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HEADQUARTERS

GHANA POLICE
ACCRA

27th JULY, 2022

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POLICE ADMINISTRATION'S RESPONSE TO YOUR CORRUPTION IN GHANA RESEARCH REPORT

1. The Police Service would like to commend your three institutions - the Ghana Statistical Service(GSS), Commission on Human Rights and Administrative Justice (CHRAJ) and the United Nations Office on Drugs and Crime (UNODC) for your maiden research on corruption which, according to you, was aimed at collecting evidence-based information on forms of corruption, to determine the prevalence and prevailing typologies in the country.
2. We assume that such a research is aimed at finding solutions for the country's corruption-related problems. The Service has long acknowledged that some of its personnel may be involved in some corrupt practices and we continue to implement measures to discourage such conduct. It probably would have been helpful if you had engaged us to take on board what is being done by the Service and incorporated this into your findings.
3. Be that as it may, we have read your report and after a review, we wish to state that we have serious concerns with the research and its findings. However, before we delve into these concerns, we wish to indicate that taking your research and its findings at face value, it is evident that all the institutions surveyed came up as corrupt. Our discomfort therefore, is the use of a selective ranking methodology to project the outcomes in a manner that puts an unfair focus on the Police service with all the others in your corruption index escaping public scrutiny.
4. We would appreciate your response to the following concerns to enable us understand your research outcomes and also further shape measures being implemented by the Service to improve our service delivery.
 - i. It has been observed that the research did not cover some other public institutions such as the Ghana Ports and Harbours Authority,

Ghana Civil Aviation Authority, Audit Service, Parliamentary Service, Ghana National Fire Service, Gaming Commission, Public Media houses, National Disaster Management Organisation (NADMO), Narcotic Control Commission (NACOC), the Attorney-General's (AG's) Department, the Registrar General's Department among others and these are all institutions, we believe, that the public deal with regularly.

- ii. More importantly, a further scrutiny of the report shows that your two institutions (CHRAJ and Ghana Statistical Service) were also not part of the research and we are wondering why you do not think they are also candidates for corruption investigation, considering that they also provide critical services to the public.
- iii. We also noticed that some institutions such as the Ghana Revenue Authority (GRA) were disaggregated into components with one part touching on Customs officers and another part on tax officers. Another example is the Ghana Health Service where you had doctors, nurses and midwives in one group and other health workers in the public hospitals constituting the other group. Even some other institutions such as public utility services, which include the Ghana Water Company, Electricity Company of Ghana and others were aggregated as one. One wonders why the lack of consistency in your approach.
- iv. In addition, in some instances you combined different institutions as one entity; for example, prosecutors are not part of the judicial service but you put them together as one. Also, teachers and lecturers, though both operate in the education sector, do not belong to the same institution but were lumped together. We consider this to be a clear case of combining mangoes and oranges to corrupt the flavour of each.
- v. For some other institutions, only sections were covered; for example, the Judicial Service is not made up of only judges. Lecturers, professors and teachers are not the full complement of the institutions they represent. What about the other officials of these institutions? Do their actions not affect service delivery of their institutions? This is evident that you compared the whole of some institutions to the parts of some others. In specific terms, you compared the whole of

the Police Service with sections of the Judicial Service, sections of the GRA and others.

