States) protocol on corruption. Since coming into force, the CHRAJ has devoted much effort to dealing with the issue of corruption among political appointees in the public sector. The functions of the Commission are stipulated in Section 7(1) of Act 456 and Section 218(a) of the 1992 Constitution.[14] The implementation capacity and binding powers of the Commission are spelt out in the broad mandate that requires the Commission to be a national human rights institution, an ombudsman agency tasked with promoting administrative justice, and an anti-corruption agency that is more or less an ethics office for public service workers. Table 1 highlights the trends in cases that CHRAJ has received since 2004, the percentage change over the next six years and the percentage of cases that were successfully settled.

Table 1. Cases reported to CHRAJ from 2004 to 2009

Category	2004	2005	2006	2007	2008	2009	% change (-/+)
Administrative justice[15]	1 671	1 622	1 546	1 303	1 460	1 143	8.4
Human rights[16]	13 249	13 844	11 999	12 045	11 323	11 176	20.7
Corruption	33	283	386	107	136	124	-0.9
Total	14 953	15 749	13 931	13 455	12 919	12 443	25.1
Percentage of cases settled	81.0	79.0	87.8	81.8	75.0	74.8	-

Source: CHRAJ, 2009

Notwithstanding the binding powers of the Commission, there are limitations to the Commission's implementation capacity. Primarily, the Commission cannot investigate a matter pending before a law court or judicial tribunal. Additionally, the Commission cannot investigate cases involving relations between the government and other governments or international organizations. The Commission also cannot investigate any issue relating to the exercise of the prerogative of mercy (CHRAJ 2009). These are bottlenecks that hamper the Commission's efforts. The main enforcement challenge of the Commission relates to the difficulties encountered in the effective performance of its functions. First, although CHRAJ has the powers to investigate all allegations of corruption, its inability to enforce its decisions without recourse to the traditional courts serves as a disincentive and a limitation to the proper functioning of the Commission.

Furthermore, the constitutional provision that requires the Commission to report its findings and recommendations to the politically appointed Minister of Justice and Attorney-General limits the enforcement authority of the Commission.[17] There are instances where, as a result of this provision, governments have ignored the findings of the anti-corruption agencies and have failed to take any action, especially when it would expose a member of their own political party.[18] Second, the financial dependence of the Commission on the Executive (Ministry of Finance and Economic Planning) has restricted its autonomy and effectiveness, particularly in the performance of its constitutional mandate. Third, there are so many items of legislation (about 18) dealing with the issue of corruption in Ghana, and they are so narrowly defined, that it has become very difficult for the Commission to broadly capture the issue of corruption in order to deal swiftly with the issue (CHRAJ 2009).

Public procurements

In 2003, Ghana passed the Public Procurements Act (Act 663) to complement other constitutional provisions and also in response to the lack of transparency in the award of contracts in public institutions. Overall, the argument has been that most of the fraudulent activities that take place in public institutions are perpetrated through procurement (Agambila 2003). Therefore the purpose of this Act is to provide legal and procedural guidelines for best practice in procurement to secure value for money. If one examines the core of the Public Procurement Act, it is quite clear that the Act defines the obligation of public servants in the procurement process. The law advocates the preparation of a procurement plan in addition to an open competitive tendering process

(Republic of Ghana(l) 2003). The procurement process requires suppliers, contractors and consultants to compete for business in a fair and impartial environment. Moreover, the guiding principles to public officials associated with the procurement process, are their responsibilities to protect integrity, fairness and openness in the treatment of all who supply goods and services to government.[19]

Act 663 requires public servants involved in procurement to follow the codes of conduct for public officials as stipulated in Section 85 of the 1992 Constitution as well as the 1999 Civil Service Code of Conduct. However, it has become evident in the Ghanaian case that stringent adherence to procedures alone cannot create an ethical and accountable procurement process. Procurement processes in Ghana are saddled with political interference at the national, regional and district levels (World Bank 2003). Additionally, the constitutional provision that allows for single-source procurement as illustrated in Sections 40 and 41 of Act 663 has provided opportunities for fraud. A key challenge for the enforcement of penalties stipulated under Section 92 of Act 663 for especially errant politicians who abuse the process is that criminal liability under Section 92 is dependent on summary conviction resulting from prosecution in court. Furthermore, the disjointed and rigid bidding and tendering process has allowed politicians and political parties to exploit and manipulate the process. This is further exemplified in the hurried manner in which politicians and political actors queue up at the Registrar-General Department to form new companies the moment their party gains power.

