

SUSTAINABLE FISHERIES MANAGEMENT PROJECT (SFMP)

Mid-Term Review of NAFPTA'S Action Plan



APRIL,2018





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Cover photo: A NAFPTA member drying her fish (Credit: Hopeson Eli Etsra)

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SNV:	http://www.snvworld.org/en/countries/ghana

ACRONYMS

CRC	Coastal Resource Center
DO	Donor Organization
FtF	Feed the Future
LOP	Life of Project
M & E	Monitoring and Evaluation
NGOs	Non-Governmental Organizations
SFMP	Sustainable Fisheries Management Project
SNV	Netherlands Development Organization
SSG	SSG Advisors
URI	University of Rhode Island
USAID	United States Agency for International Development
OCA	Organizational Capacity Assessment
CSO	Civil Society Organizations

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EXECUTIVE SUMMARY

The Organizational Capacity Assessment which started in 2015 with local partners of the Sustainable Fisheries Management Project is in its fourth year of project implementation. The objective of the capacity assessment was to ensure that local partners of the project have robust systems and structures to make them attractive to Development Partners and also qualify them for the USAID FORWARD initiative. The USAID FORWARD initiative was started by the Obama Administration to ensure that local organizations can assess donor funds directly without third parties. This initiative brought to the fore the need to conduct assessments for these partners to ensure that their operating systems can stand the test of time.

Currently the Assessment Team is conducting Mid-Term reviews after the baseline assessments in 2015. NAFPTA which is a national body of fish processors and traders in Ghana is a beneficiary of the SFMP's capacity building initiative. It is in that regard that the Capacity Assessment Team in SNV comprised of Mrs. Sarah Naa Dedei Agbey and Hopeson Eli Etsra on the 6th of April, 2018 met with the leadership of NAFPTA to measure progress made as regards compliance with their action plan.

Per the discussions and review of the actions, it was very evident that NAFPTA has taken the organizational assessment in good stead and are doing their very best to comply, and also introduce new perspectives to organizational effectiveness through developed standard operating procedures documents.

As regards their governance systems, NAFPTA complied with the actions at fifty-five percent, with the need to constitute a Board being a priority action. NAFPTA has also taken the additional step by changing the status of the group from an NGO to an Association. Currently, the national executives play the role of the Board until a substantive Board is constituted at the next Annual General Meeting (AGM).

On Human resource development, NAFPTA has a staff now and its office is ready for use. NAFPTA is yet to organize training for its staff though the staff has been participating in trainings organized for the association as a whole.

With regards to financial management systems, NAFPTA does not have a finance team to help in developing and managing a finance management system.

On the issue of Programs, NAFPTA has been organizing training programs for members with support from both Government bodies as well as NGOs. NAFPTA at the moment does not have a program officer to support in achieving project outcomes.

For External Relations and Partnerships, NAFPTA's relationship with Government Partners and the Private sector has increased.

Sustainability was one of the flagged issues during this assessment. NAFPTA needs to address issues related to sustainability to ensure continuous existence of the association, to achieve its goals of supporting fish traders and processors in the country. Currently, NAFPTA is addressing that challenge of financial sustainability by ensuring that members of the association pay monthly dues. This is to ensure diversification of their funding base.

This report has discussed in detail as regards each domain. NAFPTA from the mid-term evaluation is doing great.

SECTION 1: BACKGROUND

USAID has committed approximately \$24 million US Dollars to the implementation of the 5 year Ghana Sustainable Fisheries Management Project (SFMP) running from October 2014 to October 2019. The project is tasked with rebuilding marine fisheries stocks and catches through adoption of responsible fishing practices. This important project contributes to the Government of Ghana's fisheries development objectives and USAID's Feed the Future Initiative.

To become strong and effective, organizations must assess and analyze the roots of their successes and challenges. As part of the project, SNV is leading the capacity building component to support and prepare local organizations to receive funding directly from USAID and other Donor Organizations (DOs).

The objective of the capacity development initiative is to facilitate and support the development and strengthening of capacities of key local partner organizations to:

- Allow for effective implementation of the SFMP project
- Improve quality and sustainability of the services they provide to their constituencies, and
- Position participating local NGOs to be ready and capable of receiving direct funding from USAID and other donors in line with the USAID Forward initiative.

