## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
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<tr>
<td>Ghana</td>
<td>P164665</td>
<td>Ghana Public Sector Reform for Results Project</td>
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<th>Financing Instrument</th>
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<th>Implementing Agency</th>
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<tr>
<td>Investment Project Financing</td>
<td>Ministry of Finance</td>
<td>Office of the Senior Minister</td>
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### Proposed Development Objective(s)

The objective of the project is to improve, for Selected Entities, efficiency and accountability in the delivery of selected services.

### Components

- Strengthening Organizational Performance
- Improving Monitoring and Evaluation
- Improving Efficiency, Accountability and Citizen Engagement in Delivery of Selected Services
- Project Management, Coordination and Public Reporting
- Unallocated

## PROJECT FINANCING DATA (US$, Millions)

### SUMMARY

<table>
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<th>Total Project Cost</th>
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<td>Total Financing</td>
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<td>of which IBRD/IDA</td>
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### DETAILS

**World Bank Group Financing**

| International Development Association (IDA) | 30.00 |
B. Introduction and Context

Country Context

1. **The Republic of Ghana is a Lower Middle Income (LMIC) country in West Africa.** With a population of approximately 30 million, it is considered among the most peaceful and democratic countries in Sub-Saharan Africa. GDP growth was approximately four percent for 2016, and the current account deficit narrowed to about seven percent of GDP in 2016 from eight percent the previous year. Ghana held its last presidential and parliamentary elections on December 7, 2016, which ushered in a government formed by the New Patriotic Party (NPP), under the leadership of President Nana Addo Dankwa Akufo-Addo. The NPP government came to power with promises which include, inter-alia, macro-economic reforms, improving service delivery and strengthening private sector development.

2. **Ghana has made remarkable progress in poverty reduction in the last two decades.** In 1991, 53 percent of the population lived below the poverty line.\(^1\) By 2012, only one quarter of Ghanaians lived below the poverty line—cutting Ghana’s early-1990’s poverty rate. Ghana thus achieved its Millennium Development Goal of reducing its poverty rate\(^2\) by half, from 47.4 percent to 13.6 percent during 1991–2012. Sustained, robust economic growth, broadly shared, has been a major factor in the reduction of poverty, but structural transformation, including the increasing shares of services and industry in the economy have also contributed. Starting higher than the mean for LMICs, Ghana’s poverty headcount is today lower than the current LMIC average of 18.3 percent. However, poverty reduction patterns have also exposed regional inequalities in Ghana, as poverty still is most heavily concentrated in rural areas and in the country’s northern regions. For example, the number of poor increased in Volta, Northern and Upper West regions, while it declined in other regions.\(^3\)

3. **Despite Ghana’s economic growth, institutional quality and government effectiveness have declined in the past two decades, undermining the state’s ability to provide the requisite support for transformation.** Institutional reforms designed to promote economic development, strengthen the

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\(^1\) World Bank, Poverty Reduction in Ghana: Progress and Challenges, 2015.
\(^2\) Share of people with consumption valued under US$1.90 per day.
investment climate and improve the quality of public management have generally been undermined by weak policy coordination and implementation. Reforms - for example, to improve public sector performance and service delivery, introduce service standards, shared services, or decentralization - have not been fully implemented. In the process, important projects have not been completed; important policies not fully implemented; and plans for new ones, though grounded in immense optimism, are often dropped with changes in administrations. The result: despite a favorable and stable environment, democratic consolidation, and human resource capacity, structural transformation has eluded Ghana. Ghana is still in a low-level equilibrium: experiencing marginal economic growth amid persistent horizontal inequalities, repeated economic volatility and low levels of private sector participation. To ensure economic growth and transformation Ghana needs to focus on tackling the institutional deficiencies that undermine delivery of key public services. This could include ensuring efficiency and accountability in delivery of key public services and strengthening monitoring and evaluation.