More significantly, Section 92 of Act 663 recommends sanctions for offences committed under the Act. According to section 92(1), 'Any person who contravenes any provision of this Act commits an offence and where no penalty has been provided for the offence, the person is liable on summary conviction to a fine not exceeding 1000 penalty units or a term of imprisonment not exceeding five years or to both'.

The challenge with the provisions within this section is the fact that the section appears to combine administrative, penal and criminal issues together. The law needs to disaggregate administrative and penal issues from criminal issues and allow the criminal laws to deal with any criminality associated with procurement.

Money laundering

In this section we will link Ghana's Anti-Money Laundering Act with the illicit narcotics trade since, apart from financing terrorism, money laundering has very strong connections with illegal drugs. In retrospect, until the enactment of Ghana's Anti-Money Laundering Act (Act 749) in 2008, domestic efforts at reducing money laundering relied heavily on Section 12 of the Narcotic Drug (Control) Enforcement and Sanctions Law, 1990 (Republic of Ghana(b) 1990). Accordingly, PNDCL 236 states that 'no person should without lawful authority undertake any activity for the purpose of establishing or promoting any enterprise relating to narcotic drugs'. Furthermore, 'any person who commits an offence under this section, if found guilty, is liable on conviction to a term of imprisonment of not less than 10 years'. However, demands for a single law to deal with money laundering followed the passing of United Nations Security Council Resolution 1617. Additionally, the PNDCL 236 that already existed was perceived as weak, considering the sophisticated nature that money laundering in Ghana had assumed. Ghana's Anti-Money Laundering Act 2008 (Act 749) is in accordance with standards recognized by the Financial Action Task Force (FATF) and ECOWAS Groupe Intergouvernmental d'Action contre le Blanchiment d'Argent en Afrique dei'Ouest (GIABA). Moreover, other local instruments, such as the Non-Bank Financial Institutions Act, 2008 (Act 774), prohibit non-bank financial institutions from transacting any business with suspected money launderers. The complicity of some politicians in the drugs trade has further increased the amount of laundered money circulating within the economy, especially during election years. These illegal donations and fundraising activities overly benefit a few private individuals and generally destabilize the economy.

Act 749 provides a legal basis for investigating, criminalizing and prosecuting money laundering, as well as ensuring compliance with international money laundering provisions. Section 1(1) of Act 749 states that, 'A person commits an offence of money laundering if the person knows or ought to have known that property is or forms part of the proceeds of unlawful activity and the person: (a) converts, conceals, disguises or transfers the property, (b) conceals or disguises the unlawful origin of the property, or (c) acquires, uses or takes possession of the property'.

Section 2 of Act 749 further states that 'unlawful activity means conduct which constitutes a serious offence, financing of a terrorist act or contravention of a law which occurs after the commencement of this Act whether the conduct occurs in this country or elsewhere'.

Since the passage of the Anti-Money Laundering Act in 2008 the Bank of Ghana has pursued a number of internal initiatives to meet international standards with respect to anti-money laundering and combating the financing of terrorism. These include the development of a National Strategy and Action Plan, the creation of an Anti-Money Laundering Unit at the Bank of Ghana and the establishment of the Financial Intelligence Centre (FIC) (Dogbevi 2012). Institutionally, the Central Bank has the regulatory authority to deal with money laundering through its policy direction and oversight responsibility over the banks and financial institutions within the country.