The OCA process was carried out in 3 steps:

- Step 1- Self- Assessment
- Step 2- Full OCA On-Site Assessment
- Step 3- Participatory Evaluation of Results and Action Plan Development.



Figure 1: Three steps of OCA process

To promote ownership of the capacity development intervention, SNV/CRC-URI used participatory self-assessment tools that included input from the constituencies served by our partner organizations; CSO's and key government institutions and universities.

The self-assessment was used in addition to the Organizational Capacity Assessment tool to benchmark each organization at the beginning, midpoint and end of the project. Results of the baseline assessments identified each organization's needs and priorities.

Following the OCA, a tailored action plan was developed in collaboration with NAFPTA. The Action Plan will allow NAFPTA to measure their progress and ensure they are on track for the mid-term and final evaluations. Steady progress over the LOP is very important and the Action Plan will assist with keeping NAFPTA on track. Progress according to the Action Plan will be measured and monitored regularly throughout the life of the project and this meeting was a mid-term review of action plans to measure the progress NAFPTA is making as regards the agreed actions.

The assessment was categorized into 6 main topical issues including:



Figure 2: 6 main topical issues that was categorized for the assessment

The assessment scale runs from numbers 1-6 with "1" representing a very urgent need and "6" suggesting all is in order and there is no need for change. The assessment scale is instrumental not only in understanding where the local organizations are, but also assisted in prioritizing focus areas during the action plan development.



Figure 3: Organizational Capacity Assessment Scale

- 1= Needs very urgent attention
- 2= Needs urgent attention
- 3= Needs many improvements, but without urgency
- 4= Needs to improve some aspects, but without urgency
- 5= Needs some minor adjustment, but without urgency
- 6= No need for improvements

1.1 Meeting Objectives

The objective of the meeting was to:

• Review agreed actions of NAFPTA as per their Action plan

1.2 Expected outcomes

Expected outcome of the meeting includes:

• NAFPTA measuring their level of progress using the Mid-term review.

SECTION 2 MID-TERM REVIEW

SNV, on April 6th 2018, conducted a mid-term review of the agreed actions to be taken by NAFPTA from assessment of 2016 to ensure that their systems were improving so as to make them an effective organization.

The organizational development team for the mid-term review consisted of 2 SNV staff, more specifically:

- Mrs. Sarah Agbey
- Mr. Hopeson Eli Etsra

SECTION 3: BRIEF HISTORY OF NAFPTA

The National Fish Processors and Traders Association (NAFPTA) is a national association of fish processors and traders. It was established on 31st March, 2015 to promote coordination, information and improve capacity among stakeholders in the processing and trading in the fisheries sector. The vision of NAFPTA is to organise members, identify their common strengths and weaknesses, and together as a whole work with a common voice to advocate for policies that will sustain and promote their business. NAFPTA is helping the fish processors and traders through trainings improve their socio–economic status.

SECTION 4 RESULTS FROM MID TERM REVIEW OF ACTION PLANS

NAFPTA per the data from the midterm review is doing quite well as regards organizational capacity assessment. Moreover, the commitment by the current National President and executives to ensuring that the Association grows is impressive. They have availed themselves of their support and time to ensure that they comply with the recommendations from the Assessment Team.

The Assessment Team compared the assessment from the baseline conducted to the mid-term assessment results to measure the level of progress made as regards the initiatives NAFPTA had to take to ensure that they were on track to meeting the demands from the Action Plan. Below are the comparative assessment scores.

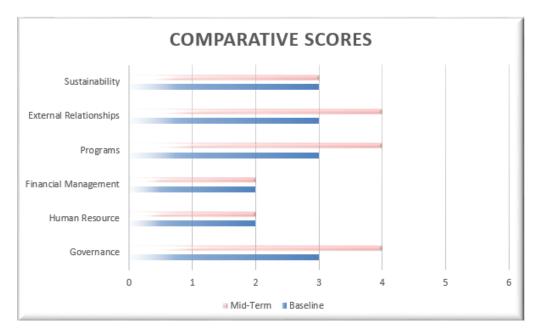


Figure 4: NAFPTA's progress per assessment data

4.1 Governance

The objective of assessing the Board of Directors was to establish the existence of the Board of Directors and to assess the effectiveness and efficiency of the Board to providing oversight responsibility and advice to NAFPTA.

