



Governance Diagnostic Assessment Roadmap

Ministry of Finance and Economic Affairs

Public Finance Management Directorate- September 2024

GOVERNANCE DIAGNOSTIC ASSESSMENT (GDA) ROADMAP

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ACRONYMS

AC	Audit Committee
AML	Anti-Money Laundering
DTD	Domestic Taxes Department
IAU	Internal Affairs Unit
LEAs	Law Enforcement Agencies
ML	Money Laundering
MLA	Mutual Legal Assistance
PIP	Public Investment Projects
PSC	Public Service Commission
PMO	Personnel Management Office
SSHFC	Social Security and Housing Finance Corporation

GOVERNANCE DIAGNOSTIC ASSESSMENT (GDA) ROADMAP

1.0: PURPOSE OF THE GDA ROADMAP

The purpose of the Government Diagnostic Report (GDA) Roadmap for The Gambia is to provide a structured framework for assessing governance weaknesses, vulnerabilities to corruption and the country's development challenges and opportunities. It aims to identify key socioeconomic and governance issues, engage stakeholders for diverse insights, and inform evidence-based policy recommendations. In particular, the GDA aims to promote transparency and accountability in governance while outlining pathways for sustainable development. Ultimately, it serves as a critical tool for informed decision-making and strategic planning in The Gambia's development journey.

2.0: OVERVIEW OF GDA FRAMEWORK

2.1 What is GDA?

The Government Diagnostic Assessment (GDA) is a comprehensive assessment tool designed to evaluate a country's macroeconomic context and development landscape, focusing on its socioeconomic and governance challenges. It serves several key functions, starting with a holistic analysis that examines various aspects of a country's situation, including economic performance, institutional arrangements, social context, and governance structures. This multidimensional approach helps identify both strengths and weaknesses, providing a clear picture of the overall developmental context.

The report involves collaboration with a diverse range of stakeholders, including government agencies, civil society organizations, private sector actors, and local communities. This engagement ensures that the report reflects multiple perspectives and fosters inclusivity, making the findings more relevant and actionable.

Data-driven insights are at the core of the GDA. By collecting and analyzing both quantitative and qualitative data, the GDA provides evidence-based insights that inform decision-making and policy formulation. One of its primary objectives is to generate actionable recommendations for policymakers, addressing identified challenges, improving governance, and promoting sustainable development.

Moreover, the GDA emphasizes the importance of accountability and transparency in governance. It aims to enhance these elements in public administration, which is crucial for building trust and fostering civic engagement among the populace. Additionally, the GDA aligns its findings with international development frameworks, such as the Sustainable Development Goals (SDGs), ensuring that national strategies contribute to global efforts for sustainable development.

3.0: IMPORTANCE OF GDA IN PUBLIC FINANCIAL MANAGEMENT (PFM)

- **Enhanced Accountability:** The GDA promotes transparency in financial processes, helping to hold government entities accountable for their spending and resource allocation, which is crucial for building public trust.

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- **Informed Decision-Making:** By providing a comprehensive analysis of financial data and resource utilization, the GDA equips policymakers with evidence-based insights to make informed decisions that enhance budget efficiency and effectiveness.
- **Identifying Inefficiencies:** The report helps identify inefficiencies and areas of financial mismanagement, enabling governments to streamline processes, reduce waste, and optimize resource allocation.
- **Strengthening Budget Formulation:** The GDA contributes to improved budget formulation by aligning budget priorities with developmental goals and stakeholder needs, ensuring that public funds are directed towards impactful projects.
- **Capacity Building:** By assessing the current PFM practices, the GDA highlights areas for capacity building within government institutions, fostering a more skilled workforce capable of effective financial management.
- **Facilitating Stakeholder Engagement:** The GDA encourages collaboration among various stakeholders, including civil society and the private sector, fostering a more participatory approach to financial management and oversight.
- **Supporting Sustainable Development Goals:** The GDA aligns PFM practices with international best practices, ultimately supporting the attaining of the Sustainable Development Goals (SDGs), ensuring that financial resources contribute to broader development objectives and sustainable outcomes.
- **Enhancing good performance against stakeholder outcomes.** By proving a gap between current governance practices and best practices in public sector governance, and encouraging adoption of good practices, the GDA identifies priorities for reform in the governance area with a resultant good performance against stakeholder expectations.