4. The Government has proposed several strategic plans to deal with some of these challenges. The 2018-2023 National Public Sector Reform Strategy (NPSRS) was publicly launched by the President on August 8, 2018. The NPSRS, which this project supports, is one of several strategic plans the Government has prepared in recent times. The NPSRS will guide the Government’s public sector reform agenda through its six pillars: Citizens- and Private Sector-Focused Public Sector; Capable and Disciplined Work Force; Strengthened Public Sector Regulatory Framework; Modernized and Improved Work Condition; Strengthened Local Governance Structures, and Digitized Public Sector Services and Systems. While this remains an ambitious strategy for a five-year term, its coverage is simple and based on the understanding that a strong and effective public sector is critical for Ghana’s transformation.

5. Ghana’s 2017 budget outturn had a revenue shortfall of 0.7 percent of Gross Domestic Product (GDP), with non-tax revenues lower than targeted by 0.6 percent of GDP. As a result, the authorities limited expenditures to match the lower revenues: goods and services expenditures were constrained, clearance of arrears was lower than envisaged, and transfers to other government units were low. A May 2018 report of the Auditor General (AG) of Ghana on arrears and unpaid claims as of end-2016 stated that out of claims worth over GHc 11 billion, only GHc 6.3 billion could be validated. This will impact, to varying degrees, all MDAs proposed to be covered by the project, as the AG and government undertake remedial actions in coming years to strengthen accountability. In addition, the Government plans to mobilize significant revenues during and after fiscal 2019, and clear all arrears by 2021. These factors need to be considered in finalizing project objectives, design, results targets, and activities.

Sectoral and Institutional Context

6. The public sector in Ghana is vast and complex. It consists of the four categories of public services listed under Chapter 14 (Article 190 Section 1a-d) of the 1992 Constitution stipulating that public services of Ghana shall include civil service and other 13 services, public corporation, and other public services

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5 See, for example, the May 2018 IMF documents, accessible at: https://www.imf.org/en/Publications/CR/Issues/2018/05/02/Ghana-Fifth-and-Sixth-Reviews-Under-the-Extended-Credit-Facility-Request-for-Waivers-for-45841
constituted by law. Details are prescribed in the Public Services Commission Act 1994 and Civil Service Law 1993, and can be interpreted to include commercial state-owned enterprises (SOEs) and regulatory organizations including commissions, boards, agencies, subvented agencies, statutory corporations, and joint ventures with government carried interest. The complexity is compounded by the diversity of functions and different nomenclatures for various organizations with different conditions of service.

7. **Successive governments have recognized that poor public sector performance undermined economic growth in Ghana.** For instance, the Senchi National Economic Forum of 2014 expressed dissatisfaction that civil and public servants display a lackadaisical attitude toward the work they do.”

There is evidence of poor institutional capacity of Ministries, Departments and Agencies (MDAs) to formulate and implement policies for enhanced service delivery to the citizens. In Ghana, development plans and programs have a very poor record of implementation. Many people feel concerned about the waste of manpower and resources in formulating plans and programs that are not likely to be implemented.”

Two of the major causes for the failure of past anti-corruption strategies in Ghana are lack of effective and sustained coordination, and insufficient government commitment to, and limited support for, the implementation of anti-corruption strategies. Furthermore, limited coordination between sector MDAs emphasizes the point that “one of the problems identified as a cause of failure of past programs is individual Ministry led programs with … few common linkages”.

8. **Previous attempts at improving public sector performance have been expansive, covering all facets of the public sector—with only modest results.** The Government’s new approach elaborated in the NPSRS focuses on a selected number of areas designed to focus on “responsiveness; quality; and adaptability.” This strategy is designed to address specific constraints to public sector performance over the next five years. The NPSRS compliments other government strategic documents including the National Coordinated Program for Economic and Social Development Policies (2017-2024); Medium-Term Policy Framework (MTPF), 2018-2021 and the Government Result Framework (GRF), 2017-2020. All these key government documents outline some measures aimed at improving public sector performance. The Bank’s engagement supports these reforms in performance; measurement of efficiency and accountability in service delivery, strengthening the monitoring and evaluations systems; and improving administrative service delivery, by tackling the key governance constraints to the effective delivery of administrative services. The three areas represent the most challenging aspects of public sector performance in Ghana today namely: performance, accountability, and service delivery.