Per the issues discussed from the assessment, it was evident that NAFPTA at the moment still does not have a functional Board of Directors. The previous Board used in the baseline assessment was constituted by the Ministry of Fisheries and Aquaculture Development (MoFAD). The group now seeks to dissociate itself from any political institution. In this regard, steps have been taken to register the group as an independent association. In view of this decision, it was agreed that the current national executives would act as the Board for the association until the next election, where a substantive Board would be constituted. The national executives acting as the Board would be confirmed at the next AGM to be organized by the association.

Also, as regards setting up a Fiscal Committee, it was observed that NAFPTA has still not constituted a Fiscal committee. This committee would ensure that the financial responsibilities of the association are carried out in an efficient and transparent manner.

The processes leading to changing NAFPTA from an NGO to an Association has been started and the documentations are almost complete, with final documents to be ready on April 9, 2018. The change is to enable NAFPTA to operate as an independent organization, free from political influences, and to improve their ability to seek direct funding from donor organizations.

NAFPTA's constitution needed reviewing and this had been done. The finalized copy of the constitution had been adopted for use by the members.

During the assessment on Leadership, the assessment was based on relating the roles of the Board to the roles of the national executives. Basing the assessment on the roles of the national executives, the score as compared to the baseline declined.

On the issue of developing a knowledge management strategy, it was realized that NAFPTA has a Facebook page and a WhatsApp group, but NAFPTA is yet to develop a website.

The Assessment Team scored NAFPTA an average of 4 which means that NAFPTA's Governance needs to improve some aspects like;

- The need to get a substantive Board to actively run affairs of NAFPTA
- Setting up the Fiscal committee to manage the financial activities of the association

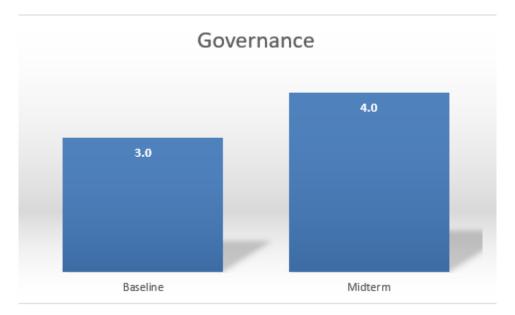


Figure 5: Progress on Governance Structure

4.1.1 Legal Status

The main objective was to establish if NAFPTA has a strong legal backing as an association recognized by the country's law.

NAFPTA has finalized and adopted their constitution with which the association is run. The association also has a legal status and has submitted all of the paperwork to changing their legal status to becoming an NGO. The association has developed its Administrative manuals to guide its day to day operations.

The Assessment Team scored NAFPTA an average of 5 which means that NAFPTA's Legal Status needs minor adjustments.



Figure 6: Progress on Legal Status

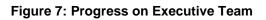
4.1.2 The Executive Team

The objective was to assess the competitiveness and transparency attached to recruiting members of the Executive Team and assess if the Executive Team is efficiently operationalizing the philosophy of NAFPTA.

As regards the Executive Team, the team realized that the national executives were currently performing their roles assigned to the Executive Team, and they perform their responsibility in implementing the philosophy of NAFPTA. Though there was no Board at the time of assessment, the Executive Team had developed Standard Operating Procedure documents to guide the team on their day to day activities. Members of the team (National Executives) were selected through a competitive and transparent process.



The Assessment Team scored NAFPTA an average of 4 which means that NAFPTA's Executive team though is good; needs to improve in some aspects.



4.1.3 Beneficiary Group

This was to assess if NAFPTA's beneficiary group was well-defined and to assess the effectiveness of NAFPTA's collaboration with their beneficiary group.

NAFPTA has a well-defined beneficiary group who are very aware and happy with the work of NAFPTA. NAFPTA has executives at the various levels to ensure that information and issues related to members are disseminated to members at all levels of the association. This allow members to actively participate in NAFPTA's planning processes and their suggestions are used to improve planning at the various levels.