4.0: IDENTIFIED GOVERNANCE WEAKNESSES and corruption vulnerabilities

- Lack of proper capacity building in public entities
- Public entities often suffer from understaffing
- Lack of skills to implement modern processes
- Most public processes including those related to collection of tax revenue are paper-based, and at times supported by unreliable data sources
- Regulations underpinning public processes are not always up to date with legislation
- Shortcomings of the anticorruption legal framework which does not effectively address corruption risks in the Gambia.

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- The existing asset declaration regime provided in the Constitution is not in line with international best practices and does not effectively support transparency and accountability in public sector
- Legal framework for public access to information has shortcomings and the institutional architecture is missing
- Anticorruption and anti-money laundering investigation and enforcement institutions lack sufficient guarantees for independence and necessary resources to perform the mandate.
- The judicial system is also affected by governance vulnerabilities, including protracted delays and weak independences
- There are corruption vulnerabilities resulting from the complex land tenure system and land administration arrangements.

5.0: IMPLEMENTATION ROADMAP

Note: Definition of Timeline

- Short term = 0 – 1 years
- Medium term= 1-3 years
- Long term = 3-5 years
- Indication of all timeline period = continue activity to be implement at all times

Thematic Area 1.0: Governance and Accountability					
Outcome 1 .1	Enhance effectiveness of Anti-Corruption Frameworks				
Output 1.1.1	<i>Promote Anti-Corruption Commission and Legal Framework</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> • Approve and establish an Anti-Corruption Commission 	✓			Ministry of Justice and
	<ul style="list-style-type: none"> • Establish asset declaration system for public officials in line with international best practices 				

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	<ul style="list-style-type: none"> Amend the draft Anti-corruption bill (AB) by (i) closing the gaps of definitions of corruption-related criminal offences as identified in the GDA, more specifically by adding the offence of illicit enrichment, (ii) introducing provisions that ensure adequate protection of whistleblowers, including protection against retaliation, (iii) include provisions defining conflicts of interests and putting in place a management system of those conflicts, (iv) eliminating the certificate of indemnity figure or amending it to ensure it only applies if conditions are met, such as effective collaboration for the recuperation of assets or for prosecution against top level officials involved in corruption. 	✓			
	<ul style="list-style-type: none"> Implement Public Service Act and Regulations 	✓			Ombudsman / PSC/PMO
Output 1.1.2	<i>Improve Investigation and Enforcement of rule of law</i>				
	Actions	Timeline			Responsible
		S	M	L	

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	<ul style="list-style-type: none"> Appoint a Director for Public Prosecutions at the Ministry of Justice 	✓			Ministry of Justice
			✓		
	<ul style="list-style-type: none"> Create a cross-sectoral committee to implement the AB of the AC strategy 	✓			
Output 1.1.3	<i>Improve Transparency and Access to Information</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Appoint commissioners, information officers, and deputy information officers, as provided under the Access to Information Act. 		✓		Ministry of Information and Communication Infrastructure
	<ul style="list-style-type: none"> Enact implementing regulation of the Access to Information Law 		✓		

Outcome 1.2	Protection of Property Rights and Contract Enforcement				
Output 1.2.1	<i>Improve the Effectiveness of the Sheriff's Department in Enforcing Judgments</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Strengthen the capacity of the Sheriff's department 	✓			Ministry of Justice

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	<ul style="list-style-type: none"> Publish on a periodic basis log of enforcement orders 	✓			
	<ul style="list-style-type: none"> Review of court rules 	✓	✓		
	<ul style="list-style-type: none"> Establish and enforce a code of conduct for the Sheriff's department 	✓			
Output 1.2.2	<i>Address Vulnerabilities in the Judicial System</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Conduct a review of the budgetary needs of the judiciary, including compensation for judges and physical infrastructure 	✓			Ministry of Justice
	<ul style="list-style-type: none"> Establish fast-track procedures (including dedicated divisions) for adjudication of commercial claims 	✓			
Output 1. 2.3	<i>Update the Position of the Chief Justice and the Offices of Judge</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Review and reform the role of the Chief Justice and the offices of judges 	✓			Ministry of Justice
	<ul style="list-style-type: none"> Phase out the inclusion of higher court judges in the panel of lower courts 	✓			

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Output 1.2.4	<i>Strengthen Legal and Operational Framework for the Acquisition and Transfer of Real Property</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Implement Land reforms, including clarifying the land tenure system to ensure greater clarity in title 		✓		Ministry of Lands and Regional Government
	<ul style="list-style-type: none"> Establish clear criteria for, and oversight of, allocation of State lands 	✓			
	<ul style="list-style-type: none"> Digitalization of land registry and records 		✓		