9. **A fundamental problem of Ghana’s public sector is how to convert broad aspirations contained in strategic plans and government pronouncements into tangible outputs and outcomes that show results and impact.** The gap between what government proposes as outlined in several strategic documents and what it manages to accomplish can be explained by the ineffectiveness of public sector

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8 John Agyekum Kufuor, last State of the Nation Address delivered to Parliament on January 5, 2009, before he left office.


Because of a weak organizational drive for performance, the absence of a results culture and capacity for monitoring at the upstream (center of government) level, Ghana has lost many opportunities to improve the delivery of public services to citizens. The public sector cannot support the expansion of the private sector, improved public financial management and, most importantly, trust in government. The upshot: a deterioration in government effectiveness and overall quality of public administration contributing to low growth. Key constraints to improving efficiency and accountability include insufficient public reporting and feedback on agency service delivery standards and performance, challenges in timely budget releases for goods and services, archaic business processes, fragmentation of information systems, lack of inter-agency coordination, and – in some cases – high staff turnover.

10. **Weaknesses in central agencies’ effectiveness have not only affected the performance of these agencies alone.** These weaknesses have also affected the ability of parent ministries to give strategic guidance and leadership to the agencies under their remit to deliver overall ministry goals. These weaknesses are noticeable in delays in the preparation of administrative permits or issuance of passports; in the monitoring of performance targets and evidence gathering to inform design and execution of economic policies; and weak delivery of public services at central and local levels. To reverse its performance, Ghana’s public sector institutions must put in place measures to improve organizational performance challenges—addressing “people issues” that broadly involve how staff perceive their roles in the organization and how it contributed to the mission as well as functional issues related to the delivery of the MDAs’ mandates—by establishing a culture of monitoring and evaluating performance and holding agencies accountable for improved delivery of administrative services.

11. **Ghana’s public sector faces an “organizational performance” problem.** Despite the availability of a performance appraisal system, there is a disconnect between the formal structures of managing performance—which exist—and the functional usage of these structures to drive performance and deliver results. In the absence of a strict adherence to a system for performance management at the organizational level, it is difficult to keep government institutions focused on delivering short and medium-term goals. Across the public sector, various MDAs have general statements of vision and goals. However, either because of low capacity or inadequate resources, there is little follow through to mobilize the internal organizational resources (financial and human) to deliver. For instance, in a recent survey of the public service, 77 percent of respondents reported that inadequate funds and conditions of service were the most important factors undermining organizational performance. Consequently, staff working in these MDAs rarely know or share the broad aspiration of their organizations. Staff commitment to organizational goals is not encouraged as the excellent performance is not actively rewarded. Low levels of interaction between management and ordinary staff in the formulation of organizational strategy also worsens this disconnect. The consequences are immediate: for most employees, there is an implicit understanding that there is no cost to poor performance, and that rewards are not based on performance.

12. **Performance management is not harnessed effectively as a key tool to drive organizational or individual employee performance.** It is not utilized, for example, to set targets, manage work outputs or reward additional ‘discretionary effort’. In the absence of a strategic linkage between the performance management process to the broader deliverables of the organization, employee accountability for performance is weakened. Chief Directors sign performance contracts at the beginning of the year without

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14 Global Competitiveness Index, 2005-2014 Ghana
a clear linkage to specific functional deliverables of respective ministries. The fundamental problem with such a system is that the measurement of performance remains output based and focuses on process activities with limited benefits associated with the mandate of the agency. Given the recent emphasis of the Government on key priorities and the decision to assign every ministry a set of deliverables and targets, performance contracts need to be aligned with ministries’ specific targets.

13. **The Government understands the need to encourage efficiency and accountability in service delivery.** To further improve efficiency and accountability in the public sector, the Office of the Head of Civil Service (OHCS) and the Public Services Commission (PSC) will review and update the formats for Client Service Charters (CSCs) and ensure that MDAs adopt and implement them.

