

# FINAL REPORT

## MANAGEMENT AND FUNCTIONAL REVIEW OF THE INDEPENDENT MEDIA COMMISSION (IMC)

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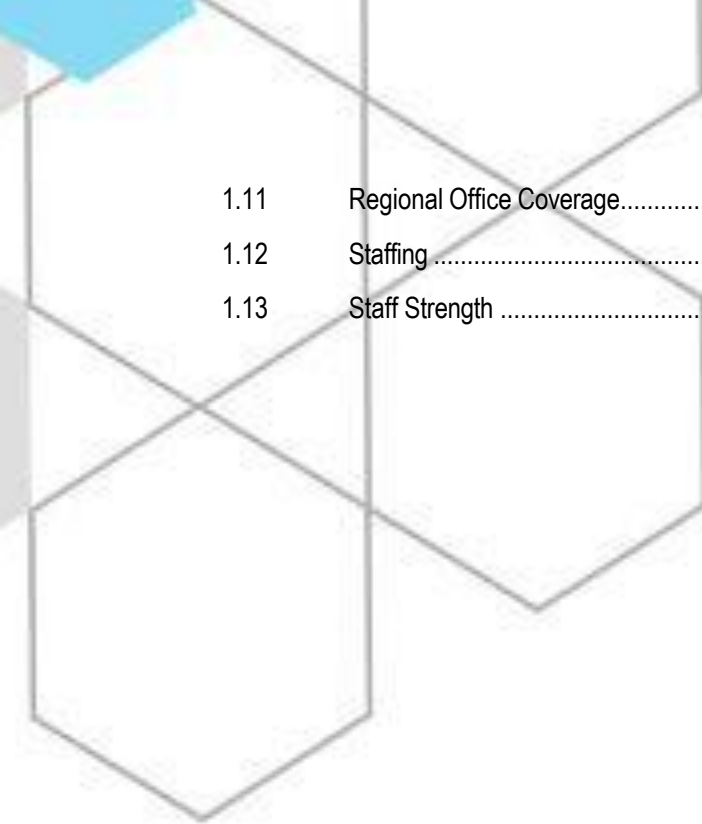
October 2025

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## Acronyms

CPD	Continuous Professional Development
CSOs	Civil Society Organizations
ES	Executive Secretariat
HRMO	Human Resources Management Office
ICASA	Independent Communications Authority of South Africa
ICT	Information Communication Technology
IMC	Independent Media Commission
IRC	Inter-Religious Council
IT	Information Technology
KIIs	Key Informant Interviews
MDAs	Ministries, Departments and Agencies
MFR	Management and Functional Review
MoICE	Ministry of Information and Civic Education
MoU	Memorandum of Understanding
MRCG	Media Reform Coordinating Group
NaTCA	National Telecommunications Authority
NGOs	Non-Governmental Organisations
NMC	National Media Commission
PSRU	Public Sector Reform Unit
SABC	South African Broadcasting Corporation
SLAJ	Sierra Leone Association of Journalists
SLBC	Sierra Leone Broadcasting Corporation
SWOT	Strengths, Weaknesses, Opportunities, and Threats
UNESCO	United Nations Educational Scientific and Cultural Organisations
WAN-IFRA	World Association of News Publishers

## Executive Summary


The Management and Functional Review (MFR) of the Independent Media Commission (IMC) of Sierra Leone was undertaken to assess the effectiveness, efficiency, and alignment of the Commission's structure, functions, and operations with its statutory mandate. The review aims to identify organizational strengths and gaps, recommend improvements, and ensure that the IMC is well-positioned to regulate the evolving media landscape in Sierra Leone in a more transparent, accountable, and responsive manner.

The Commission was established by an Act of Parliament in 2000 and subsequently amended in 2006 with the ultimate responsibility to serve as the regulatory body for print and electronic media in Sierra Leone. Its core mandate includes licensing, monitoring, and regulating media institutions and practitioners, promoting responsible journalism, and protecting media freedoms in line with democratic principles. The Commission also plays a pivotal role in resolving complaints against media institutions and safeguarding the public from unethical media practices.

The review found out that while the IMC has made significant contributions to media development and press freedom in Sierra Leone, several structural and functional limitations hinder its full operational potential. Key findings include the absence of critical functional positions such as an Internal Auditor and a Legal Officer, which compromises the Commission's ability to ensure sound financial management, legal compliance, and effective enforcement of media regulations. Additionally, the current organizational structure lacks clear reporting lines, leading to confusion in supervision, inefficiencies in workflow, and weakened accountability mechanisms.

There are also concerns regarding staffing turnover, overlapping roles, insufficient capacity in emerging media issues (such as digital media regulation and misinformation), and limited internal mechanisms for performance monitoring and institutional learning. Furthermore, the Commission's structure does not fully reflect modern regulatory best practices and lacks specialized units necessary to address contemporary media challenges.

In response to these findings, the review proposes a revised organizational structure that introduces key functional roles, clarifies reporting lines, career pathways and strengthens the Commission's operational systems. Recommendations also include capacity building for staff, updating internal policies and procedures, enhancing stakeholder engagement, and ensuring greater autonomy and resource mobilization to support the IMC's independence and effectiveness.



Overall, the MFR provides a roadmap for transforming the IMC into a more responsive, accountable, and forward-looking commission capable of effectively regulating Sierra Leone's dynamic media environment. The successful implementation of the recommendations will depend on strong leadership, political will, and strategic support from the government and Development Partners.

## Section One

### 1.1 Introduction

The Management and Functional Review (MFR) of the Independent Media Commission (IMC) of Sierra Leone has been commissioned by the Government of Sierra Leone, in collaboration with Development Partners, as part of the implementation of the recommendations arising from the Tripartite Agreement. This agreement is between the Government of Sierra Leone, the All People's Congress (opposition), and the Development Partners that emerged from high-level consultations aimed at strengthening democratic governance, promoting national cohesion, and enhancing institutional accountability in the country.

As part of the tripartite framework, a key recommendation was the need to undertake comprehensive reviews of key democratic and regulatory institutions, including the IMC, to ensure they are structurally and functionally equipped to deliver on their mandates effectively, independently, and in a manner that promotes public trust. In this regard, the MFR of the IMC is both timely and strategic, responding to increasing demands for credible and well-functioning oversight institutions in Sierra Leone's governance architecture.

The Independent Media Commission was established by an Act of Parliament in 2000 and amended subsequently as a principal regulatory body for print and electronic media in Sierra Leone. Its core responsibilities include licensing media houses and practitioners, monitoring content to ensure compliance with media codes of conduct, investigating public complaints against the media, and promoting responsible journalism. The Commission plays a pivotal role in safeguarding media freedom while ensuring that the media operate within the bounds of ethics and legality.

The Public Sector Reform Unit (PSRU) under the Office of the President is leading this review as part of its obligation to enhance governance, institutional performance, and service delivery across government Ministries, Departments, and Agencies (MDAs). The PSRU plays a strategic role in modernizing public sector institutions; ensuring that they function effectively and efficiently, are well-structured, and are equipped to meet their objectives. The mandate is to provide leadership, coordination, and strategic guidance in the design, implementation, and monitoring of Public Sector Reform Initiatives. The mission of PSRU is to facilitate the creation of a lean, performance-oriented, highly motivated, modern, and efficient Public Service that delivers high-quality services to the people of Sierra Leone in a timely and cost-effective manner. The vision is to create a Public Service that works for all in support of National Development.

This Management and Functional Review seeks to address recommendation seventy-six (76) of the Tripartite Agreement that underscores the commitment of all parties to promote electoral integrity, ensure public trust in electoral processes, and emphasize the need for electoral reforms in order to strengthen democratic governance and promote political stability.

This review seeks to address Recommendation seventy-six (76) of the Tripartite Report of 2024, which includes:

- Amend the Independent Media Commission Act to make the appointment of the Independent Media Commission Chair subject to a more transparent process than at present.
- Independent Media Commission powers should be reviewed to ensure there is sufficient power to enforce the Media Code of Conduct. The Code should also be reviewed, taking into account the role of social media in spreading hate speech during elections and whether sanctions are sufficient.
- The Independent Media Commission could usefully offer training for journalists on political and electoral matters, perhaps in conjunction with the Electoral Commission and Political Parties Regulation Commission.

By conducting this review, the PSRU aims to support the IMC in becoming a more responsive, autonomous, and efficient regulatory body capable of maintaining press freedom, ethical journalism, and a robust media landscape in Sierra Leone.

## **1.2 The Aim and Objectives of the MFR**

The overarching aim of the MFR process is to strengthen the Management and Operational systems of the Independent Media Commission of Sierra Leone in order to enhance its productivity and ensure effectiveness and efficiency in carrying out its mandate.

### **1.2.1 Specific Objectives of the MFR**

- Review the Mandate, responsibilities as well as management functions of IMC
- Examine IMC's Coordination, Collaboration and Communications efforts with Key Stakeholders and Citizens;
- Examine the organizational structure and staff mix of IMC to determine their degree of efficiency and effectiveness in delivering its mandate;
- Assess IMC's Technical and Administrative procedures, processes and facilities to determine efficiency and effectiveness in delivering on its Mandate;

- Identify capacity gaps and challenges within the management and operational functions of IMC that is impeding its effectiveness and efficiency;
- Proffer recommendations and suggestions to help IMC successfully deliver on its mandate;

### **1.3 Methodology and Approaches**

The Management and Functional Review (MFR) of the Independent Media Commission (IMC) employ a systematic and participatory approach to assess the effectiveness, efficiency, and overall functionality of the Commission. The methodology is designed to ensure an objective, evidence-based evaluation of the IMC's structure, operations, and regulatory role.

The review process involves a combination of qualitative and quantitative research methods, stakeholder consultations, institutional assessments, and benchmarking against international best practices. The following key methodologies were employed:

#### **1.3.1 Document Review and Desk Research**

A comprehensive review of relevant laws, policies, reports, and institutional documents was conducted to understand the legal and operational framework of the IMC. These included:

- The IMC Act, 2000 (as amended) to assess the IMC's mandate, legal authority, and functions as enshrined in the Act.
- The Strategic plan of IMC in order to analyse the institution's strategic direction, achievements, and challenges.
- Government Policies on Media Regulation – to align the review with national governance and public service reform objectives.
- Financial and Human Resource Reports in order to evaluate resource allocation, budget efficiency, and institutional capacity.

#### **1.3.2 Stakeholder Consultations and Key Informant Interviews (KIIs)**

A broad-based stakeholder engagement was conducted to gather insights on the IMC's performance, challenges, and opportunities for improvement. Stakeholders consulted included:

- IMC leadership and staff in order to assess internal governance, operational efficiency, and resource constraints.

- Media owners and journalists to adequately understand the regulatory environment, media freedom, and compliance issues.
- Government institutions (Ministry of Information and Civic Education; Sierra Leone Broadcasting Cooperation; and the Public Sector Reform Unit) – to align the IMC’s role with national governance priorities.
- Civil Society Organizations (CSOs) and Press Associations in order to evaluate perceptions of media independence and regulatory effectiveness.

### **1.3.3 Organizational and Functional Analysis**

The structure, governance, and internal operations of the IMC were assessed using:

- Organizational structure analysis – reviewing reporting lines, decision-making processes, and institutional effectiveness.
- Human resource and capacity assessment in order to evaluate staffing levels, skills gaps, and performance management.
- Financial and resource management review – assessing funding sources, budget utilization, and financial accountability.
- Operational process mapping – analysing how media licensing, compliance enforcement, and dispute resolution are managed.

### **1.3.4 Comparative Benchmarking and Best Practices Review**

A comparative analysis was conducted to benchmark the IMC’s regulatory framework and operations against similar media regulatory bodies in other countries. This helped identify best practices in media regulation, press freedom, and institutional governance that could be adapted to Sierra Leone’s context.

### **1.3.5 SWOT Analysis and Problem Identification**

A Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis was conducted to identify key institutional challenges and areas for improvement. This allowed for a focused approach in recommending structural and functional reforms.

### **1.3.6 Validation and Stakeholder Feedback**

A validation workshop was held to present preliminary findings and gather feedback from stakeholders, ensuring that the recommendations were practical, relevant, and aligned with the needs of the IMC and the media industry in Sierra Leone.