- vi. We Know that there are three branches (arms) of government, namely the Executive, Legislature and Judiciary. From our understanding, most of the institutions covered in your research are under the Executive branch and yet, you also introduced another institution named the Executive Branch of Government without offering any explanation as to what it constitutes. Your comment on this will be helpful.
- vii. We have also read that you used some multiple levels of quality assurance to eliminate errors in your research, but looking at the report, we believe we have good reason to be sceptical about this quality assurance mechanism. For example, we wonder whether you made any attempts to verify and authenticate from any of the affected institutions the credibility of the information given you by the interviewees since we cannot feel that in the research.
- viii. From your report, the corruption prevalence rate is determined by the number of contacts who paid bribes or were asked to pay bribes but refused as a percentage of the total number of contacts. We realised that a contact is defined as at least a single experience with the institution. This suggests that there could be single or multiple contacts. Did you treat multiple contacts and single contacts in the same way, knowing that this would affect the denominator of the corruption prevalence rate formula and therefore the final percentage for each institution and ultimately, the ranking? For example, if there are two people and one of them has had only one contact with institution A, and the other had 20 contacts with institution B. If we treat the 20 contacts as one contact, then in institution A, there will be one contact and in institution B, there will also be one contact. If in institution A, the contact resulted in a bribe, then the prevalence rate will be 100 percent ($1/1 \times 100 = 100\%$) and if in institution B, the 20 contacts are treated as one, then the prevalence rate will be 100% ($1/1 \times 100 = 100\%$). However, if we treat the 20 contacts separately, we will have a prevalence rate of 5% ($1/20 \times 100 = 5\%$) for institution B. This means that the prevalence for institution B will be 20 times less than institution A. We would like to know which approach you used.


- ix. Closely related to point (xiii) above is the issue of how often bribes are paid by a single contact to a public official. In your research, it was analysed in isolation and the average number of times a contact paid bribe during the research period was reported. We want to know how this was factored in the computation of the overall prevalence rate which informed the contact-based ranking.
- x. From your research, the definition of corruption is about the aggregate of those who paid bribes and those who were asked to pay but refused. This aggregate was used to compute the corruption prevalence rate. We are interested in knowing the portion of those who paid bribes as against those who were asked but refused to pay and whether those who refused to pay were disadvantaged in the service they required. This will enable us assess our mechanisms aimed at educating and empowering the public to resist attempts by any officer to engage in any corrupt practices.
- xi. As you are aware, one of the major consequences of corruption is its ability to take away resources meant for socio-economic development for the benefit of all. Therefore, the value of the amount lost to corruption will play a key role in determining the prevalence of corruption and which institutions are causing the most harm when it comes to the size of bribes paid. When you did the ranking using the value-based (size of bribes paid) method, we realised that the Police Service was one of the least corrupt institutions and came nowhere near the top as per figure 21 of page 32 of your report. This should be projected in the same way that the contact-based ranking is being projected. You also indicated that about Five Billion Ghana Cedis was lost to corruption during the period of your research and we would like to know how much of this was police related.
- xii. Using your contacts-based and the value-based ranking methods for your analysis, we would like a regional, monthly and departmental breakdown of your findings for the Police Service to enable us pinpoint where the issues are and tackle them.
- xiii. We also did not see any specific recommendations in the report and we find it surprising that a major research like this did not offer any recommendations and solutions.

xiv. There is also the real risk that your research may have been affected by a historically pervasive stereotyping of the Police Service. The Service has almost now become the default institution of choice for such research and has therefore encouraged a deep-seated public stereotype over the years. This stereotype may easily influence respondent choices and it is therefore fair to expect that you factor it in assessing the validity of your findings.

5. From the foregoing, it is our considered view that the research and its findings are heavily challenged and corrupted from both the academic and practice point of view.

6. We want to place on record that we are passionate about this because the continuous empirically and scientifically unsubstantiated labelling of the Police Service as the most corrupt institution in the country only goes to feed this perception and damage the reputation of the Service as well as weaken the morale of its personnel. As we have all now come to accept, perception tends to be more powerful than reality and therefore we have no choice than to share our position on this matter.

7. Whilst we wait for your response, please accept the assurance of our highest consideration.



GEORGE AKUFFO DAMPARE, Ph.D
INSPECTOR-GENERAL OF POLICE

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- The Ghana Statistical Service
- The Commission on Human Rights and Administrative Justice
- The United Nations Office on Drugs and Crime
- The Public Affairs Department, Ghana Police Service