The Assessment Team scored NAFPTA an average of 5 which means that NAFPTA's beneficiary group is well defined and are also seen as partners, but there is the need for minor adjustments

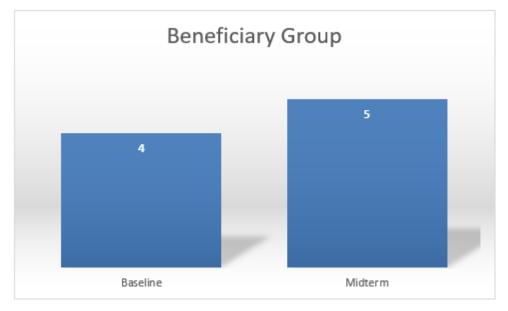


Figure 8: Progress on Beneficiary Group

4.1.4 Leadership

The objective was to assess the effectiveness and efficiency of NAFPTA's executive team as regards their roles and responsibilities, level of priority regarding participatory decision making, capacity building etc.

The leadership of NAFPTA has very clear understanding of their roles and responsibilities. On the issue of regular executive meeting, the executives have not been able to regularize for now due to lack of funds. However, anytime a program or activity brought the leadership together, the opportunity is always used to organize meetings among the leaders. During these meetings, all executives' participation is encouraged and decision making is transparent as stated by executives. There is also the encouragement of delegation of responsibilities to relevant members and executives.

The Assessment Team scored NAFPTA an average of 4 which means that NAFPTA's leadership is efficient though there is the need to improve some aspects such as;

• NAFPTA ensuring that meeting days and frequencies are normalized instead of being dependent on other activities



Figure 9: Progress on Leadership

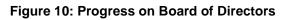
4.1.5 Board of Directors

The objective was to assess if NAFPTA has a Board of Directors to ensure that the policies and philosophies of NAFPTA are being implemented.

The assessment revealed that NAFPTA at the time of assessment did not have a Board of Directors. In their stead, the National Executives would be playing the roles of the Board until a substantive Board is instituted. Assessment of the Board of Directors was done with the roles of the national executives in mind. There is the need for NAFPTA to set up a Board to ensure efficiency and transparency in the running of activities of NAFPTA.

The Assessment Team scored NAFPTA an average of 4 which means that NAFPTA's Board of Directors need to improve some aspects.





4.1.6 Fiscal Committee

The main objective was to establish if NAFPTA had established a Fiscal Committee and to assess the effectiveness of their Fiscal Committee.

The assessment revealed that NAFPTA is yet to establish a Fiscal Committee to effectively play their roles at defining policies to ensure transparent accounting practices.

The Assessment Team scored NAFPTA an average of 1 which means that establishment of NAFPTA's Fiscal Committee needs very urgent attention.

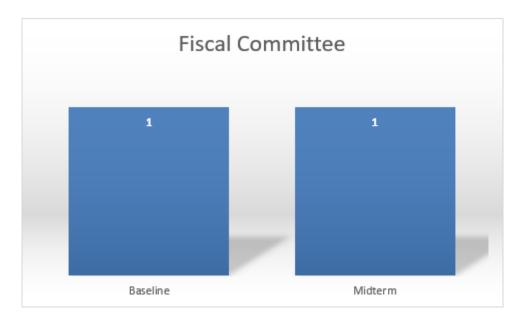


Figure 11: Progress on Fiscal Committee

4.1.7 Mission and Goal

This was to assess if NAFPTA has a well-defined Mission and Goal guiding the activities as an association, and whether beneficiaries had clear understanding of the Mission and Goal.

NAFPTA has a well-defined vision and mission that guides all of its work. Programs and activities carried out by NAFPTA are compatible with its Mission and Goal.