## Section Two

### Historical Background – IMC

#### 2.1 Historical Context

Sierra Leone's media landscape has a rich history, with the establishment of its first newspaper in 1801 and the inauguration of its first radio station in 1934. Despite this early development, the media sector faced numerous challenges, including limited resources and outdated equipment, a situation described by Professor Richard M'Bayo as "media poverty."

In the post-independence era, the media operated under restrictive laws, notably the Public Order Act of 1965, which criminalized certain forms of speech and posed significant limitations on journalistic freedom. This environment underscored the need for a regulatory body that could both promote media freedom and ensure responsible journalism.

#### 2.2 Establishment of the IMC

In response to these aforementioned challenges, the Independent Media Commission (IMC) was established by an Act of Parliament in 2000. The Commission was mandated to register, license, and regulate mass media institutions, encompassing both print and broadcast media. The primary objectives of the IMC include promoting a free and pluralistic media industry, ensuring efficiency in media services, fostering fair competition, protecting public interest against media exploitation, and supporting media research and human resource development.

#### 2.3 Legislative Evolution

The IMC's regulatory framework has evolved to adapt to the changing media environment. Significant amendments were made to the original Act in 2006 to enhance the Commission's effectiveness. A landmark development occurred in 2020 with the enactment of the Independent Media Commission Act, 2020 (Act No. 5 of 2020), which repealed and replaced the previous legislation. This Act reinforced the Commission's mandate to promote professionalism in media practice and provided for the development of a comprehensive Media Code of Practice, governing the establishment and operations of print, electronic media, and advertising.

#### 2.4 Repeal of the Criminal Libel Law

A significant milestone in Sierra Leone's media history was the repeal of the seditious libel provisions of the Public Order Act of 1965 in October 2020. President Julius Maada Bio signed the amended law, effectively decriminalizing libel and expanding the space for free speech and journalistic expression. This repeal was a

testament to the country's commitment to media freedom and was a pivotal moment for the IMC, as it underscored the need for robust self-regulation within the media industry.

Despite these advancements, the IMC continues to face challenges, particularly in adapting to rapid technological changes and the proliferation of digital media platforms. Ensuring compliance with regulatory standards in an era of social media and citizen journalism requires continuous adaptation and capacity-building. The Commission remains committed to addressing these challenges by enforcing regulations, promoting ethical journalism, and facilitating capacity-building initiatives to enhance the quality and credibility of media practitioners.

## 2.5 Vision Statement

The IMC's vision is to serve as one of the pillars of democracy by ensuring the sustenance of a free and pluralistic media in Sierra Leone.

## 2.6 Mission Statement

- To promote professionalism in the media throughout Sierra Leone
- To ensure that media institutions achieve the highest level of efficiency in the provision of media services.
- To promote fair competition among media institutions and persons engaged in the provision of media services.
- To protect the interests of journalists.
- To protect the interests of the public against exploitation or abuse of media institutions
- To promote technological research and development of adequate human resources for the advancement of the media industry throughout Sierra Leone

## 2.7 Mandate and Functions

The IMC's mandate is comprehensive, focusing on several key objectives:

**Promotion of Media Pluralism:** The Commission strives to foster a diverse media environment where multiple voices and perspectives can be heard, thereby enriching public discourse.

**Regulatory Oversight:** By registering and licensing media institutions, the IMC ensures that these entities operate within the legal frameworks established to maintain ethical standards and professionalism.

**Protection of Public Interest:** The Commission acts as a guardian of the public's rights, ensuring that media content does not exploit or misinform the populace.

**Encouragement of Fair Competition:** The IMC works to prevent monopolistic practices, promoting a level playing field for all media institutions.

**Support for Media Development:** Through research and capacity-building initiatives, the Commission aids in the advancement of media practices and the development of human resources within the industry.

These functions collectively aim to uphold the integrity of the media sector, ensuring it contributes positively to Sierra Leone's democratic processes.

## 2.8 Core Values of the IMC

The Independent Media Commission (IMC) of Sierra Leone is guided by core values that shape its regulatory functions and ensure a free, fair, and responsible media landscape. These values serve as the foundation for the commission's work in promoting ethical journalism, protecting press freedom, and fostering public trust in the media. These include:

### 1. **Independence**

The IMC operates as an autonomous body, free from political or commercial influence, to ensure objective and unbiased media regulation. Its independence allows it to uphold press freedom, enforce regulations fairly, and protect the rights of media practitioners without external interference.

### 2. **Fairness**

The IMC is committed to creating a level playing field for all media institutions, ensuring that policies and decisions are applied equitably. It promotes a balanced and just media environment where all stakeholders—journalists, media owners, and the public—are treated with impartiality and respect.

### 3. **Impartiality**

As a regulatory body, the IMC remains neutral in its oversight, ensuring that media institutions adhere to ethical and professional standards without bias. It upholds the principle of non-discrimination, ensuring that media organizations operate free from favoritism or undue influence.

### 4. **Integrity**

The IMC upholds the highest standards of honesty and ethical conduct in all its dealings. It ensures that media practitioners and institutions adhere to truthfulness, transparency, and accountability in their reporting, fostering public confidence in the media sector.

### 5. **Accountability**

The IMC holds both media institutions and itself accountable for their actions. It enforces compliance with regulations, provides mechanisms for public complaints, and ensures that journalists and media houses take responsibility for their content. The commission also operates transparently, maintaining public trust through responsible governance.

These core values guide the IMC in fulfilling its mandate of regulating the media sector while safeguarding press freedom, promoting ethical journalism, and ensuring that the media serves the public interest in Sierra Leone.

## **2.9 Guiding Principles**

The Independent Media Commission (IMC) of Sierra Leone is established to regulate and promote a free, responsible, and professional media landscape. Its mandate is guided by fundamental principles that ensure media institutions operate in a manner that upholds democracy, freedom of expression, and access to information while maintaining professionalism and accountability. These guiding principles include:

### **1. Democratization**

The IMC supports the development of a democratic society by ensuring that media institutions operate independently and contribute to good governance. It promotes open dialogue, public participation, and media freedom as essential pillars of democracy.

### **1. Freedom of Expression**

The IMC upholds the right to freedom of expression as enshrined in the 1991 Constitution of Sierra Leone and international conventions. It ensures that journalists and media institutions can operate without censorship or undue restrictions while encouraging responsible reporting.

### **1. Equality in Access to Information and Communication**

Recognizing that access to information is a fundamental right, the IMC ensures that all citizens have equal opportunities to receive and share information. It promotes fair access to media platforms, particularly for marginalized and underrepresented groups.

### **1. Professionalism and Responsibility**

The IMC encourages high standards of journalism by enforcing ethical codes of conduct, ensuring accuracy, fairness, and accountability in media content. Media practitioners are expected to uphold integrity, avoid misinformation, and serve the public interest responsibly.

### **1. Pluralism and Diversity**

The IMC promotes a media landscape that reflects the diverse voices, cultures, and perspectives within Sierra Leone. By encouraging plurality, the commission ensures that different viewpoints are represented and that no single entity dominates the media space.

These guiding principles serve as the foundation for the IMC's regulatory framework, ensuring that the media sector in Sierra Leone remains free, inclusive, responsible, and aligned with democratic values.

## Section 3

### Situation Analysis

#### 3.1 Overview

The Independent Media Commission (IMC) in Sierra Leone is the statutory body tasked with regulating the country's media sector. Established by the IMC Act of 2000, repealed and replaced by the 2020 Act, its mandate includes registering media outlets, monitoring content, enforcing ethical journalism, and navigating the evolving challenges of both traditional and digital platforms. While the repeal of criminal libel laws in 2020 marked a major milestone for press freedom, recent legislation such as the Cyber Security and Crime Act of 2021 has reignited debates about the limits of expression and state regulation in the digital age.

Despite notable progress, such as revised codes of practice and election coverage guidelines, the IMC faces significant operational challenges. It remains under-resourced, operating with a small staff and limited capacity to effectively oversee over 500 registered media outlets. Many of these outlets struggle with internal governance, economic instability, and limited reach, particularly in rural areas where radio remains dominant. The heavy reliance on government advertising revenue also threatens editorial independence, especially during politically sensitive times like elections.

The broader media landscape is further complicated by political tensions, security threats, and rapid technological change. Journalists frequently face harassment, especially in periods of unrest like the contested 2023 elections and the attempted coup. Meanwhile, the rise of digital media has introduced both opportunities for inclusivity and risks like misinformation. While reform initiatives and support from international partners have helped strengthen the sector, the IMC still requires strategic investments in staffing, digital monitoring tools, and policy frameworks to fulfill its mandate and support a resilient, independent media environment in Sierra Leone.

Furthermore, this section provides PESTLE, SWOT, stakeholders and comparative analysis of the Commission.

#### 3.2 PESTLE Analysis

Conducting a PESTLE analysis for the Independent Media Commission of Sierra Leone highlights the multifaceted environment in which the commission operates. By understanding these external factors, the IMC can develop more effective strategies to fulfill its mandate, promote a vibrant and independent media ecosystem that serves the interests of the Sierra Leonean populace.

## **Political Factors**

The IMC operates within a framework dictated by national laws and policies on media governance. Changes in government or political stability can significantly affect the functionality of the Commission. The political environment in Sierra Leone has a direct influence on the independence, effectiveness, and public perception of the IMC. The IMC plays a crucial role in monitoring media behavior during elections, which places it at the center of politically sensitive situations. Pressure from political parties or state actors can challenge its neutrality. Some media outlets are openly partisan, further complicating the Commission's task of enforcing fair and balanced journalism. For instance, the attempted coup in November 2023 and the contested 2023 elections demonstrate that political instability can disrupt media regulation, threaten journalists, and constrain the Commission's operations. Also, the level of government support for independent media initiatives may impact the commission's ability to promote a free and fair media landscape. The prevailing political environment, including public trust in media and political parties' attitudes toward the press, shapes the work of the IMC

## **Economic Challenges**

The media industry in Sierra Leone is currently facing significant economic challenges. Many media outlets struggle with financial instability, leading to difficulties in maintaining operations and ensuring quality journalism. This economic strain affects the IMC's regulatory functions, as financially distressed media houses may prioritize survival over adherence to ethical standards. The Media Reform Coordinating Group (MRCCG) has highlighted these systemic challenges and emphasized the need for sustainable investment to revitalize the media sector.

The growth of the media industry can lead to increased advertising revenue and job creation. However, economic downturns can result in reduced investment in media, affecting the IMC's initiatives and programs. The emergence of new media outlets, including digital platforms, can create competition that influences traditional media and necessitates adaptive regulatory measures.

## **Social Factors**

The level of public trust in media and perceptions of journalistic integrity can influence the effectiveness of the IMC's regulatory functions and initiatives. Sierra Leone is culturally diverse, and media representation of various social groups is essential for fostering national unity and understanding. The IMC must ensure equitable coverage across different demographics, as the degree of media literacy among the population

affects how individuals consume media. Consequently, the Commission may need to promote awareness of media ethics and critical consumption of information to empower the public.

### **Technological Advancements and Information Disorder**

The rise of digital media platforms has transformed information dissemination in Sierra Leone. While this shift offers opportunities for broader reach, it also presents challenges such as the spread of misinformation and "information disorder." The Commission must adapt its regulatory frameworks to address these issues effectively, ensuring that both traditional media and digital platforms adhere to ethical standards without infringing on freedom of expression.

Moreover, the level of technological access, particularly in rural areas, impacts the reach of media outlets and the IMC's initiatives; therefore, expanding internet access and digital literacy is vital for inclusive media consumption. Thus, with the advent of social media, concerns about data privacy, security breaches, and the spread of fake news present challenges that the IMC must address through updated regulations.

### **Legal and Regulatory Factors**

The IMC operates within a legal framework encompassing various laws that regulate media practices, freedom of expression, and censorship. Changes or reforms in these laws significantly affect the commission's mandate. However, the repeal of the criminal libel laws in 2020 marked a significant advancement for press freedom in Sierra Leone. The introduction of the Cybersecurity and Crime Act in 2021 has raised concerns among journalists and media practitioners about press freedom and free expression. While aimed at enhancing cybersecurity, certain provisions of the Act are perceived as potential threats to freedom of expression. The IMC faces an overlap of functions in the enforcement of this law with the protection of journalists' rights.