However, the major difficulty in dealing with money laundering in Ghana is the inability of other government institutions, like the security agencies, to complement the role of the Central Bank in fighting money laundering in non-financial institutional areas. For example the increasing incidence of drug trafficking in Ghana and the inability of the security agencies to control it have introduced laundered funds into the economy. Another implementation challenge is the inability of the Central Bank to demand compliance from commercial banks to adhere to customer due diligence requirements consistent with the recommendations of the FATF. For instance, the Financial Intelligence Center (FIC) created under Section 4 of Act 749, is authorized to receive reports on suspicious financial transactions from banks, but the FIC has not been given any powers to investigate these commercial banks once fraud is suspected. Moreover, the entire work of the FIC is confidential and their operations are not known to the general public. Furthermore, the unconventional avenues used to launder money, such as the real estate industry and car dealerships, have gone beyond the operational reach of the Central Bank (*Ghana News Agency* 2011).

On the other hand, the Narcotic Drugs (Control, Enforcement and Sanctions) Act, 1990 (Republic of Ghana (b) 1990) established the Narcotics Control Board (NACOB), with the mandate to prosecute money laundering offences related to illicit traffic in narcotic drugs and psychotropic substances. However, the binding powers of the NACOB are limited to the prevention of money laundering specifically in these activities. The law on anti-money laundering is not therefore sufficiently wide-ranging considering the fact that Ghana is a mainly cash-based economy with dominant semi-formal and informal sectors. Also, the classification of drug-related money laundering offences under the Narcotic Drugs Act does not cover all the salient features of money laundering that have been stipulated in the Anti-Money Laundering Act. Furthermore, the sanctioning regime under Act 749 is not punitive enough to elicit compliance with the Act.

The lack of synergy between the security agencies, financial and non-financial institutions has created a loophole that money launderers have exploited. The penalty for money laundering as stipulated in Section 3 of Act 749[20] has been found to be less than punitive. Overall, the sanctioning regimes stipulated are not robust enough and conflict with international legal requirements such as those specified in FATF regulations. According to the FATF regulations, money laundering offenders should be put on trial as a separate crime; however, the sanction in Act 749 runs contrary to that provision. Perhaps these implementation deficiencies could explain FATF's decision to downgrade Ghana. The outdated nature of some of the provisions under the narcotics law also explains why prosecuting money laundering cases has not been very successful (GIABA 2009). This results from the inability of investigators to access drug traffickers' bank accounts in order to obtain financial statements and intelligence that will implicate them and secure court convictions. There must be a second look at the laws, for example the one that looks at how to confiscate the assets of offenders. This would reinforce the desire of the country to weed out drug-related laundered funds.

Conclusion

This paper has focused on contextualizing the current legal, policy and operational frameworks that regulate the behaviour of politicians (elected or appointed) and political parties in Ghana. It also identified the loopholes, implementation capacity, enforcement mechanisms and sanctioning regimes within the laws and policies. The challenges associated with the behaviour of politicians and political parties are multiple and complex. These behaviours are demonstrated in areas such as political party formation and financing, politics and ethnicity, political parties' codes of conduct and transparency in political conduct. Political parties' activities continue to revolve around individuals and do not exhibit the democratic ideals of participation, plurality and free choice as stipulated in the Constitution. The Electoral Commission, which has the mandate to oversee the activities of these parties and their actors, is handicapped in enforcing its powers and eliciting compliance from the political elites. Additionally, because of political interference, most state institutions do not have the capacity to sanction politicians (elected or appointed) and political parties who violate the constitutional provisions for public office-holders. Such deficiencies are exemplified in cases such as money laundering, bribery and corruption, conflict of interest and public procurements.

It is important, moving forward, to demand that state institutions develop their capacity to enforce to the letter the binding powers given them by the 1992 Constitution. Strengthening the state institutions that investigate and prosecute cases relating to corruption must be high on the agenda of any government that assumes power in Ghana. This is the only definite means by which political actors (elected or appointed) could be held accountable for their actions.

ENDNOTES

1 The following acts and instruments clearly stipulate the functions of the Electoral commissions.

(a) Republic of Ghana(h), 1993 (Act 451)

(b) Republic of Ghana(k), 2000 (Act 574)

(c) Rebublic of Ghana(i), 1993 (Act 462).