The Assessment Team scored NAFPTA an average of 4 which means that NAFPTA needs to improve some aspects of its Mission and Goals

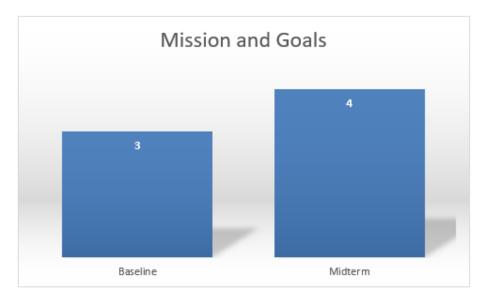


Figure 12: Progress on Mission and Goals

4.2 Human Resource

4.2.1 Staff

The objective of this assessment was to evaluate NAFPTA's recruitment processes for staff regarding job descriptions and to assess skills, experiences and talent of recruited staff as consistent with their mission and programs.

The Assessment Team observed that NAFPTA follows the recruitment processes which are now clearly defined and competitive. However, NAFPTA employees do not have written job descriptions that clearly define their task and reporting relations.

The Assessment Team scored NAFPTA an average of 3 which means that NAFPTA's recruitment procedure needs many improvements



Figure 13: Progress on staff employment

4.2.2 Staff Development

This was to assess NAFPTA's prioritization regarding staff development. NAFPTA offers staff the opportunity to attend trainings. However, NAFPTA has not been able to organize trainings for staff since trainings are contingent on donor allow ability, and availability of funding.

The Assessment Team scored NAFPTA an average of 2 which means that NAFPTA needs urgent attention in their Human Resource Development in areas such as;

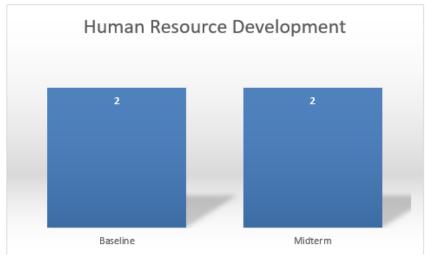
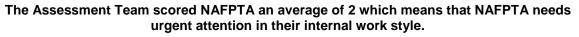


Figure 14: Progress on Staff Development

4.2.3 Internal Work Style

The objective was to assess NAFPTA's internal work style. The internal work style of NAFPTA is not very effective since the Association lacks enough funds to be able to bring staff and executives together for regular meetings.



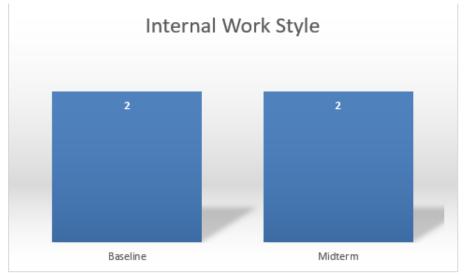


Figure 15. Progress on Internal Work Style

4.2.4 Supervision

This was to assess the effectiveness and efficiency of supervision and to assess NAFPTA's performance evaluation strategy of staff.

On the issue of supervision, though orientation and feedback was given to staff, there is no formal arrangement for such discussions. Also, there is no formal appraisal conducted for staff who work with NAFPTA. Though NAFPTA has developed procedure manuals, they are yet to be implemented for some of these issues to be resolved.

The Assessment Team scored NAFPTA an average of 2 which means NAFPTA needs urgent attention in its supervision.

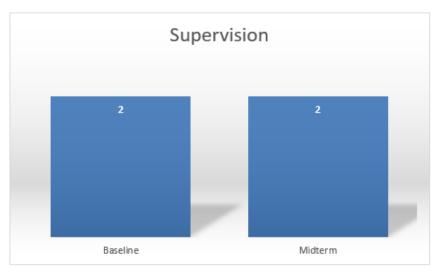


Figure 16: Progress on Supervision

4.2.5 Salaries and Benefits

The objective was to assess the competitiveness of salaries and benefits and assess the salary scale to know its practicability and applicability.

The assessment revealed that NAFPTA did not have competitive salaries and benefits.

The Assessment Team scored NAFPTA an average of 1 which means that NAFPTA's salaries and benefits issues need very urgent attention.



Figure 17: Progress on Salaries and Benefits

4.2.6 Gender Issues

The objective was to assess the even representation of men and women on the staff, within the Executive Team and on the Board and Fiscal Committee.

The assessment revealed that NAFPTA's gender issues in terms of representation of men and women on its staff and team is not even.

The Assessment Team scored NAFPTA an average of 2 which means that NAFPTA's gender issues need urgent attention.