14. **A related challenge is to measure performance across government entities.** The government monitoring and evaluation (M&E) system is hampered by weak capacity and a lack of an M&E culture. Thus, the quality of the system for monitoring and accounting for performance and results in Ghana’s public sector is mixed. Social service delivery sectors (e.g. health and education) have more mature systems given their exposure to additional resources and the demands of development partner-supported programs. A Ministry of M&E (MOME) has been set up under the Office of the President (OP) to provide real-time monitoring of the government’s strategic programs and projects in the short to medium term, with a view to taking prompt remedial action. To this end, the work of the MOME reinforces the national M&E system in ensuring that the President’s priority programmes are effectively implemented. However the capacity for M&E across the whole government remains low. Evidence-based policy making and mid-course correction of government programs is hampered by weak systems for priority setting, data collection and analysis.

15. **There is implicit recognition of the importance of M&E in government, but Ghana’s public sector M&E systems face many challenges.** These include the lack of M&E manuals and guidelines; inadequate M&E champions who consider evidence-based decision-making as an integral part of public sector management; lack of M&E core competencies and insufficient M&E staff within the MDAs; lack of performance and monitoring culture to promote utilization of M&E information and data; existing M&E systems are largely supply driven rather than demand driven; inadequate understanding of results-based management, results chain modeling and program/project theory of change mapping as tools to manage for results; lack of budgeted M&E plans; and lack of standardized data collection and reporting templates and instruments. Ministries have M&E units known as Policy, Planning, Monitoring, and Evaluation Divisions (PPMED) charged with undertaking M&E functions, but their capacity is mixed. The NDPC itself lacks enough capacity both in human and financial allocation to undertake M&E functions. Lastly, to the extent that M&E systems are increasingly based on information and communications technology (ICT), they also face challenges in coordinating ICT design and implementation with the National Information Technology Agency (NITA).

16. **To address weak performance and improve efficiency and accountability, the Government intends to focus on results and performance measurement of service delivery at administrative entities.** The Government of Ghana (GOG) is keen to shift from traditional methods of delivery to rapid results delivery on priority areas. This will include conducting real-time monitoring of delivery of services to citizens for prompt attention by the Office of the Senior Minister (OSM), the Cabinet, and the OP. To

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17 See Andrews submission
achieve this, the GOG intends to create ICT-based national monitoring systems and tools, including a Government Results Framework, electronic dashboard, and color-coded performance rating systems across all public sector service delivery entities. An important element of this approach will be the strengthening of the capacity for policy management and coordination both at the Center of Government (i.e. OSM and OP) and in individual line MDAs responsible for administrative service delivery.

17. **The Government has expressed its intention to transform the public sector into a system that focuses on results, which requires support.** The National Public Sector Reform Strategy (2018-2023), publicly launched by the President on August 8, 2018 calls for “mainstreaming results delivery models and M&E systems across MDAs to focus on reform process for results.” The Government has also prepared a National Results Framework for 2017-2020 with three outcomes per ministry, indicators to monitor, baselines, and targets. Through this instrument, the Government intends to assess the performance of its ministries in relation to the defined outcomes outlined in the Framework.

18. **To develop M&E capacity, the Government must undertake several actions.** First, the establishment of the MOME signals Government’s endorsement of the importance of M&E. Further action is needed to develop a national policy for monitoring and evaluation to provide the institutional and policy environment for M&E in government. Second, in the short to medium term, there is need to support the strengthening of the MOME to support the mainstreaming of M&E across government while also spearheading the monitoring of strategic priorities in the Government’s Policy Framework (2017-2020). Finally, the Government must outline and make a strong business case for the use of M&E for performance management in MDAs and for sectoral decision-making by strengthening the capacity for M&E in ministries, starting with PPMED units across ministries.