The Commission must align local media regulations with international human rights standards regarding freedom of expression and press freedom, to influence its operational guidelines.

### **Environmental Factors**

The IMC can encourage sustainability in media practices, including environmentally responsible reporting and the promotion of content related to environmental issues. The commission may need to address media coverage of climate change and its effects in Sierra Leone, ensuring that environmental issues are adequately represented in the media landscape. Environmental regulations can also affect how media companies operate, particularly regarding resource consumption and waste management.

In summary:

<b>PESTLE Factor</b>	<b>Key Issues</b>
<b>Political</b>	Autonomy concerns, political pressure, electoral role, security threat
<b>Economic</b>	Budget constraints, media viability, donor dependence
<b>Social</b>	Low media literacy, youth engagement, institutional trust
<b>Technological</b>	Digital disruption, monitoring limitations, cyber security threats
<b>Legal</b>	Regulatory overlaps, press freedom vs. cyber security, weak enforcement
<b>Environment</b>	Disaster impacts, climate journalism needs, green office practice

The IMC operates in a highly dynamic environment shaped by political sensitivities, economic instability, digital disruption, and evolving social expectations. While the Commission has a strong legal mandate, its ability to deliver is constrained by external structural forces and internal resource limitations. A robust strategic response informed by the PESTLE analysis is necessary to position the IMC as an adaptive, credible, and forward-looking regulator in Sierra Leone’s growing media ecosystem.

### 3.3 SWOT Analysis

<b>Strengths</b>	<b>Weaknesses</b>
<p><b>1. Clear Legal Mandate:</b></p> <p>The IMC operates under a robust legal framework, including the IMC Act (as amended in 2020), which empowers it to regulate and promote ethical standards in the media landscape.</p> <p><b>2. Professional Credibility:</b></p> <p>The IMC is widely recognized as an authoritative and impartial media regulator, enhancing its credibility among journalists, media houses, and the public.</p>	<p><b>1. Inadequate Financial Resources:</b></p> <p>The IMC faces significant constraints in financing, affecting its ability to conduct comprehensive monitoring, enforcement, and outreach.</p> <p><b>2. Outdated Infrastructure and Equipment:</b></p> <p>Limited access to modern ICT tools and data management systems affects timely</p>

<i>Strengths</i>	<i>Weaknesses</i>
<p><b>3. Experienced Personnel:</b></p> <p>The Commission benefits from a pool of experienced professionals with deep knowledge of media law, ethics, and journalism.</p> <p><b>4. Nationwide Presence:</b></p> <p>The IMC has established regional offices; recruited District Monitors in order to improve its ability to monitor and regulate media practices beyond the capital.</p>	<p>monitoring, processing of complaints, and public engagement.</p> <p><b>3. Weak Enforcement Mechanisms:</b></p> <p>Despite its legal mandate, the Commission often lacks the authority or resources to enforce sanctions effectively, especially against politically connected media outlets.</p> <p><b>4. Limited Public Awareness and Engagement:</b></p> <p>Many citizens and media practitioners are unaware of the IMC’s functions and complaint procedures, reducing public participation and trust.</p> <p><b>5. Fragmented Regulatory Coverage:</b></p> <p>Emerging digital platforms and social media outlets often fall outside the Commission’s effective regulatory reach, creating gaps in oversight.</p> <p><b>6. Established Institutional Framework:</b></p> <p>The Commission has an existing organizational structure with no clear career progression.</p>
<i>Opportunities</i>	<i>Threats</i>
<p><b>1. Digital Media Regulation:</b></p> <p>The growing influence of online media offers an opportunity for the IMC to expand its regulatory reach through new legislation or policy reforms.</p> <p><b>2. Capacity-Building Partnerships:</b></p>	<p><b>1. Political Interference:</b></p> <p>Perceived or actual political influence in appointments or decision-making can undermine the Commission’s independence and credibility.</p> <p><b>2. Rapidly Evolving Media Landscape:</b></p>

<i>Strengths</i>	<i>Weaknesses</i>
<p>Potential partnerships with international media development organizations (e.g., UNESCO, WAN-IFRA, Article 19) can support training, funding, and technical assistance.</p> <p><b>3. Media Law Reform:</b></p> <p>Ongoing legal and policy reforms in the media sector, including the repeal of criminal libel laws, provide a platform for strengthening media freedom and regulatory effectiveness.</p> <p><b>4. Public Demand for Media Accountability:</b></p> <p>Increased public interest in transparency, fact-checking, and ethical journalism enhances the relevance of the IMC’s role.</p> <p><b>5. Technological Advancements:</b></p> <p>Adoption of media monitoring tools, databases, and case management systems can improve the Commission’s efficiency and responsiveness.</p> <ol style="list-style-type: none"> <li>1. Media freedom is constitutionally protected (section 25 of 1991 constitution)</li> <li>2. Investment in the media due to reforms especially the repeal of the criminal libel law</li> </ol>	<p>The fast-paced growth of social media, citizen journalism, and digital broadcasting challenges the Commission’s traditional regulatory frameworks.</p> <p><b>3. Misinformation and Hate Speech:</b></p> <p>The proliferation of fake news and hate speech online poses regulatory and reputational risks, especially during elections or national crises.</p> <p><b>4. Insecurity and Threats to Journalists:</b></p> <p>Media practitioners often face intimidation or violence, which can limit open reporting and hinder the IMC’s mandate to protect media freedoms.</p> <p><b>5. Low Compliance Among Media Houses:</b></p> <p>Some media outlets do not comply with registration requirements, ethical standards, or licensing procedures, limiting regulatory effectiveness.</p>

### 3.4 Stakeholders Mapping

The Independent Media Commission (IMC) functions within a complex media governance ecosystem. Strengthening collaboration with key institutional stakeholders is essential for effective regulation, promotion of media freedom, and responsible journalism in Sierra Leone. The following is a detailed analysis of IMC’s strategic relationships with four key stakeholders.

#### 3.4.1 Ministry of Information and Civic Education (MoICE)

The Ministry serves as the parent body providing policy direction and administrative oversight to the media and communication sector. It plays a critical role in media policy development,

legislative reform, and funding allocations to the IMC. Although the IMC operates independently, its mandate is derived from legislation and strategic policies tailored by MoICE.

#### **3.4.2 Sierra Leone Broadcasting Corporation (SLBC)**

SLBC, the state-owned broadcaster, is regulated by the IMC to ensure compliance with ethical broadcasting standards and the media code of practice. It is also a key player in public information dissemination and civic education.

#### **3.4.3 National Telecommunications Authority (NaTCA)**

NaTCA regulates the telecommunications sector, including spectrum allocation and broadcasting frequencies. Its mandate intersects with the IMC on the regulation of broadcasting services, especially radio, television, and emerging digital platforms. However, the review noted that jurisdiction overlap, especially regarding digital broadcasting and the absence of a joint digital media regulatory strategy is a challenge between the two entities in collaborating and coordinating their activities.

#### **3.4.4 Sierra Leone Association of Journalists (SLAJ)**

SLAJ is the primary professional body for journalists and a key stakeholder in media self-regulation, ethical conduct, and advocacy for press freedom. It collaborates closely with the IMC in promoting responsible journalism and resolving complaints. Occasionally, there is a challenge between the Commission and SLAJ in the area of disciplinary actions over journalists.

In enhancing the effectiveness of the IMC, it requires a deliberate and sustained coordination with sectoral stakeholders. Establishing formal frameworks such as MoUs, joint task forces, and regular policy roundtables will ensure synergy, reduce regulatory overlap, and promote a coherent media governance framework. A shared commitment to independence, professionalism, and public accountability should underpin these collaborative efforts.

### **3.5 Comparative Analysis**

Media regulation plays a crucial role in ensuring press freedom, professional ethics, and responsible journalism. Across Africa, countries have established media regulatory bodies to oversee broadcasting, print, and digital media. This analysis compares the Independent Media Commission (IMC) of Sierra Leone with similar commissions in Ghana, Kenya, and South Africa, focusing on legal frameworks, regulatory mandates, governance structures, operational

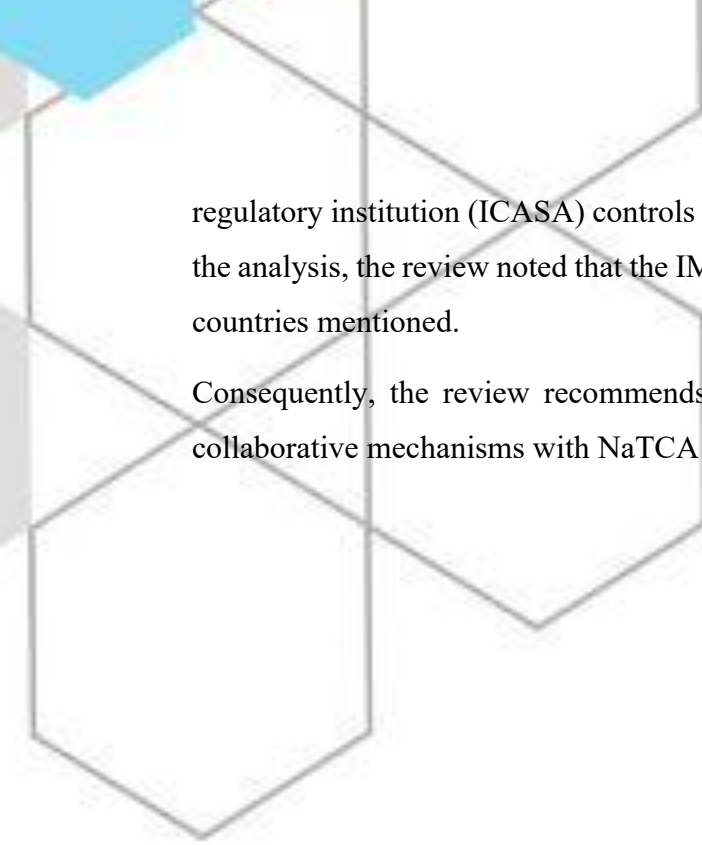
effectiveness, and challenges. The table below gives a snap-shot of countries/commissions under consideration.

<b>Thematic Areas</b>	<b>Sierra Leone</b>	<b>Kenya</b>	<b>Ghana</b>	<b>South Africa</b>
<b>Legal Framework</b>	<b>Independent Media Commission Act 2020 (IMC Act 2020)</b>	Media Council Act 2013 (MCA 2013)	<b>National Media Commission Act 1993 (NMC Act, 1993)</b>	<b>(ICASA Act, 2000 &amp; Broadcasting Act, 1999)</b>
<b>Regulatory Body</b>	Independent Media Commission (IMC)	Media Council	National Media Commission (NMC)	Independent Communications Authority of South Africa (ICASA)
<b>Mandate</b>	Regulate and promote a free and responsible media; ensure high journalistic standards; register and license media institutions; monitor compliance; and handle complaints.	Accredit journalists and register media houses. Handle complaints through the Media Complaints Commission. Develop and enforce a Code of Conduct for media practitioners.	Promote and ensure the freedom and independence of the media; ensure the highest journalistic standards; insulate state-owned media from governmental control; appoint governing bodies of state-owned media; and register newspapers and other publications.	Regulate broadcasting, telecommunications, and postal services; ensure compliance with policies and regulations; and manage the broadcasting frequency spectrum. The Broadcasting Act provides a charter for the South African Broadcasting Corporation (SABC) and outlines broadcasting policy.
<b>Appointment of Commissioners</b>	Commissioners are nominated by various professional bodies and institutions, with some appointed by the President and the	The councils members are recruited by various professional bodies and	Members are nominated by various professional bodies and institutions, with some appointed	ICASA Council members are appointed by the President on the recommendation of the National Assembly.