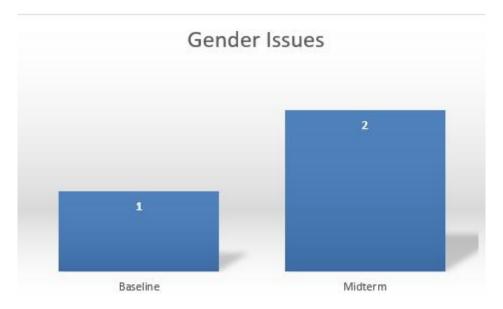


Figure 18: Progress on Gender Issues

4.2.7 Diversity Issues

The objective was to assess whether the management and staff understand and respect the habits and customs of the beneficiary.

The assessment revealed that NAFPTA's management and staff understand and respect the habits and customs of the beneficiary.

The Assessment Team scored NAFPTA an average of 5 which means that NAFPTA needs some minor adjustment.

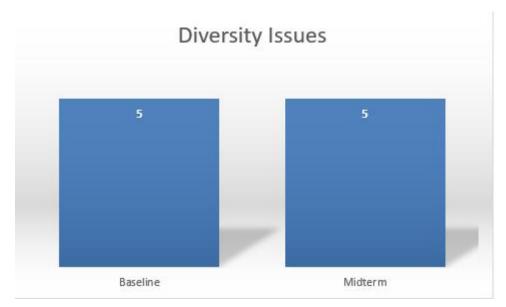


Figure 19: Progress on Diversity Issues

4.3 Financial Management

The objective of this section was to assess the robust nature of the accounting system, budgetary systems, financial control and inventory management systems of NAFPTA.

NAFPTA is still struggling to acquire and maintain an accounting system for managing its finances. The Association has developed the Financial Manual that would be used in managing the finances of the group, but this manual though finalized is yet to be implemented fully.

NAFPTA at the time of assessment did not have a Fiscal Committee for monitoring the finances of the group.

NAFPTA does not have a Financial Officer to monitor the finances of the Association. Though there are Financial Secretaries at the various levels of the Association, they are not very active in monitoring the finances of NAFPTA.

The Assessment Team scored NAFPTA an average of 2 which means that NAFPTA needs urgent attention regarding their financial management.



Figure 20: Progress on Financial Management

4.3.1 Accounting

The objective of this assessment was to determine whether NAFPTA has an accounting system in place for monitoring of transactions.

At the time of the assessment, NAFPTA did not have an accounting system in place for monitoring transactions.

The Assessment Team scored NAFPTA an average of 1 which means that NAFPTA needs very urgent attention regarding accounting.



Figure 21: Progress on Accounting

4.3.2 Budget

This was to assess whether activities of NAFPTA are ran according to budgets.

The assessment revealed that though NAFPTA has a budget for activities for the year, these activities are not carried out according to the planned budget. This is because most of the activities carried out by NAFPTA are dependent on donor allowability.

The Assessment Team scored NAFPTA an average of 3 which means that NAFPTA needs many improvements but without urgency regarding budget.

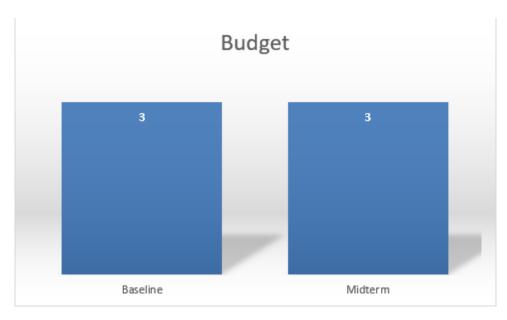


Figure 22: Progress on Sectoral Focus

4.3.3 Financial Control and Inventory Management

This assessment was to find out the level of financial controls and monitoring of financial activities of NAFPTA.

Though NAFPTA has developed the Financial Manual to monitor financial activities of the Association, it is yet to be implemented at the various levels of NAFPTA.

The Assessment Team scored NAFPTA an average of 3 which means that NAFPTA needs more improvements, but without urgency regarding their financial control and inventory management.