19. **The lack of strong performance culture at the upstream level and the absence of a culture of monitoring for results affects downstream performance of frontline entities in the delivery of administrative services.** There are three major weaknesses in the delivery of administrative services to citizens: poor institutional capacity of the various MDAs to formulate and implement policies for enhanced service delivery to citizens; inadequate support from central agencies; and limited coordination between sector MDAs. These structural inefficiencies have contributed to the low levels of service quality in frontline entities. The delivery of basic administrative services is encumbered by several bureaucratic processes that are unnecessary and waste their time causing excessive delays. For example, obtaining a passport or land title can take up to 12 months. Citizens often encounter rent-seeking activities by some civil/public servants in application processes that require human transactions. Afrobarometer reports that about 86 percent of Ghanaian citizens believe that Government officials are involved in corruption.

20. **In many cases, citizens have to rely on middlemen (‘goro boys’) who are connected to officials and pay informal fees to bypass formal administrative steps in acquiring services.** Moreover, the GOG introduced CSCs and established Client Service Units (CSU) in MDAs to receive and address citizen complaints. However, this effort did not translate into improvements in service delivery standards because not all MDAs established CSUs, and where they existed, were not fully functional due to lack of resources, leadership, and unclear mandates regarding mechanisms for interfacing with citizens. In addition, the public-sector mind-set is yet to be fully attuned to citizens’ needs. Such experience increased

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19 World Bank, “Ghana’s New Approach to Public Sector Reform – Focusing on Delivery 2010”, pg. 1
citizens’ frustration with government services, and may have contributed to the loss of public trust and confidence in government. The Management Services Department (MSD) of the OHCS has provided guidance for all civil service entities in developing CSCs. Further work is needed to strengthen the MSD to assist MDAs improve CSC quality and adhere to CSCs. The OHCS will, as part of its monitoring role of the service, develop systems for monitoring compliance of CSCs.

21. MDAs have begun the process of improving infrastructure and processes to strengthen their business offerings, but users still experience delay in the turnaround time for the services delivered. The Government attempted to address these problems by introducing ICT systems, such as online applications. However, behavioral issues and organizational cultures have undermined the success of these measures. There are some e-Government foundational weaknesses which must be tackled before full benefits of the GOG digital investments can materialize. Some MDAs have progressed to a stage where, potentially, they could have paperless back-offices and e-Services, while others are still heavily manual. But this “digital divide” between MDAs means no agency can fully automate their systems because, on many business processes stages, they depend on data from the other MDAs. This means no single agency can reap the full benefits of digitization when the rest are not similarly developed. It also means MDAs cannot realize such benefits when their digital systems are insular and not interoperable. Finally, fully dealing with delivery problems require going beyond ICT interventions to include the behavior of staff, attitudinal change and emergence of a performance culture.

22. Therefore, the short- to medium-term emphasis should be on dealing with performance management in organizations. Such a focus would address issues around the development of a culture of performance in various MDAs delivering administrative services, development of performance targets for each participating agency and rigorously collecting data to monitor performance. and improving the work conditions and the environment to enable the delivery of high quality services. This would support the emphasis of government on ensuring that, just like ministries, subordinate agencies also meet their performance targets. Further emphasis should be on improving the interface between the citizens and other users, and the frontline service providers through strengthening the Client Service Centers and other user feedback mechanisms.

C. Proposed Development Objective

Development Objective(s) (From PAD)
The objective of the project is to improve, for Selected Entities, efficiency and accountability in the delivery of selected services.

Key Results

PDO Level Indicators

23. Progress towards the PDO will be measured by the following indicators:

1. To improve the efficiency of Selected Entities in delivery of selected services
PDO Indicator 1: Percent of service users provided selected services within the time limits published in Client Service Charters/Service Standards updated under PSRRP (DLI1)
2. To improve the accountability of Selected Entities in delivery of selected services
PDO Indicator 2: Number of quarterly public meetings held by Senior Minister, where Selected Entities report on quarterly results and implementation plans for next 6 months (DLI2).