<b>Thematic Areas</b>	<b>Sierra Leone</b>	<b>Kenya</b>	<b>Ghana</b>	<b>South Africa</b>
<b>Legal Framework</b>	<b>Independent Media Commission Act 2020 (IMC Act 2020)</b>	Media Council Act 2013 (MCA 2013)	<b>National Media Commission Act 1993 (NMC Act, 1993)</b>	<b>(ICASA Act, 2000 &amp; Broadcasting Act, 1999)</b>
	Minister of Information and Civic Education.	institutions, The shortlisted names are forwarded to the Cabinet Secretary responsible for information and communications, who appoints one chairperson and six members	by the President and Parliament.	
<b>Appointment of Chairman</b>	Appointed by the President in consultation with the Sierra Leone Association of Journalists and subject to the approval of parliament, which may influence perceived independence.	The chairperson is appointed by the Cabinet Secretary responsible for information and communications	The Commission elect one of its members as Chairman	Appointed by the President, on the recommendation of the national assembly.
<b>Funding</b>	Funded through government allocations and fees from media licensing and registration.	Funded through government allocations, fees levied on accreditation and grant and partnership	Administrative and operational expenses are charged on the Consolidated Fund.	Funded by money appropriated by Parliament and fees collected from the services it regulates.
<b>Sanctioning Powers</b>	Empowered to impose fines, suspend, or revoke licenses of media institutions that violate regulations.	Empowered to impose fines, suspension or deregistration of media institutions,	Primarily focuses on mediation and settlement of complaints; does not have direct sanctioning powers like	Authorized to impose fines, issue orders, and revoke licenses for non-compliance. The Broadcasting Act also outlines penalties for offenses.


Thematic Areas	Sierra Leone	Kenya	Ghana	South Africa
Legal Framework	<b>Independent Media Commission Act 2020 (IMC Act 2020)</b>	Media Council Act 2013 (MCA 2013)	<b>National Media Commission Act 1993 (NMC Act, 1993)</b>	<b>(ICASA Act, 2000 &amp; Broadcasting Act, 1999)</b>
			license revocation.	
<b>Protection of Press Freedom</b>	Aims to promote a free and pluralistic media.	Promoting and protecting the freedom and independence of the media. Upholding and maintaining high professional standards in the media industry. Ensuring the right of journalists to operate freely and without undue interference.	Explicitly mandated to promote and ensure the freedom and independence of the media; insulated from governmental control.	The Broadcasting Act emphasizes the independence of the broadcasting system and the need for varied and comprehensive programming that reflects South African attitudes, opinions, ideas, values, and artistic creativity.
<b>Scope</b>	Regulates both print and electronic media.	Gives accreditation and registration of Journalist and media institutions	Focuses on mass media, including print and electronic media.	ICASA regulates broadcasting, telecommunications, and postal services. The Broadcasting Act specifically addresses broadcasting services and policies.

From the above table, the IMC of Sierra Leone shares similarities with media commissions across Africa, particularly in regulatory scope and challenges. However, governance structures, autonomy levels, and enforcement powers vary, particularly in South Africa, where the media



regulatory institution (ICASA) controls the media, telecommunications, and postal services. From the analysis, the review noted that the IMC in Sierra Leone has better practices than the other three countries mentioned.

Consequently, the review recommends that the IMC strengthen its operational functions and collaborative mechanisms with NaTCA and its related bodies in the sector.



## Section Four

### The Structure of IMC

#### 4.1 Overview

The Independent Media Commission (IMC) was established by the IMC Act of 2000, as amended in 2006 and 2020, to regulate and promote a free, pluralistic, and responsible media landscape in Sierra Leone. The Commission is mandated to register and monitor the operations of print and electronic media institutions, enforce ethical standards, and adjudicate complaints against the media.

The IMC is a statutory body with independent regulatory powers, although it functions within the broader public sector oversight framework under the supervision of the Ministry of Information and Civic Education. Its structure is guided by statutory provisions and further defined by internal regulations and administrative procedures.

The apex governance body of the IMC is the Board of Commissioners, which provides strategic oversight, policy direction, and adjudicates high-level matters concerning the media sector. The Board is composed of individuals nominated by key stakeholder institutions, ensuring representation from civil society, media practitioners, academia, and government.

#### 4.2 The Composition of the Board

According to section 3 (1) of the IMC Act, 2020, the Board is composed of the following members:

- A Chairperson (appointed by the President upon recommendation)

Representatives from:

- Sierra Leone Association of Journalists (SLAJ)
- Civil society organizations
- Legal professionals (e.g., Sierra Leone Bar Association)
- Academic institutions (e.g., Mass Communication departments)
- The Ministry of Information and Civic Education
- The Inter-Religious Council

- The Independent Radio Network

#### **4.2.1 Functions of the Board**

- Approving media license applications and renewals
- Issuing policy directives and ethical codes
- Presiding over complaints and disciplinary hearings
- Ensuring compliance with the IMC Act and media regulations

#### **4.2.2 Executive Secretariat (ES)**

The day-to-day operations of the IMC are managed by a Secretariat, headed by the Executive Secretary, who is the chief administrative officer responsible for implementing the decisions of the Board and managing staff and resources. The ES performs additional functions:

- Reports directly to the Board.
- Coordinates institutional activities and stakeholder engagement.
- Manages administrative and technical staff.

#### **4.2.3 Technical and Administrative Units**

The Secretariat is structured into various functional units, each with defined roles. These include:

1. Monitoring, Research, and Project Unit
2. Account and Procurement Unit
3. Library, Records and Resource Unit
4. IT Unit
5. Human Resource Unit
6. Regional Offices

#### **4.2.4 Regional Offices**

The regional offices of the IMC are integral to its operations, as they serve as the bridge between the commission and local media entities. To enhance nationwide coverage, the IMC has established regional offices in key parts of the country. These regional offices ensure the following:

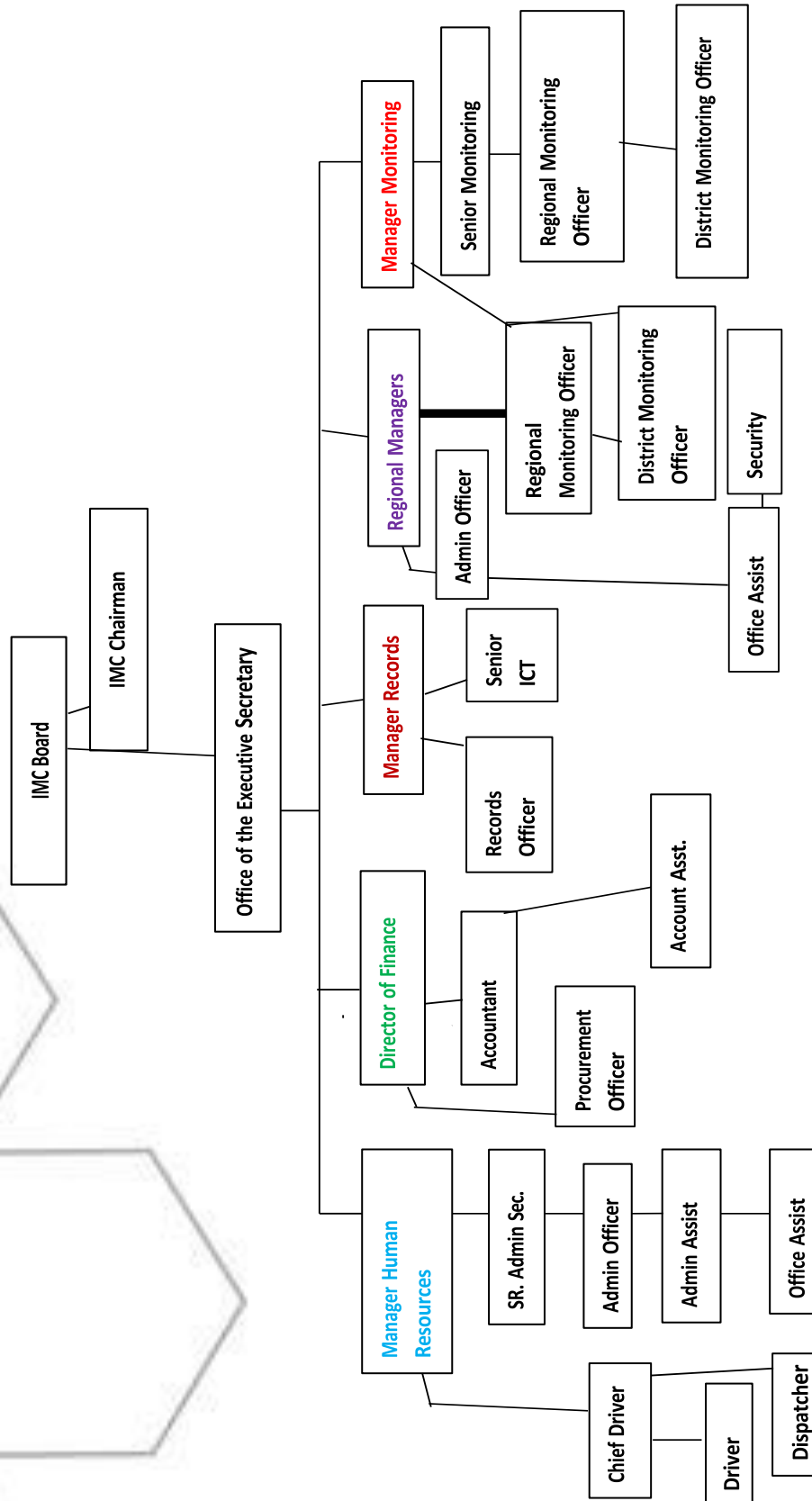
- Monitoring media institutions at the district and provincial levels.

- Liaise with local journalists, civil society, and the public.
- Report to the Central Secretariat for coordination and oversight.
- Monitoring media compliance with national laws and regulations.
- Providing training and support to local media practitioners.
- Engaging with community stakeholders to promote media literacy.
- Addressing complaints and issues related to media operations at both district and regional levels.

**Based on the above units, the current organogram of the Commission is depicted in Figure 1 below.**

Figure 1: Current Organizational Structure of IMC

THE INDEPENDENT MEDIA COMMISSION ORGANOGRAM/ ORGANIZATIONAL CHART



## **Findings**

An analysis of the current organizational structure shown above exposed a number of weaknesses, including lack of clearly defined career pathways, making promotion and growth of officers difficult

Again, the current organizational structure of the IMC lacks well-defined reporting lines, which creates ambiguity in supervision, weakens accountability, and hampers efficient decision-making.

Furthermore, the absence of an internal auditor in the current organisational structure creates a significant gap in financial oversight and accountability. Given the Commission's critical role in regulating the media sector, there is a need for robust internal audit mechanisms to ensure transparency, compliance with financial regulations, and efficient use of public resources. Establishing an internal audit unit or position will enhance internal control systems, mitigate financial risks, and promote donor confidence.

Additionally, the IMC enforces regulations, monitors media conduct, and addresses violations of media codes. However, the lack of a dedicated legal officer or department undermines the Commission's ability to effectively interpret laws, draft regulations, handle litigation, and provide legal advice. A legal function is essential for defending the Commission's actions in court, handling complaints legally, and ensuring that its decisions align with national laws and international human rights standards.

Therefore, a well-designed organizational structure will ensure clear delineation of roles and responsibilities, avoid duplication of functions, and enhance coordination across units or departments. By proposing a revised structure, the Commission can address overlaps, fill functional gaps, and realign its workforce with current operational realities and strategic goals.