Figure 23: Progress of Financial Control and Inventory Management

4.3.4 Financial Report

The objective of this assessment was to find out if NAFPTA keeps track of its finances by keeping financial reports on activities and expenditure incurred during a particular period.

The assessment indicated that NAFPTA prepares periodic financial reports. However, NAFPTA's financial report does not follow the bank statements for reconciliations. The financial report does not also include a statement of expenses against budget.

The Assessment Team scored NAFPTA an average of 2 which means that NAFPTA needs urgent attention regarding their financial report.



Figure 24: Progress on Financial Report

4.4 Programs

4.4.1 Program Development

The objective of this assessment was to measure the level of beneficiary groups' involvement in program design and to assess the feasibility of program goals.

NAFPTA's beneficiary groups and other stakeholders are sometimes involved in the identification and design of programs for implementation at the various levels, but not all the time. The program plans do not have written annual plans to support the program at the various levels.

The Assessment Team scored NAFPTA an average of 3 which means that NAFPTA needs many improvements regarding program development, but without urgency.

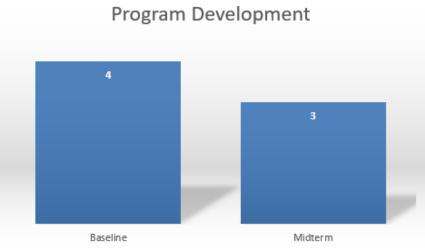


Figure 25: Progress on Program Development

4.4.2 Sectoral Expertise

This is the strongest asset that NAFPTA possesses. They are sectorally focused and do not have the intention of drifting off into other sectors. NAFPTA employees and executives are competent and recognized by their partners as highly skilled and credible in design and management of projects. Not much has changed as regards NAFPTA's sectoral expertise.

The Assessment Team scored NAFPTA an average of 5 which means that NAFPTA needs some minor adjustments regarding sectoral focus, but without urgency.



Figure 26: Progress on Sectoral Focus

4.4.3 Beneficiary Group Involvement

NAFPTA's priorities are defined in collaboration with representatives of the groups to be targeted. The beneficiary groups targeted are actively involved as trusted partners in planning and program implementation.

The Assessment Team scored NAFPTA an average of 4 which means that NAFPTA needs some minor adjustments regarding their beneficiary group.

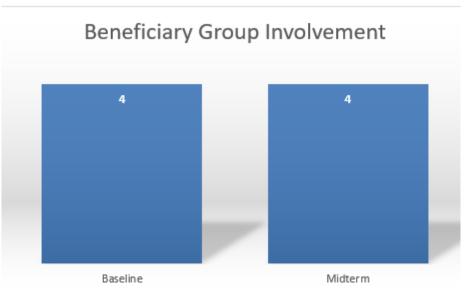


Figure 27: Progress on Beneficiary Group

4.4.4 Program Monitoring and Evaluation

The assessment indicated that NAFPTA does not have monitoring and evaluation measures in place to gather data from programs carried out. This makes it difficult to use data from previous programs to make program adjustments.

The Assessment Team scored NAFPTA an average of 2 which means there is the need for urgent attention regarding Program Monitoring and Evaluation.

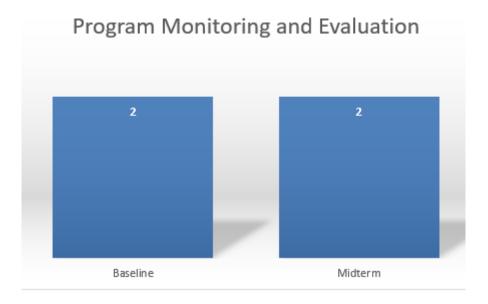


Figure 28: Progress on Program M&E

4.4.5 Program Reports

NAFPTA's executives prepare internal reports at least quarterly for internal programs organized. These reports are reviewed and approved by the National President. Since

NAFPTA at the moment receives funds through the Fisheries Commission (FC), these reports are submitted to the FC.

The Assessment Team scored NAFPTA an average of 4 which means NAFPTA needs to improve some aspect regarding Program Reports, but without urgency.