D. Project Description

24. The project has four components whose activities will enable achievement of project objectives. Component 1 focuses on strengthening organizational management and performance: the project emphasizes improving Selected Entities’ organizational performance and management, under the general oversight of the OHCS and PSC. Component 2 focuses on strengthening government-wide monitoring and evaluation to better track and monitor priority government programs undertaken by selected ministries as outlined in the 2017-2020 GRF. Component 3, key to project performance, supports improvements in the delivery of selected services in Selected Entities with a strong focus on citizen engagement and public accountability. This component focuses on key services that impact both citizens and firms, such as birth and death registry and certification; and issuance of passports, driver licenses, resident permits and environmental permits. Finally, component 4 supports project management, coordination, communications, outreach and independent verification of DLIs.

Component 1. Strengthen Organizational Performance

25. This component objective is to address two key functional problems relating to weak organizational management: (i) low levels of organizational performance resulting from weak prioritization and the lack of a culture of performance and accountability for performance; and (ii) the challenge of achieving targeted results for organizational processes and service delivery. Strengthening organizational management and performance systems is critical to increase ministries’ effectiveness and ability to perform better themselves and to provide strategic guidance to, and oversight of, their subordinate administrative agencies to improve the delivery of key public services.

Component 2: Improving Monitoring and Evaluation

26. This component objective is to address two long-standing functional M&E-related problems, namely (a) the lack of institutional accountability for performance and the inability of existing M&E units in the Government to perform fully in achieving their mandate, and (b) limited social accountability processes that inform ministries and agencies in policy-making and implementation. Under the Civil Service Act 1993, ministries and agencies have established Policy, Planning, Monitoring and Evaluation Departments (PPMEDs) or other forms of M&E units. However, MDAs are challenged by the lack of clarity in M&E responsibilities and limited capacity to collect and analyze basic statistical data. The component will be implemented by the MOME.

27. The component will finance activities to strengthen M&E institutional capacity across government that support implementation of specified priority programs in the GRF. The component will support MOME to enable M&E units in Selected Entities to strengthen their capacity. The activities aim to improve the accountability of ministries for results through establishment of M&E systems and a platform for agency-citizen dialogues in selected ministries. This component consists of two sub-components: (i) strengthening MOME’s own institutional capacity to deliver its core mandates; and (iii) monitoring service delivery by selected agencies through social accountability processes supported by the project.
Component 3: Improving Efficiency, Accountability and Citizen Engagement in Delivery of Selected Services

28. The objective of this component is to improve efficiency and accountability in delivery of selected services by the Selected Entities. There are four major efficiency and accountability constraints to service delivery to citizens and firms: (a) upstream challenges, including lack of standardized systems and processes for service delivery management and results tracking and inadequate and unpredictable budget releases for goods and services; (b) downstream challenges, including limited MDA institutional capacity to formulate and manage efficient and accountable processes at the point of service to citizens and firms; (c) horizontal challenges including limited coordination between sector MDAs; and (d) a general lack of public accountability and citizen engagement pertaining to key public services, across MDAs.

Component 4: Project Management, Coordination and Public Reporting

29. This component will finance activities on project management, coordination and public reporting. In addition to day-to-day project management, the component will support proper adherence to the Bank's fiduciary and project management guidelines and procurement of goods and services. It will also finance independent verification of DLIs, as well as project-level communications and public reporting, e.g. use of media - such as print, broadcast and online - to disseminate service information to citizens and firms; electronic public access to project implementation and results information; feedback from citizens and firms on selected services delivered by Selected Entities; and a grievance redressal and complaints handling mechanism for the project as a whole.

Component 5: Unallocated

30. This is to enable financing for key project activities if actual contract values differ significantly from estimated costs (e.g. for independent verification of DLIs) or if other national service delivery priorities (consistent with project objectives) emerge during implementation.

E. Implementation

Institutional and Implementation Arrangements

31. The Office of the Senior Minister (OSM) will be the implementing agency. The OSM will coordinate and oversee the implementation of project activities in line with its mandate for coordinating the national public sector reform agenda. In this role, the OSM will facilitate inter-agency coordination and collaboration. The Senior Minister will provide overall strategic and political leadership for the implementation of this project. The Chief Executive Officer (CEO) of the Public Sector Reform Secretariat (PSRS) in the OSM will be the Project Manager and coordinate all participating ministries and agencies and other key players towards achieving project objectives and results.