Figure 2: Proposed Organisational Structure of the IMC

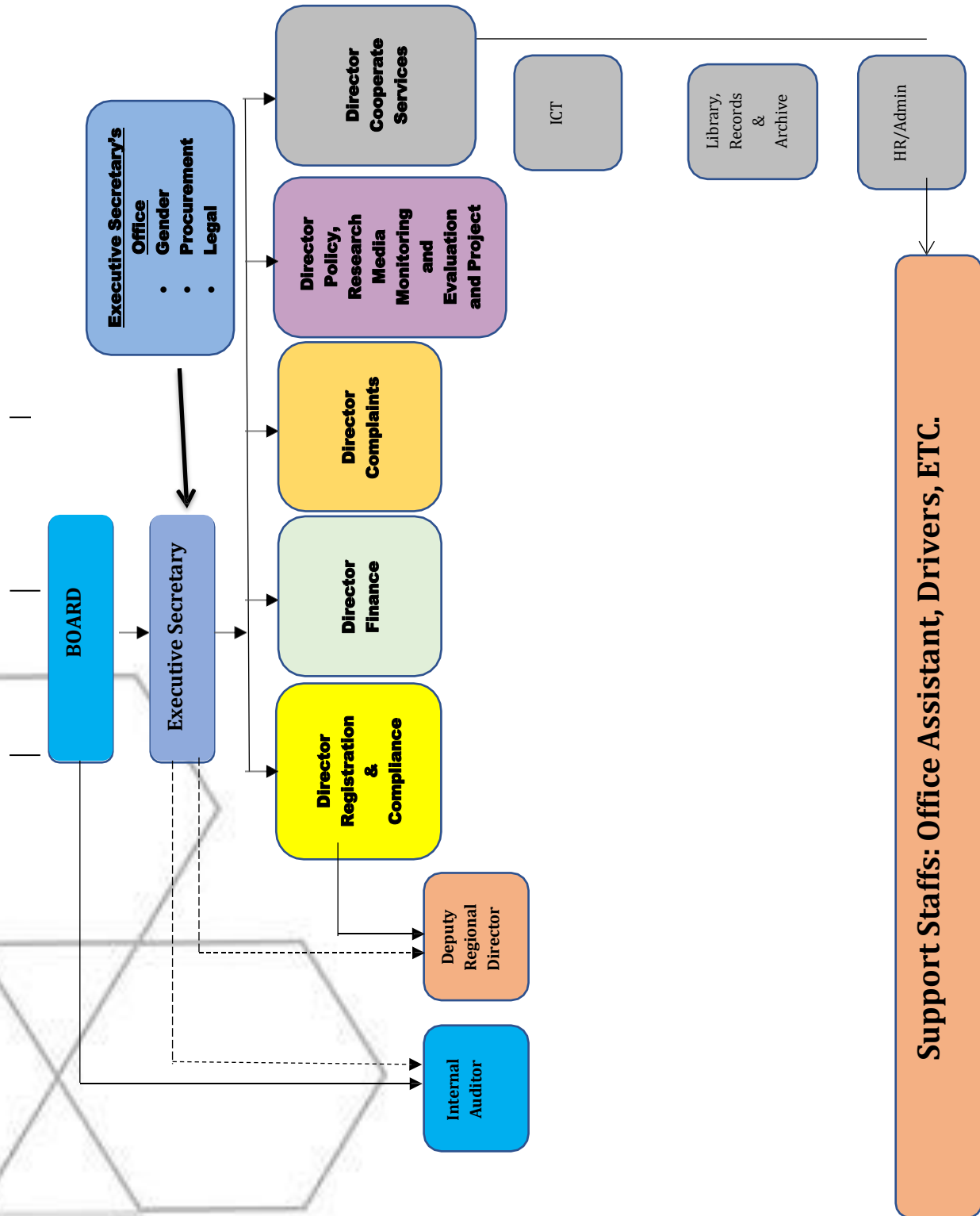
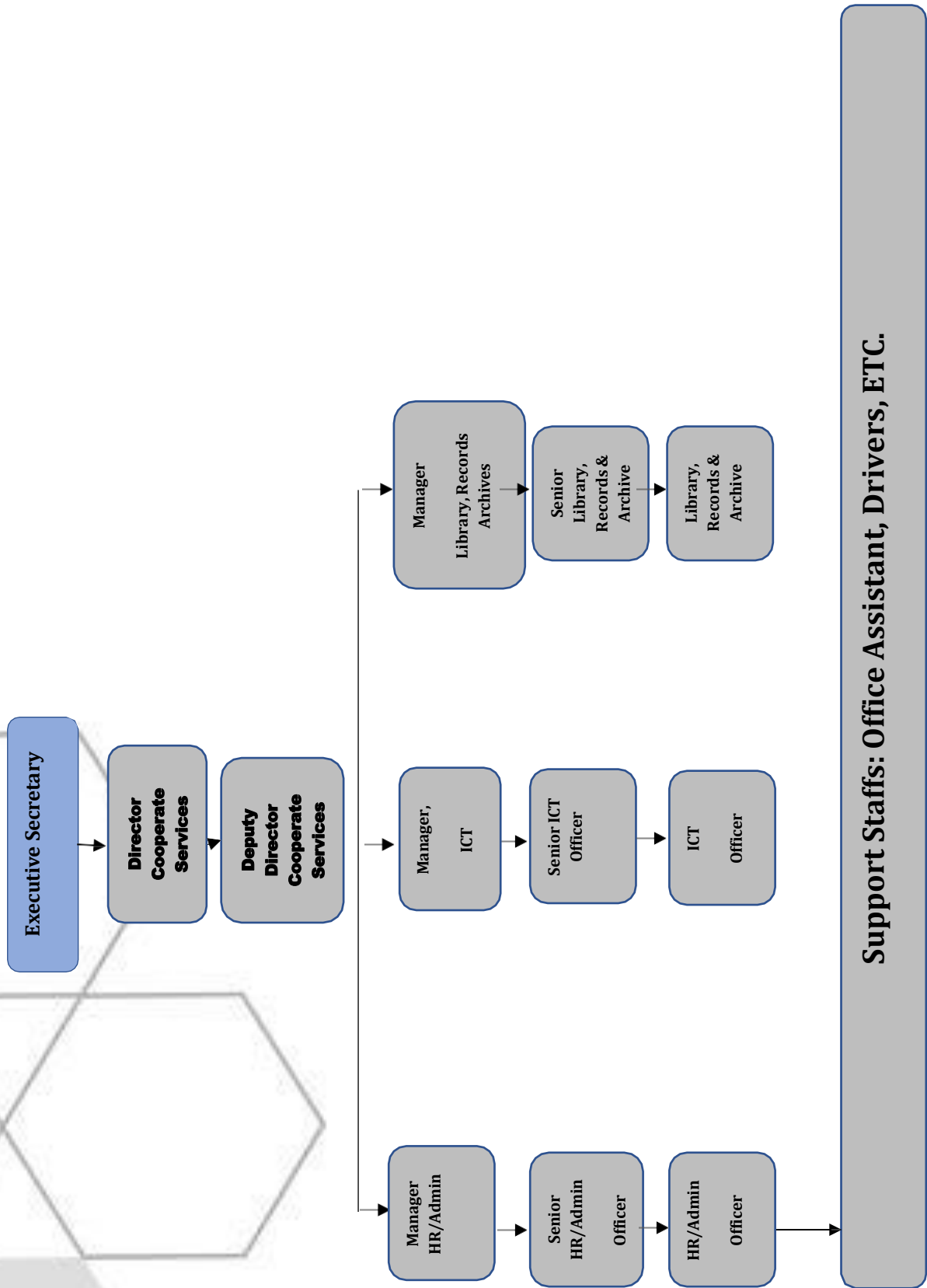
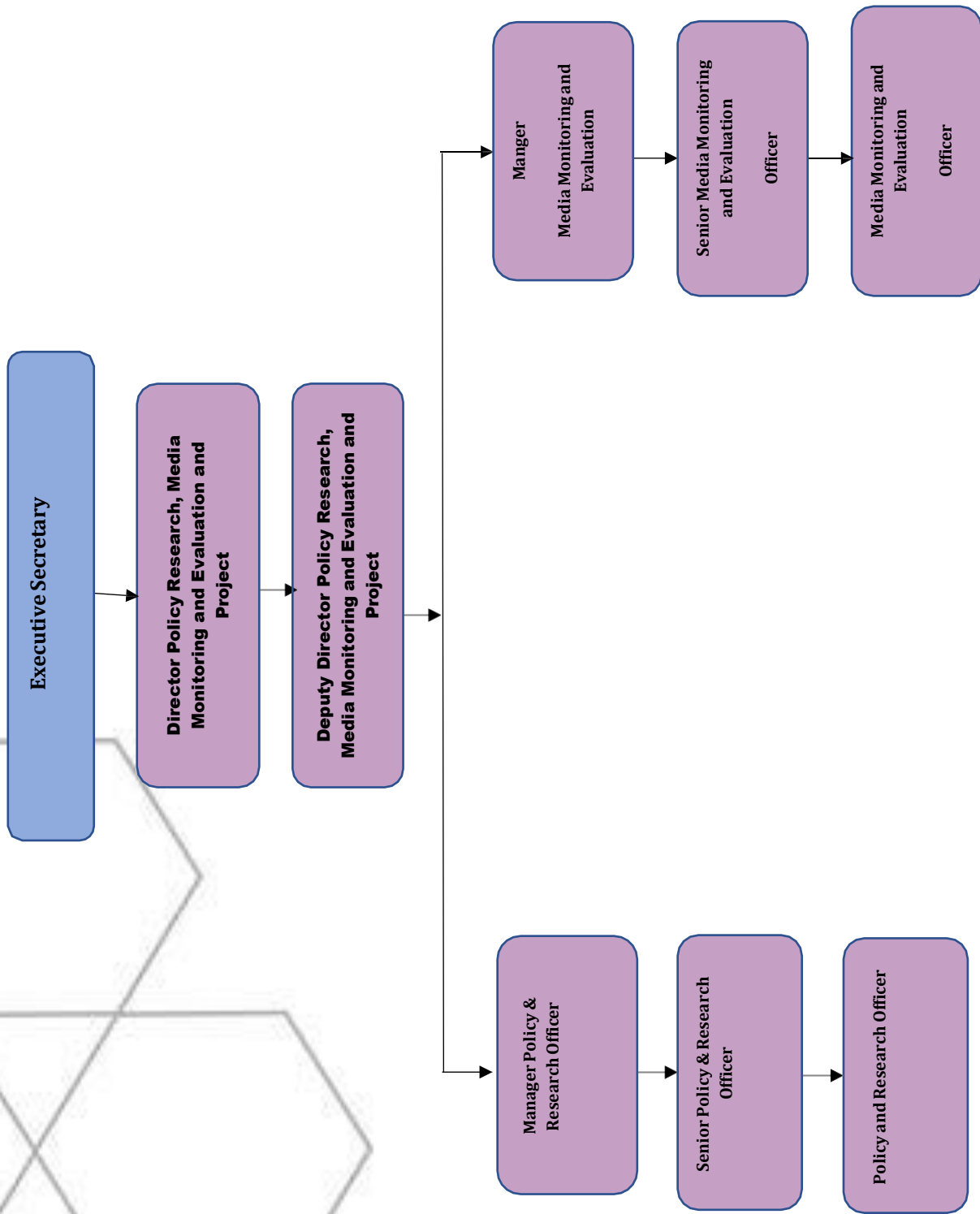