Outcome 1.3	Enhance Oversight and Governance of State-Owned Enterprises (SOEs)				
Output 1.3.1	<i>Improve SOEs Performance</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Publication of SOE financial statements 	✓			MoFEA, DSOE
	<ul style="list-style-type: none"> increase the capacity of DSOE 	✓	✓	✓	MoFEA
	<ul style="list-style-type: none"> Review the regulatory framework for SOE 		✓		MoFEA, PURA
	<ul style="list-style-type: none"> End SSHFC mortgage scheme for pensioners 		✓		SSHFC

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<ul style="list-style-type: none"> Strengthen governance and PURA's role in regulatory entity.. 	✓	✓	✓	MoFEA, PURA
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Thematic Area 2.0: Financial Integrity and Management

Outcome 2.1	Enhance Effectiveness of the Anti-Money Laundering (AML) Framework
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Output 2.1.1	<i>Improve Policy and Institutional Priorities</i>
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	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Improve coordination and collaboration between anti-corruption and AML stakeholders 	✓			NCC
	<ul style="list-style-type: none"> Conduct a thematic assessment of sectoral vulnerabilities for money laundering. 	✓			MoLRG

Output 2.1.2	<i>Prevention of Corruption and Money Laundering</i>
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	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Improve application of preventive measures by reporting entities (notably measures related to politically exposed persons and beneficial ownership information). 	✓			

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	<ul style="list-style-type: none"> Collect and publish beneficial ownership information at the time of land transfers. 	✓	✓		FIU
	<ul style="list-style-type: none"> Increase resourcing and capacity for AML/CFT risk-based supervision of banks and higher risk designated non-financial sectors 	✓			
	<ul style="list-style-type: none"> Ensure that supervisory risk tools are calibrated to be sensitive to risks from laundering of proceeds of corruption 	✓			
	<ul style="list-style-type: none"> Undertake measures to ensure access to adequate ownership information for legal persons and entities 	✓			
Output 2.1.3	<i>Anti-corruption and Anti-Money Laundering Financial Intelligence and Enforcement</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Prioritize analysis and dissemination of financial intelligence related to proceeds of corruption in line with risk profile 	✓	✓	✓	FIU
	<ul style="list-style-type: none"> Increase resourcing for LEAs and prosecutors to ensure ML investigations/prosecutions in line with the Gambia's risk profile 	✓	✓	✓	
Output 2.1.4	<i>Strengthen International Cooperation and Asset Recovery</i>				
	Actions	Timeline			Responsible

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	S	M	L	
<ul style="list-style-type: none"> Improve quality of outgoing MLA requests through trainings and capacity building and establish case management systems and improve interagency collaboration for incoming MLA requests. 	✓	✓	✓	FIU
<ul style="list-style-type: none"> Introduce safeguards in the management of recovered assets to mitigate risks of their misappropriation. 	✓	✓	✓	

Outcome 2.2	Enhance Public Financial Management				
Output 2.2.1	<i>Accountability and Integrity of Human Resources</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Review subsidy policy for farmers 	✓	✓		Ministry of Agriculture, MoEFA, NAO
	<ul style="list-style-type: none"> Revise the pay structure and career development for civil servants. 	✓			MoFEA
Output 2.2.2	<i>Improve Public Investment and strengthen Public Procurement</i>				

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	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Develop a pipeline of PIPs investment priorities 	✓	✓		MoFEA/AC
	<ul style="list-style-type: none"> Finalize the GPPA regulations and train necessary staff 	✓			GPPA, MoFEA

Output 2.2.3

Transparency and Controls

	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Roll-out IFMIS to all subvented institutions 	✓			MoFEA/AGD
	<ul style="list-style-type: none"> design and implement sanctions for officials who do not enter financial transactions into the IFMIS. 	✓			MoFEA
	<ul style="list-style-type: none"> Publish implementations of audit recommendations 	✓			
	<ul style="list-style-type: none"> Publish NAO reports 	✓			NAO

Outcome 3	Enhance Revenue Administration				
Output 2.3.1	<i>Review and amend the GRA Act</i>				
	Actions	Timeline			Responsible
		S	M	L	
	Review the GRA Act				