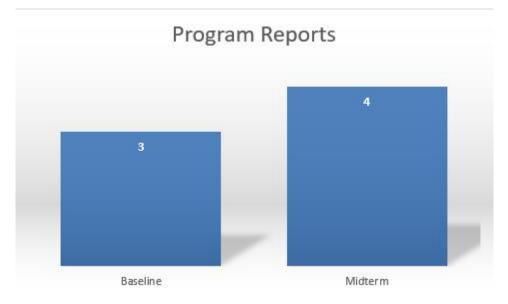


Figure 29: Progress on Program Report

4.5. External Relations and Partnerships

This was to assess the relationship between NAFPTA, its partner, Government Partners, Private sector and the media.

NAFPTA is doing well and is seen as credible in the eyes of so many partners. NAFPTA is not happy with some of the NGOs they work with. During the assessment, NAFPTA indicated that it is only SNV that has been helpful to the association in terms of external relations and partnership. NAFPTA complained that other NGOs see them as competitors and therefore there is friction between NAFPTA and some of these NGOs.

On the other hand, they are ready to apply new knowledge and are not afraid to do things in an unconventional way as long as they believe in it. Their partnership with SFMP/USAID has helped them tremendously to set up systems and structures to make NAFPTA a functional organization.

NAFPTA has strong relationship with government actors such as the Fisheries Commission at the various levels of governance; from national to the district levels.

The Assessment Team scored NAFPTA an average of 4 which means that NAFPTA needs to improve some aspects regarding their External Relationship and Partnership, but without urgency.

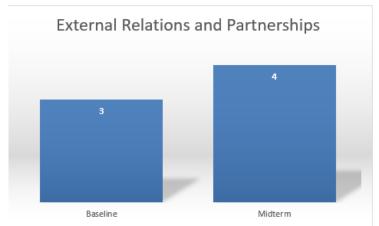


Figure 30: Progress on External Relationship and Partnership

4.6 Sustainability

The objective was to assess the strategy put in place by NAFPTA to ensure program, institutional and financial sustainability.

As regards the need to diversify their funding base, members of NAFPTA pay monthly dues. Discussions during the assessment indicated that NAFPTA members in Ashanti Region were active. This was because the president is proactive and innovative. She organizes training programs and meetings on her own with little resources. She also learns some means of alternative livelihoods like liquid soap production, and organizes training for members on what she learnt.

However, NAFPTA does not have a clear sustainability plan.

On the issue of institutional sustainability, NAFPTA has clear understanding of its role within its respective thematic areas. NAFPTA is also a member of networks with other organizations like MoFAD, MGC,MoL etc. who share its concern with the groups it targets. Not much has changed concerning NAFPTA's sustainability.

The Assessment Team scored NAFPTA an average of 3 which means that NAFPTA needs some minor adjustments regarding their External Relationship and Partnership



Figure 31: Progress on Sustainability

SECTION 5: GENERAL OVERVIEW OF THE ACTION PLAN

NAFPTA as an organization is doing very well to comply with the actions to be taken regarding organizational growth. Per the analysis from the action plan, it can be concluded that NAFPTA needs to put in more effort. As regards Governance, Programs and External Relationships, NAFPTA has implemented 32% of the agreed actions, with 19% of the agreed actions on-going; a total of 50% of actions under those domains. On compliance regarding actions on organizational sustainability, NAFPTA has complied so far by 33%, with 67% of the agreed actions yet to be implemented. For Financial Management, implemented action is 33%, with 34% on-going and 33% yet to be implemented; while for Human resource, compliance is 50%. Find below compliance per the trend analysis regarding the Action Plan for NAFPTA.





SECTION 6: CONCLUSIONS

Comparing the results from the baseline assessment with the results from the mid-term assessment, it can be realized that NAFPTA has been able to improve upon some of the issues identified in the baseline. NAFPTA however still has more to do since the percentage of actions undone outweighs that of actions completed. It is obvious that the leadership of NAFPTA is ready to ensure that the organization makes the optimum best out of the organizational capacity assessment. The progress is quite slow, but very steady and impressive. The Assessment Team will watch with keen interest the progress NAFPTA will make over the life of project. (LoP).

REFERENCES

Agbey, S. and Tsikata, S. (2015). Organizational Capacity Assessment (OCA Report for NAFPTA). pp. 28.

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