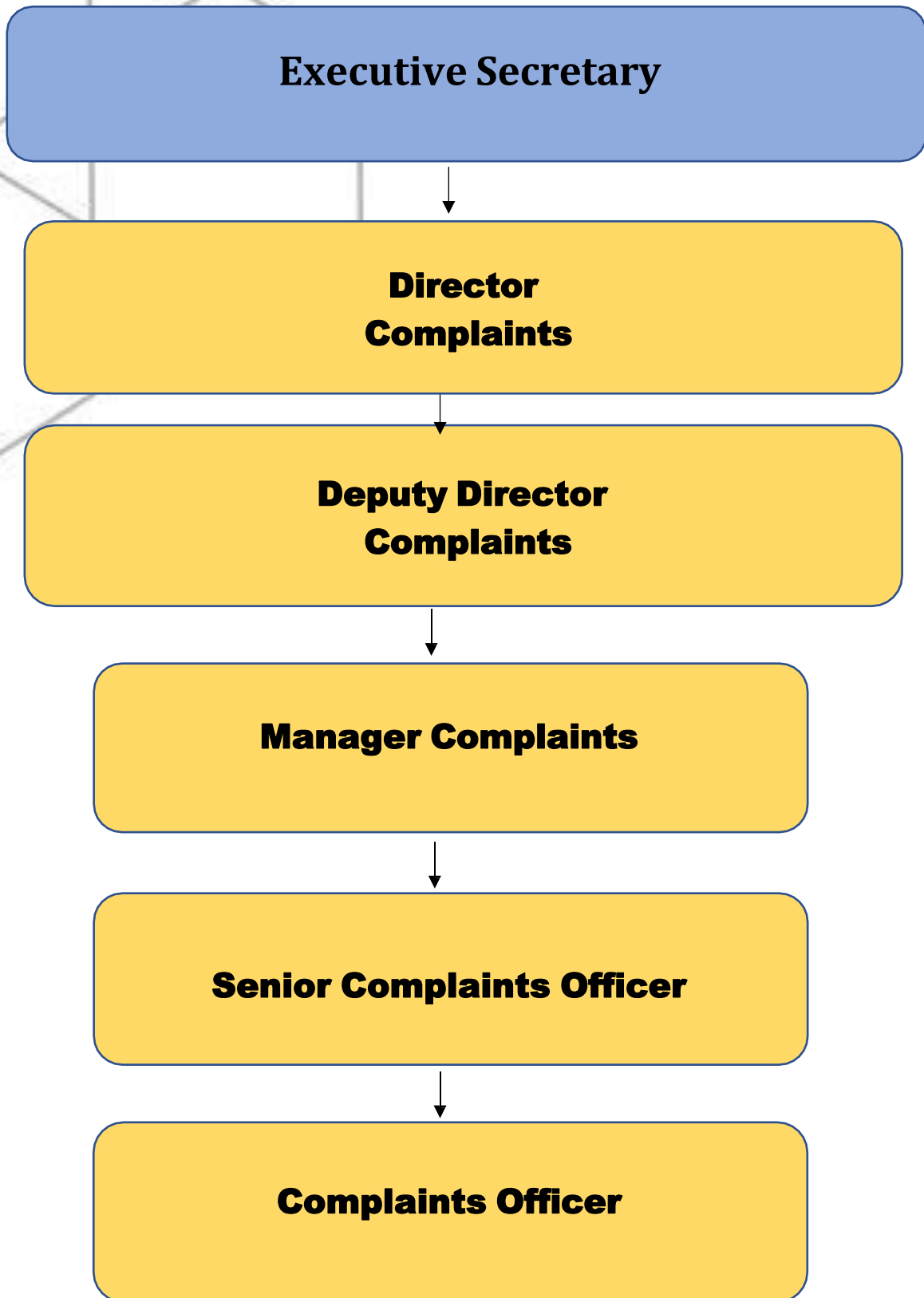
Figure 3: Cooperate Services



**Figure 4: Monitoring, Evaluation, Research and Project**



*Figure 5: Complaints*



*Figure 6: Finance*

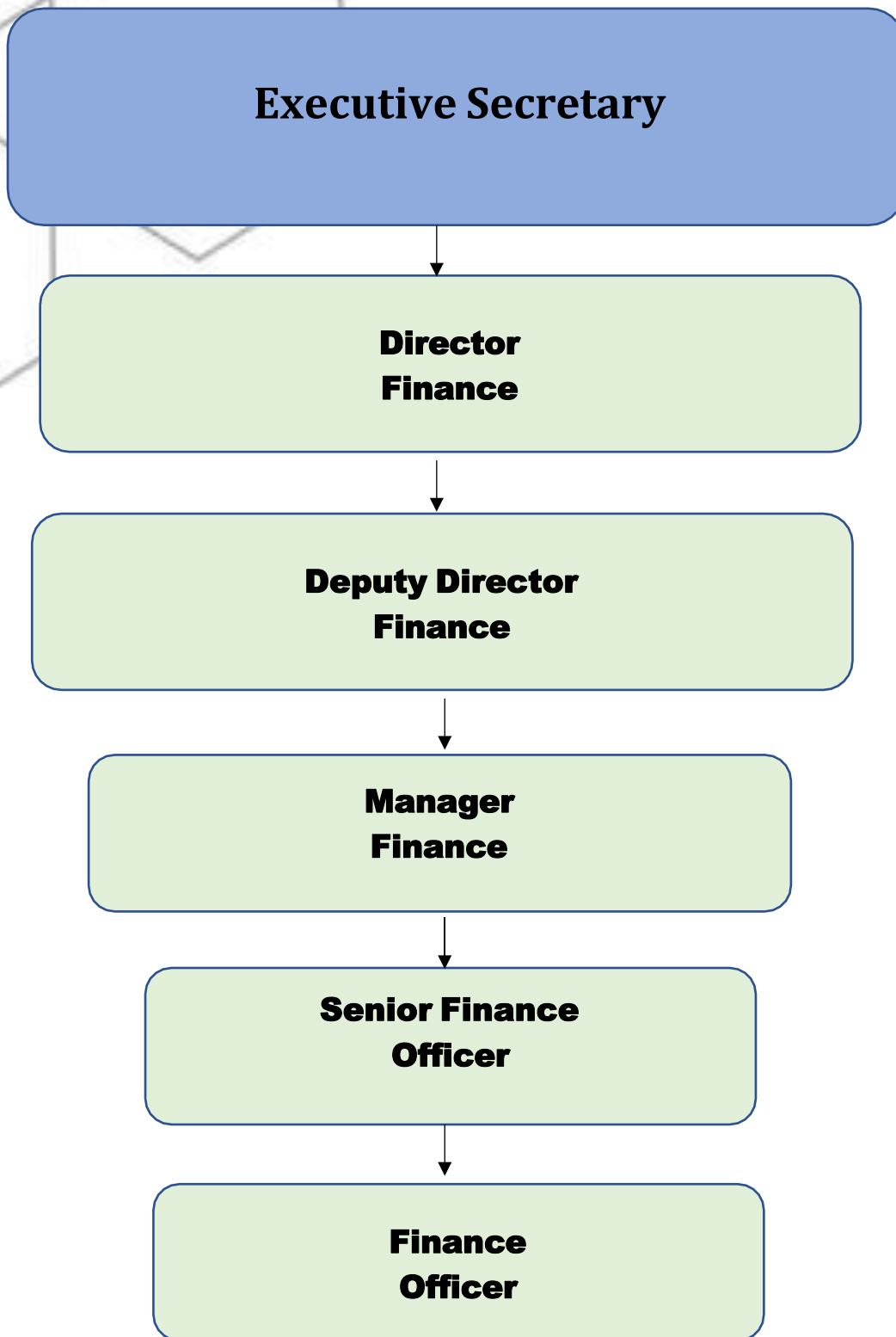
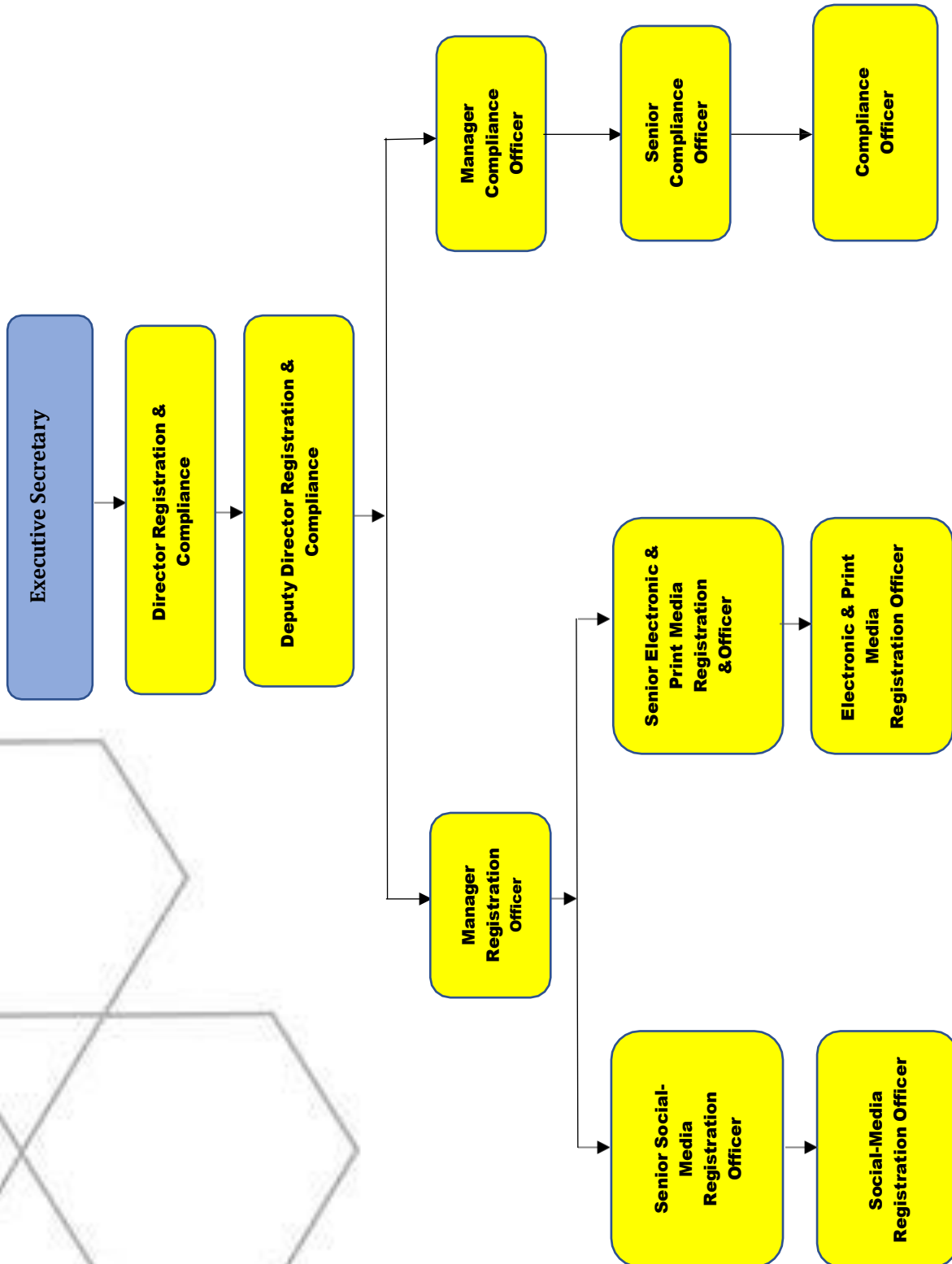


Figure 7: Registration and Compliance



## **Functions for the Proposed New Directorates**

- **Directorate of corporate services**

The Directorate is charged with the responsibility of providing strategic and operational support services to ensure the effective functioning of the Commission. It coordinates human resource management, administration and general office services. This Directorate ensures that institutional systems, policies, and procedures promote efficiency, transparency, accountability, and staff development in line with public sector standards and best practices.

- **Directorate of media, monitoring, evaluation, research and project**

The Directorate is responsible for overseeing media content standards and assessing the performance and impact of the media sector. It conducts systemic monitoring of print, broadcast, and digital media to ensure adherence to professional, ethical, and regulatory standards, it also undertakes research, evaluations, and special projects to inform evidence-based policy making, sector reforms, and strategic planning.

- **Directorate of legal and complaints**

The Directorate of Legal and Complaints provide legal advisory services and manages the receipt, investigation, and resolution of complaints against media institutions and practitioners. It ensures that the Commission's regulatory actions are grounded in law, due process, and respect for freedom of expression. It also promotes fair, timely, and transparent dispute resolution while safeguarding the rights of the public and media practitioners.

- **Directorate of finance**

The Directorate of Finance is responsible for the financial management and sustainability of the Commission. It ensures prudent planning, budgeting, accounting, and reporting of financial resources in compliance with public financial management laws and international best practices. The Directorate supports informed decision making by providing timely and accurate financial information.

- **Directorate of registration, accreditation and compliance**

The Directorate is responsible for regulating entry and continued participation in the media sector. It oversees the registration and accreditation of media institutions and practitioners, and ensures ongoing compliance with statutory, regulatory, and ethical requirements. This Directorate plays a pivotal role in promoting professionalism, accountability, and standards within the media landscape.

- **Directorate of regional outfit**

The Directorate is responsible for decentralizing the Commission's regulatory and support functions to the regions. It ensures effective outreach, monitoring, compliance, and stakeholder engagement at the sub national level. This Directorate strengthens the Commission's presence across the country and promotes equitable access to regulatory services.