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<ul style="list-style-type: none"> • Review the GRA Act to improve transparency and adopt modern revenue administration governance practices: <ul style="list-style-type: none"> (i) Minimize use of discretion, and where it is not expedient to do so, adopt and publish a criteria for its application. (ii) Develop clear and transparent process for recruitment of the GRA executive management and the Board. (iii) Delegate powers to recruit the Board and the CG to minister of finance and following a transparent merit based system • Improve GRA policies and procedures by: <ul style="list-style-type: none"> (iv) approve all pending policies and procedures. (v) identify missing ones, and document them. (vi) develop a central repository for all policies and 	✓	✓	✓	GRA
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<p>procedures for ease of access;</p> <p>(vii) Digitalize GRA processes and procedures</p> <p>(viii) Strengthen the GRA reforms management methodology and reforms design and implementation governance.</p>				
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Output 2.3.2	<i>Human Resources</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Review of the GRA HR function and HR regime 	✓			GRA
	<ul style="list-style-type: none"> Strengthen capacity of IAD and IAU to enhance management assurance. 	✓	✓		MoFEA/IAD
Output 2.3.3	<i>Risk Management</i>				
	Actions	Timeline			Responsible
		S	M	L	
	<ul style="list-style-type: none"> Strengthen risk management by developing and adopting the Enterprise Risk Management Manual 	✓			MoFEA/PFMD
	<ul style="list-style-type: none"> Completing development of the compliance risk management framework for DTD. 	✓			MoFEA/DTD

Thematic Area 3.0: Monetary and Financial Sector Stability					
Outcome 3.1	Enhance Central Bank Governance and Operations				
Output 3.1.1	<i>Improve Transparency and Controls</i>				
	Actions	Timeline			Responsible
		S	M	L	

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	<ul style="list-style-type: none"> Divest from ownership of MegaBank. 	✓				CBG, MoFEA
	<ul style="list-style-type: none"> Establish a compliance function to monitor and report on the CBG' compliance risks. 	✓	✓			CBG
	<ul style="list-style-type: none"> Strengthen collegial decision-making at the executive management level through the establishment of an Executive Board (as provided for in the CBG Act) 	✓				CBG
	<ul style="list-style-type: none"> Review and update the Delegation of Authority framework to, inter alia, align with the CBG Act, and internal rules and regulations. 	✓				CBG
	<ul style="list-style-type: none"> Increase the frequency of CBG Board meetings to provide closer oversight of the CBG's operations and to ensure reforms are implemented. 	✓				CBG
	<ul style="list-style-type: none"> Approve a multi-year capacity building plan covering all functions of the CBG, including plans for recruitment, inhouse training, and professional certification of relevant staff 	✓				CBG

Outcome 3.2	Enhance Financial Sector Oversight
Output 3.2.1	<i>Improve Accountability and Transparency</i>

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Actions	Timeline			Responsible
	S	M	L	
<ul style="list-style-type: none"> Enact the new Banking Act 	✓	✓		CBG, MoFEA
<ul style="list-style-type: none"> Broaden the scope of the Financial Stability Committee, 	✓			CBG
<ul style="list-style-type: none"> Strengthen its reporting to the full CBG Board 	✓			
<ul style="list-style-type: none"> increase disclosure and transparency of the Committee's activities 	✓	✓	✓	
<ul style="list-style-type: none"> Strengthen internal governance arrangements for banking supervision function, including the development of supervisory decision-making framework, together with its operational procedures 	✓	✓	✓	CBG
<ul style="list-style-type: none"> Increase resources, strengthen capacity and digitalization of banking supervision function 	✓	✓		CBG
<ul style="list-style-type: none"> Modernize the enforcement framework to bring it in line with best practices: 	✓	✓	✓	CBG

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<ul style="list-style-type: none"> Describe the sanctions' application mechanism taking into account severity of issues and how sanctions need to be sequenced; 	✓			CBG
<ul style="list-style-type: none"> Prescribe mandatory sanctions or fines for certain violations/not compliance with prudential requirements; and 	✓			
<ul style="list-style-type: none"> Update and prompt corrective action framework 	✓			
<ul style="list-style-type: none"> Strengthen the regulations and practices regarding the licensing function 	✓			CBG
<ul style="list-style-type: none"> Update the licensing guideline for banks 	✓			
<ul style="list-style-type: none"> Develop clear internal operational procedures and comprehensive manual for licensing; 	✓			
<ul style="list-style-type: none"> increase resources and strengthen capacity. 	✓			
<ul style="list-style-type: none"> Modernize the framework, tools, and techniques for assessing the suitability of members of the boards and senior management 	✓			

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<ul style="list-style-type: none">• Report bank's practices on corporate governance	✓	✓	✓	CBG
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