2 Nkoransa North Constituency is in the Brong Ahafo Region of Ghana.

3 See 'Drug money "tainting" Ghana polls', BBC News, 28 October 2008, <http://news.bbc.co.uk/2/hi/africa/769581.stm> [accessed 24 September 2012]; 'NACOB Boss Clarifies "Cocaine Politics" Comments', Peacefmonline.com News, June 27 2012, <http://news.peacefmonline.com/tools/printnews/news.php?contentid=121034> [accessed 24 September 2012]

4 See, 'Asiedu Nketia mocks NPP over alleged $20m NDC mansion', Myjoyonline.com News, 20 December 2011, <http://politics.myjoyonline.com/tgpolitics/print/index.php?url=http://politics.myjoyonline.com/pages/news/201112/78642.php&contentid=78642> [accessed 4 July 2012]

5 For example since 1996, the NPP have chosen an Akan as the flag-bearer, and opted for a regional, ethnic and religious balance by choosing a northerner and a Muslim for a running mate. Similarly in the case of the NDC, since 2000 the party has opted for an ethnic balance similar to that of the NPP, choosing a northerner as the running mate for their flag-bearer.

6 For example, the NPP flag-bearer, in a statement to urge party followers to be courageous in the face of intimidation from their opponents used the words 'Yɛn Akanfo', to whit, 'We Akans' to galvanize support from the majority ethnic base of the party followers. On the other hand, in the 2008 elections the NDC had an electioneering slogan that read 'Adze wo fie oye', or 'it is better to follow your kinsman'.

7 Including the President, the Vice President, the Speaker, Deputy Speakers, Members of Parliament, Ministers of State and their deputies, Chief Justice, Justice of the Superior Court of Judicature, chairmen of regional tribunals, the Commissioner for Human Rights and Administrative Justice and his deputies, all judicial officers, ambassadors or high commissioners, Secretary to the Cabinet, heads of ministries or government departments or equivalent officers in the civil service, chairmen, managing directors, general managers and departmental heads of public corporations or companies in which the state has a controlling interest; and any other public institution as parliament may prescribe.

8 Assets required to be declared under the Act include land, buildings, farms, concessions, vehicles, plant and machinery, fishing boats, trawlers, generating plants and property in which the officer has beneficial interest, business interests, securities and bank balances, and treasury bills, life and other insurance policies, jewellery and art objects worth GH¢500 (Ghanaian Cedi) and above).

9 See, Victor Sings at Vetting says $5 million allegation against Kufuor was a lie, Peacefmonline.com News, 20 March 2012, <http://elections.peacefmonline.com/tools/printnews/news.php?contentid=102489> [accessed 2 July 2012]

10 See also Sections 205–207 of the Companies Code Act, 1963 (Act 179) (Republic of Ghana(a))

11 See also Section 88 of the Civil Service Law, 1993 (PNDCL 327) (Republic of Ghana(f))

12 For example, in March 2009 the Chief Director and the Principal Accountant of the Ministry of Youth and Sports blew the whistle on the misappropriation of state funds by the sector Minister of Youth and Sports. These whistleblowers were victimized first by interdicted, summarily dismissed and surcharged with USD20,000—an amount said to have been lost to the state as a result of the Chief Director's negligence. The victims went to court as stipulated under Section 15 and the court ordered their reinstatement and the payment of their full salaries when they were interdicted.

[13] Section 6(3) of Act 720 states that 'Where a person to whom the disclosure is made fails to keep confidential the disclosure, the person commits an offence and is liable on summary conviction to a fine of not less than five hundred penalty units and not more than one thousand penalty units or to a term of imprisonment of not less than two years and not more than four years or to both'.

[14] CHRAJ is tasked to investigate complaints of fundamental human rights and freedoms, injustice, corruption, abuse of power and unfair treatment of any person by a public officer in the exercise of his official duties.

[15] Administrative justice cases involve complaints of dismissal, abuse of office, termination of appointment, undue pension delay/gratuity, among others.

[16] Human rights cases involve complaints involving women, children and property rights.