## Section Five

### Analysis of Critical Findings and Recommendations

#### 5.1 Introduction

The IMC is critical in regulating Sierra Leone's media landscape, but significant legal, operational, and logistical gaps affect its effectiveness. Addressing issues relating to the IMC Act, overlapping functions, coordination, logistics, visibility, enforcement mechanisms, and terms and conditions of staff will enhance its efficiency. By implementing these recommendations, the IMC will improve regulatory effectiveness, stakeholder engagement, and institutional sustainability.

#### 5.2 Regulatory and Legal Framework

The Independent Media Commission (IMC) of Sierra Leone operates under a statutory mandate established by the Independent Media Commission Act, 2000, which was later repealed and replaced in 2020 to strengthen its regulatory scope and independence. The Act provides the IMC with the legal authority to register, license, regulate, monitor, and promote ethical standards in the media landscape of Sierra Leone. It empowers the Commission to issue licenses, enforce codes of practice, and adjudicate complaints against media institutions and practitioners.

#### Findings

The current legal framework shows some gaps and challenges that limit the Commission's full effectiveness. Firstly, certain provisions in the Act do not adequately address the complexities of the evolving digital and social media environment, such as the lack of adherence of the media regulations code of conduct to regulate media platforms, online journalism, and citizen reporting, leaving significant room for misinformation and unregulated content. Also, the enforcement mechanisms embedded in the Act are often weak, with limited punitive measures to deter violations. This undermines the Commission's ability to ensure media houses adhere to professional standards.

Moreover, overlaps and ambiguities exist between the IMC's mandate and that of other state and non-state actors, creating confusion over jurisdiction and enforcement roles.

#### Recommendations:

- **Review and Update the Legal Framework:** There is an urgent need to revise the IMC Act 2020 to reflect modern media practices, especially in the areas of digital media regulation, online journalism, and data protection.
- **Strengthen Enforcement Provisions:** Amend the Act to include clearer sanctions and enforcement mechanisms that promote compliance and deter violations, while ensuring due process and protection of press freedom.
- **Clarify Institutional Mandates:** Clearly delineate the roles and responsibilities of the IMC in relation to other bodies, such as NaTCA, to enhance collaborative operational functions and to prevent regulatory overlaps and conflicts.

- Promote Stakeholder Engagement: The review of the legal framework should involve broad consultation with media practitioners, civil society, and the legal community to ensure the revised law is inclusive, relevant, and enforceable.
- Review the Code of Conduct: There is an urgent need to review the Code of Conduct to enhance its effectiveness and relevance. This will effectively promote ethical journalism, accountability, media independence, and ensure there is sufficient power for the IMC to enforce the Media Code of Conduct.

### 1.2.1 Appointment of the IMC Chairman

According to Section 3 of the IMC Act 2020, the Chairman is appointed by the President of Sierra Leone in consultation with SLAJ and subject to the approval of Parliament. However, the review noted that consultation was not sufficiently done in the appointment of the chairman.

#### Recommendation

- The review **recommends** that the appointment of the chairman should be done by the President after the nomination by SLAJ and approved by parliament, as stated in section 3 of the IMC Act 2020.

#### Finding

The review noted that the current organizational structure lacks clearly defined career pathways, making promotion and growth of officers difficult. Again, the current organizational structure lacks well-defined reporting lines, which creates ambiguity in supervision, weakens accountability, and hampers efficient decision-making. Furthermore, the absence of an internal auditor in the current organizational structure creates a significant gap in financial oversight and accountability.

#### Recommendation

The review recommends that the Commission adopt and implement the proposed structure to realign its workforce with current operational realities and strategic goals.

### 1.3 Training for Journalists on Political and Electoral Matters

The Independent Media Commission (IMC) recognizes the necessity of providing targeted training for journalists to equip them with the skills and knowledge needed to report accurately and responsibly on political and electoral activities. This speaks in conjunction with recommendation 76 of the tripartite.

Historically, the IMC has conducted training programs for journalists focused on various aspects of political and electoral reporting. These programs aim to improve journalists' understanding of electoral processes, enhance their reporting skills, and ensure ethical standards are upheld in political journalism. However, the review noted the following:

- Inadequate Training Coverage:

The review revealed that most of the journalists did not receive comprehensive training on electoral laws and political reporting, leading to gaps in their understanding of critical issues affecting electoral integrity.

- **Limited Resources and Capacity:**

The review noted that the IMC's training programs often face budgetary constraints, limiting the scope and frequency of training sessions. This lack of resources restricts the ability to reach a broader audience of journalists, especially in rural areas.

- **Lack of Tailored Training Programs:**

The review also noted that training offerings have not been sufficiently tailored to address the needs of different segments of journalists, including those in print, broadcast, and online media. A one-size-fits-all approach may not adequately meet the diverse needs of journalists.

### **Recommendations**

- **Expand Training Coverage:**

The IMC should develop a more comprehensive training curriculum that addresses not only electoral laws but also the broader context of political reporting. This curriculum should be regularly updated to reflect changes in laws and emerging issues.

- **Increase Funding and Resources:**

Advocacy for increased funding from the government and international partners is essential. This funding should specifically support the development and delivery of training programs, enabling the IMC to reach more journalists across the country.

- **Tailor Training Programs:**

Develop specialized training modules for different types of journalists (e.g., print, broadcast, online) to ensure that the training is relevant and applicable to their specific reporting contexts. This could involve working with media associations to identify needs and customize content accordingly.

## **1.4 Terms and Conditions of Service**

The terms and conditions of service for staff of the Independent Media Commission (IMC) are a critical aspect of institutional effectiveness, as they directly influence staff motivation, retention, and overall performance.

### **Findings:**

The review noted that the Commission's salary structure is not competitive when compared to similar Commissions or institutions within the sector. This has contributed to high staff turnover, low morale, and difficulties in attracting and retaining skilled professionals, especially in specialized areas such as legal affairs, media monitoring, compliance, and digital communication.

In addition, the Commission lacks a comprehensive and harmonized condition of service document that clearly outlines employment grades, salary scales, promotion procedures, performance appraisal systems, and disciplinary processes. This has led to inconsistencies in staff treatment and created uncertainty regarding job security, career progression, and benefits.

**Recommendations:**

- **Review Salary and Benefits Structure:** The salary scales and allowances should be reviewed and benchmarked against similar regulatory bodies and the local job market to ensure fairness and competitiveness.
- **Review the Terms and Conditions of Service:** The IMC should urgently review and adopt a standardized and transparent terms and conditions of service document, aligned with public service regulations, competitive enough to attract and retain qualified personnel.

## **1.5 Coordination and Collaboration**

Effective coordination and collaboration are essential for the Independent Media Commission (IMC) to fulfill its regulatory mandate in promoting responsible journalism, safeguarding media freedom, and ensuring ethical media practices in Sierra Leone.

**Findings:**

However, the Commission's current coordination and collaboration mechanisms with key stakeholders, including government ministries, media associations, civil society, security agencies, and international partners, are limited.

The absence of structured platforms for regular dialogue and joint planning has weakened information sharing, policy alignment, and collective responses to emerging media challenges such as misinformation, cyber abuse, and regulatory compliance. Collaboration with the Ministry of Information and Civic Education, the Sierra Leone Association of Journalists (SLAJ), and other sector actors remains largely ad-hoc, reactive, and project-based rather than strategic and institutionalized.

**Recommendations:**

- **Establish Formal Coordination Mechanisms:** The IMC should institutionalize regular coordination forums with key stakeholders such as SLAJ, civil society organizations, donor agencies, security bodies, and relevant MDAs to promote synergy and alignment on media regulation and development issues.
- **Develop Strategic Partnerships:** Strengthen collaboration with development partners, academia, and international media regulatory bodies to access technical expertise, capacity-building support, and global best practices. Create structured dialogue platforms that allow proactive engagement on emerging challenges such as digital media regulation, misinformation, and media ethics.

## **1.6 Equipment and Logistics**

**Findings:**

The IMC lacks modern monitoring and regulatory tools, affecting its ability to track media content efficiently. Insufficient office space and outdated equipment hinder operational efficiency. Moreover, inadequate transportation and field monitoring logistics impact IMC's ability to regulate regional media houses. Field monitoring is often delayed or inconsistent due to limited transportation resources, including the limited availability of functional vehicles and motorcycles for regional offices.

**Recommendations:**

- Invest in advanced media monitoring software and technology for real-time content regulation.
- Upgrade IMC's office infrastructure and IT systems to improve efficiency.
- Provide adequate vehicles and logistics support to enable nationwide media monitoring.

### **1.7 IMC Visibility and Public Awareness**

Visibility and public awareness are essential for the Independent Media Commission (IMC) to effectively carry out its regulatory, advisory, and promotional roles within Sierra Leone's media landscape. As the Commission responsible for ensuring ethical and professional standards in media practice, the IMC must be widely recognized and understood by both media practitioners and the general public.

**Findings:**

The Commission's visibility and public awareness of its mandate, services, and decisions remain limited, especially outside the capital and in underserved communities. Many media practitioners, civil society groups, and members of the public are often unaware of the IMC's complaint-handling processes, licensing regulations, and its role in upholding media standards. The commission has minimal presence on digital platforms, which restricts its outreach activities.

**Recommendations:**

- Conduct regular public awareness campaigns to educate citizens and media practitioners about IMC's mandate.
- Enhance IMC's digital presence through active social media engagement and an updated website.
- Organize regular stakeholder forums and press briefings to improve visibility.

### **1.8 Communication and Public Engagement Strategy**

An effective Promotion, Communication, and Public Engagement Strategy is essential for the Independent Media Commission (IMC) to strengthen its visibility, build public trust, and ensure that media regulation is understood and respected by all stakeholders. As the media landscape in Sierra Leone evolves, the IMC must not only regulate but also proactively communicate its role, decisions, and services to the public, media practitioners, and government partners.

**Findings:**

- IMC lacks a structured communication strategy for engaging the public and media stakeholders.
- Weak promotional activities result in low stakeholder involvement in regulatory processes.
- There is an inadequate feedback mechanism between IMC and media houses.

**Recommendations:**

- Develop and implement a comprehensive communication strategy outlining clear engagement mechanisms.
- Establish a feedback and complaint resolution platform for media houses and journalists.
- Strengthen media literacy programs to educate journalists and the public on media laws and ethics.

**1.9 Monitoring and Enforcement**

Effective monitoring allows the Commission to track the content and conduct of media houses, ensuring that they operate within the legal and ethical frameworks established by national laws and regulations. Without consistent monitoring, violations such as misinformation, hate speech, unverified reporting, and unethical practices can go unchecked, potentially undermining public trust and social stability. Enforcement complements monitoring by ensuring that breaches are addressed through timely corrective actions — including warnings, sanctions, license suspensions, or revocations.

**Findings:**

- IMC lacks real-time content tracking tools, making enforcement reactive rather than proactive.
- Inconsistent enforcement of media regulations raises concerns about bias.
- Some media houses defy IMC directives without facing consequences.

**Recommendations:**

- Invest in driven media monitoring tools to enhance real-time content regulation.
- Establish clear and transparent enforcement protocols to ensure fair application of media laws.
- Strengthen legal penalties for non-compliance, ensuring accountability.

**1.10 Training and Career Development**

Training and career development are essential components for strengthening the institutional capacity of the IMC. As the media landscape evolves rapidly with the rise of digital platforms, new technologies, and changing regulatory standards, it is vital for IMC staff to stay updated with modern skills and best practices in media regulation, monitoring, enforcement, and public engagement.

**Findings**

- There is no structured or continuous professional development plan in place to ensure that staff remain up-to-date with emerging trends in media regulation, digital technologies, and global best practices.
- Limited access to specialized training, both locally and internationally, has left many staff without the advanced skills required to manage modern regulatory challenges, including digital content monitoring, media ethics enforcement, conflict-sensitive reporting, and the use of regulatory technology tools.
- The absence of a clear career development pathway also affects staff motivation, retention, and succession planning within the Commission.

## Recommendations

- ***Develop a Structured Training and Career Development Policy:***

The IMC should establish a comprehensive training and development framework that outlines short, medium, and long-term learning priorities for all staff, aligned with its strategic goals.