32. A Project Advisory Committee (PAC) will be established, to be chaired by the Senior Minister. The PAC will monitor project implementation progress, provide advice to implementing agencies, and hold quarterly public meetings chaired by the Senior Minister where Selected Entities will submit written and oral reports on progress and results for their respective activities, outline implementation plans for the next six months, and seek public feedback. The PAC will meet twice a year to review progress towards
achievement of Disbursement Linked Indicators (DLIs) and project implementation progress. The PSC, OHCS and each participating ministry will be represented in the PAC.

33. **The OSM will establish a project management unit (PMU).** The PMU will be led by the CEO of the PSRS who will be the Project Manager who, together with the Deputy Project Manager (a civil servant), who will handle the day to day project operations; a Financial Management Specialist; a Procurement Specialist; and an M&E Specialist. The PMU will report to the Project Manager and will also serve as the Secretariat to the PAC. The PMU will be supported by technical staff drawn from the OSM.

34. **Each Selected Entity will establish a Project Implementation Team (PIT) to implement its respective project activities.** Each PIT will be headed by a Coordinator at Director level, reporting to the Chief Director. The Coordinator will be responsible for leading a small team in the implementation of project activities related to that Selected Entity under the guidance of the Chief Director. The PIT’s main functions will include: providing overall leadership, planning, management and control of the Selected Entity’s project activities, including preparation of terms of reference (or functional requirements and technical specifications, as the case may be), selection of consultants, assisting with procurement of goods and services (e.g. assisting with preparation of short-lists and evaluation of bids), supervision of consultants/vendors/suppliers for entity activities; implementation of activities with guidance from senior management of the entity; tracking the achievement of results within the entity and reporting on achievement of entity-level DLIs and other results to the PAC. Component 1 will be implemented and coordinated by the PSC and OHCS, and Component 2 will be implemented by the MOME. The OSM will responsible for overall coordination and project management.

**F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

Not applicable. The project covers the entire country.

**G. Environmental and Social Safeguards Specialists on the Team**

Gloria Malia Mahama, Social Safeguards Specialist  
Anita Bimunka Takura Tingbani, Environmental Safeguards Specialist  
Alidu Babatu Adam, Social Safeguards Specialist

**SAFEGUARD POLICIES THAT MIGHT APPLY**

<table>
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<th>Safeguard Policies</th>
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<td>Environmental Assessment OP/BP 4.01</td>
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Performance Standards for Private Sector Activities OP/BP 4.03  No
Natural Habitats OP/BP 4.04  No
Forests OP/BP 4.36  No
Pest Management OP 4.09  No
Physical Cultural Resources OP/BP 4.11  No
Indigenous Peoples OP/BP 4.10  No

Involuntary Resettlement OP/BP 4.12  No  The project activities have no or negligible environmental and social safeguards impacts. No land acquisition or involuntary resettlement is envisaged or expected to occur. Notwithstanding this, the Borrower will initiate steps to incorporate key World Bank corporate requirements - gender, social inclusion, citizen engagement, and grievance redress mechanisms - in project design and implementation.

Safety of Dams OP/BP 4.37  No
Projects on International Waterways OP/BP 7.50  No
Projects in Disputed Areas OP/BP 7.60  No

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts: This project does not have any activities that might pose any safeguards risks.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: No potential impacts are expected from the activities in this project.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts. No alternatives are called for given the design and coverage of this project.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described. Not applicable as this project does not trigger any safeguard risks.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.
B. Disclosure Requirements

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?  
NA

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?  
NA

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?  
NA

Have costs related to safeguard policy measures been included in the project cost?  
NA

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?  
NA

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?  
NA

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Raymond Muhula  
Senior Public Sector Specialist

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**APPROVAL**

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Miki Matsuura  
Raymond Muhula |
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<td>Approved By</td>
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<td>Safeguards Advisor:</td>
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| Practice Manager/Manager: | Hisham Waly  
12-Aug-2018 |
| Country Director:    | Errol George Graham  
14-Aug-2018 |