[17] Section 18 of the Commission for Human Rights and Administrative Justice Act (Act 456) provides that after arriving at a decision on an issue, the Commission should submit its report, including its findings and recommendations to the appropriate person, minister, department or authority concerned, with a copy to the complainant. If after three months the recommendations are not enforced, the Commissioner may bring an action before any court and seek remedy as may be appropriate for an enforcement of its decision.

[18] For example in 1996, CHRAJ made adverse findings against top government officials but the government refused to sanction those appointees who were implicated in their findings and the Commission could not enforce its recommendations.

[19] Manuals—Public Procurement Act, 2003 (Act 663), Section 286(5) of the 1992 Constitution specifically identifies the main target groups to provide leadership in the procurement process. These are the President, heads of ministries or government departments, chairmen, managing directors and general managers of public corporations or enterprises in which the state has a controlling interest.

[20] According to Section 3 of Act 749, 'A person who contravenes section 1 or 2 commits an offence and is liable on summary conviction to a fine of not more than five thousand penalty units or to a term of imprisonment of not less than twelve months and not more than ten years or to both'.

ANNEX

Table 2: Language and statements by politicians

NO	STATEMENT	DECLARER/ AFFILIATED POLITICAL PARTY	DATE REPORTED	REPORTING NEWS AGENCY
1.	'All-die-be-die'.	Nana Akufo-Addo (NPP flag-bearer)	10 February 2011	Citifmonline.com
2.	Baba Jamal declares 'Jihad'.	Baba Jamal (Deputy Minister for Tourism, NDC)	14 August 2009	*Daily Guide*
3.	'If the NDC wants to destroy the process, we would aid them in doing so… if you dress up anybody in fake police outfit and present him, we will lynch him. If you dress up anybody in fake military attire, we will lynch him. This is war… Yes! I declare war today'.	Kennedy Agyapong (NPP MP for Assin North)	17 April 2012	Peacefmonline.com
4.	'Rawlings would end up like Gaddafi if he continues to support NPP'.	Alhaji Iddrisu Bature (editor-in-chief, Al Haji newspaper/NDC Social Commentator)	26 October 2011	*Ghanaian Chronicle*
5.	'The whole nation would be engulfed in hellish inferno if one hair of Rawlings is lost'.	Victor Smith (Eastern Regional Minister, NDC)	17 September 2008	*Daily Guide*
6.	Nana Akufo-Addo is an 'untidy man' and a 'fruitcake' (madman).	Kobby Acheampong (NDC Deputy Minister of Interior)	22 March 2011	*Daily Guide*
7.	Paul Collins Appiah-Ofori is a 'bed-wetter'.	Bernard Allotey Jacobs (NDC Central Region, Communications Director)	21 February 2012	Peacefmonline.com
8.	Michael Teye Nyaunu is a 'Dudui' (a leftover) element.	Stan Dogbe (Presidential Aide, NDC)	9 July 2011	Citifmonline.com
9.	Ursula Owusu is a 'disgrace to womanhood'.	Dr Hannah Bissiw (Deputy Minister,Water Resources, Works and Housing, NDC)	21 March 2011	*Daily Guide*
10.	President Atta Mills is a 'sheep' who behaved sheepishly	Francis Annoh-Dompreh (NPP Eastern Regional Youth organizer)	19 May 2011	*Daily Guide*
11.	Nana Akufo-Addo is a serial smoker who smokes like a 'rat'.	Justine Ampofo (NDC)	19 May 2011	*Daily Guide*
12.	President Mills is the 'lousiest president Ghana has ever had'	Ursula Owusu (NPP activist)	14 September 2011	Myjoyonline.com

Source: Complied by Danso, S.O. and Edu-afful, F. (2012)

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About the Authors

Kwesi Aning: Director, Faculty of Academic Affairs and Research (FAAR), KAIPTC and Professor of Peacekeeping Practice, Kennesaw State University.

Fiifi Edu-Afful: Research Fellow with the Conflict, Peace and Security Programme at FAAR, the Kofi Annan International Peacekeeping Training Centre (KAIPTC) Accra, Ghana. He is presently a doctoral candidate at the University of Ibadan, Nigeria.

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