- ***Facilitate Regular Capacity-Building Workshops:***

Organize both in-house and external training sessions focused on media regulation, ethics, legal interpretation, digital monitoring tools, conflict-sensitive journalism, and administrative effectiveness.

- ***Promote International Exposure and Exchange Programs:***

Facilitate opportunities for IMC staff to participate in regional and international conferences, study tours, and peer-learning exchanges to build global perspectives and adopt best practices.

- ***Establish Career Progression Pathways:***

Define clear roles, promotion criteria, and professional growth opportunities to motivate staff and encourage long-term commitment to the Commission.

- ***Leverage Partnerships for Training Support:***

Collaborate with Development Partners, universities, media associations, and international regulatory bodies to access funding and technical assistance for specialized training.

### 1.11 Regional Office Coverage

#### Findings:

The Independent Media Commission (IMC) currently maintains operational offices in four regions, including its headquarters in Freetown. However, there is a notable absence of an office in the North-West Region, despite the Commission's responsibility to monitor and regulate media activities nationwide. This gap in physical presence has limited the IMC's ability to effectively oversee media operations, respond to complaints, and engage stakeholders within the North-West Region. The lack of a dedicated regional office also hampers timely monitoring and reduces the visibility of the Commission's regulatory authority in that area.

Furthermore, the review noted that the regional offices operate with constrained budgets, leading to inadequate staffing, insufficient training opportunities, and limited operational capacity. This hampers their ability to effectively monitor and support local media.

#### Recommendation:

- It is recommended that the Commission establish a fully equipped regional office in the North-West Region to strengthen its nationwide operational presence. This will enhance media oversight, improve response time to

complaints, and ensure consistent stakeholder engagement across all regions. The establishment of this office should be prioritized in future budget allocations and supported with the necessary human, logistical, and ICT resources.

- Increase Funding and Resources: The review **recommends** that the government and donor agencies should consider increasing funding for regional offices to enhance their operational capacity. This includes hiring more staff, providing necessary equipment, and ensuring that offices are adequately equipped to carry out their functions.

### 1.12 Staffing

The effectiveness of the Commission is significantly influenced by the qualifications, experience, and diversity of its staffing. Below is a detailed overview of the staffing structure, highlighting the qualifications, professional backgrounds, and age demographics of the commission's personnel.

### 1.13 Staff Strength

Based on the Staff List provided to the Review Team, the total workforce, encompassing employees at both headquarters and regional offices, amounts to thirty-three (33) personnel. Of this total, nine are professional/Technical staff, while fourteen are Administrative staff, and ten are support staff. It is also worth noting that out of the total number of staff of the Commission, thirteen are posted in the regions. The job categories are outlined in the table below.

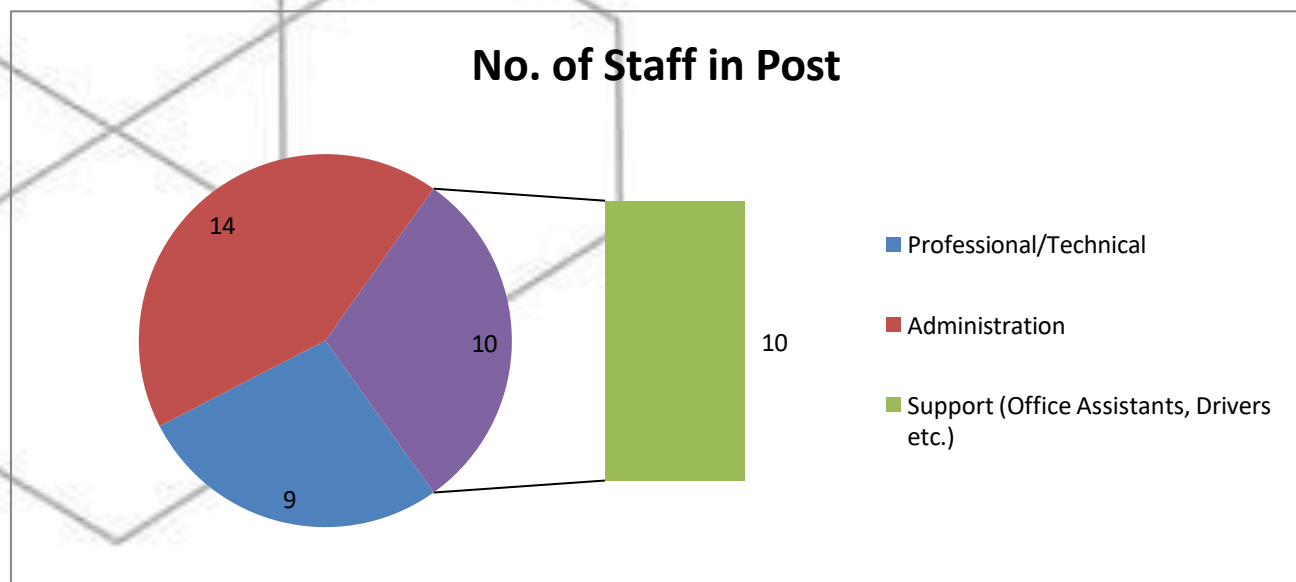
**Table 1: Analysis of Job Category**

Job Category	No. of Staff in Post
Professional/Technical	9
Administration	14
Support (Office Assistants, Drivers etc.)	10
Total Staff Strength	33

Source: IMC Staff List 2025

In the table above, the Professional/Technical staffs includes Regional Managers, Monitoring Research and Projects officers. Meanwhile, the Administration consists of the Executive Secretary, Finance Director, Human Resource Manager, Library and Records Manager, Senior Information Technology Officer, Senior Administrative Officer, Administrative officer and Accountant. Support Staff includes Office Assistants, Securities and Drivers. A graphical representation of the job categories is shown in figure 2 below.

**Table 2: Distribution of Staff According to Job Category**

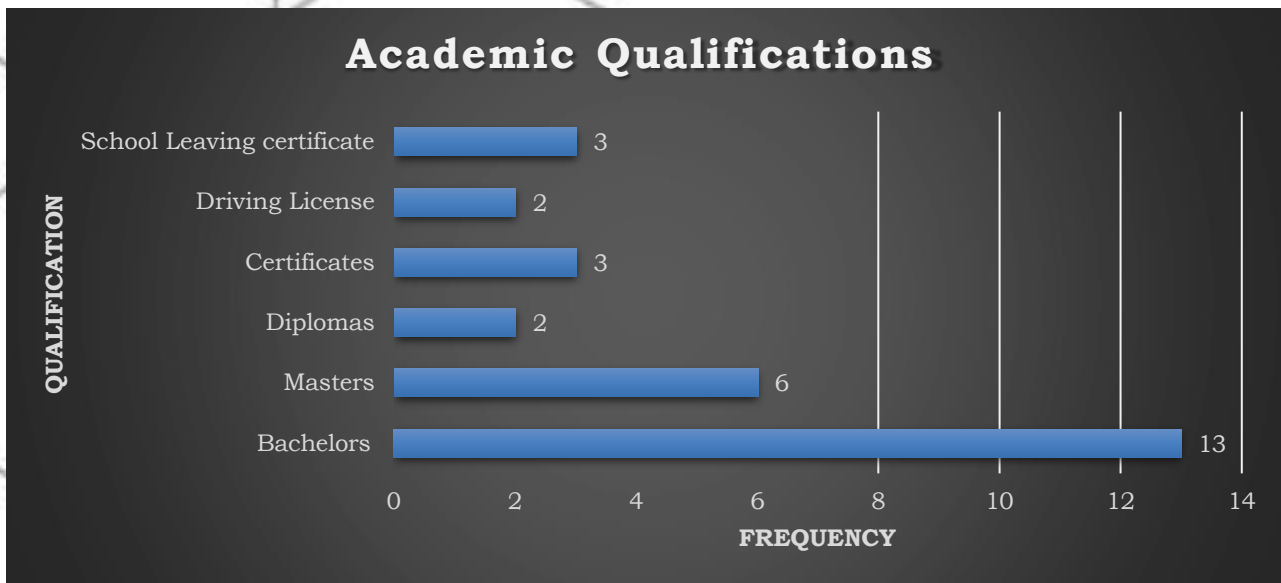


Source: IMC Staff List 2025

**Table 3: Classification of Degrees/certificates**

<b>Masters</b>	<b>Bachelors</b>	<b>Diplomas</b>	<b>Certificates</b>	<b>Driving License</b>	<b>School Leaving certificate</b>
6	13	2	3	2	3

**Figure 8: Staff Qualification**



Source: IMC staff list, 2025

The graph above indicates that of the total number of 33 current staff, only 29 have qualifications ranging from Certificates/Diplomas to Master's degrees.

In summary:

Six (6) staff representing 18.2% are master's degree holders.

Thirteen (13) staff representing 39.4% are bachelor's degree holders.

Ten (10) staff are diploma and certificate holders, representing 30.3% in various fields of study.

The data also indicate that 4 staff (12.1%) of the total 33 did not submit their qualifications to the review team for analysis, which should be a great concern for the Commission.

Based on the analysis above, the review noted that the institutional capacity of the Commission is weak to ensure efficient and effective service delivery. Consequently, this justified the need to embark on institutional capacity building to further develop the specific knowledge and skills needed by the staff of the Commission, to take adequate measures to prevent and manage the media landscape in Sierra Leone.

## Recommendations

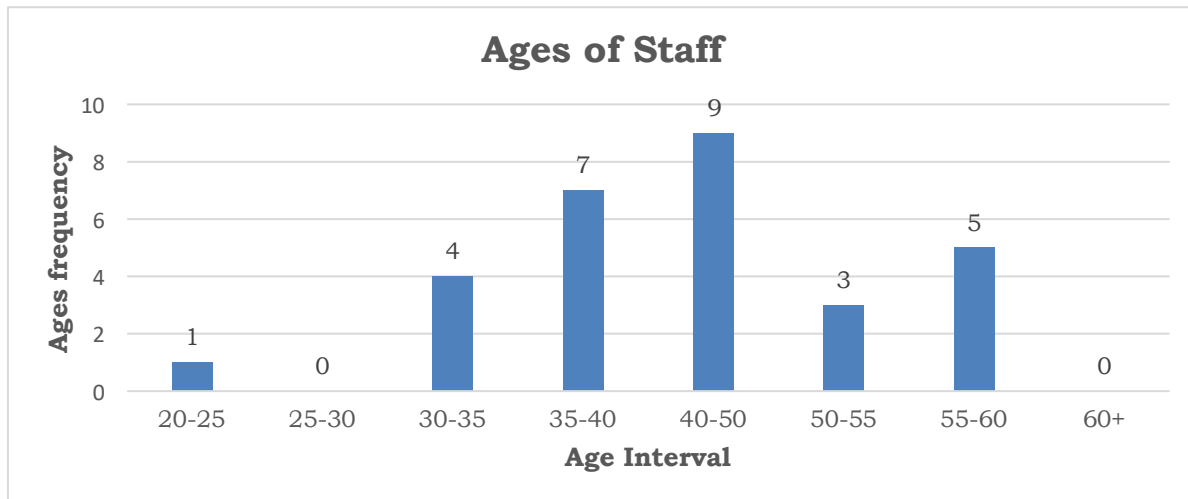
We recommend continuous professional development (CPD) tailored to enhance the skills of employees based on their qualifications and current industry standards. This could include workshops, online courses, or conferences.

We further recommend that the Commission implement a mentorship initiative where experienced staff members mentor younger employees. This can facilitate knowledge transfer and promote a collaborative work environment.

**Table 4: Staff Age Profile**

AGE	FREQUENCY
20-25	1
25-30	0
30-35	4
35-40	7
40-50	9
50-55	3
55-60	5
60+	0

*Figure 9: Ages of Staff*



Source: IMC Staff list, 2025

In summary:

- Five (5) staff are within the age bracket 55-60, representing 15.2% of the workforce that is very close to retirement.
- Three (3) staff, indicating 9.1% of the workforce, are within the age bracket of 50-55
- Nine (9) staff are within the age bracket of 40-50, representing 27.3% of the workforce.
- Seven (7) staff are within the age bracket 35-40, representing 21.2% of the workforce.
- Four (4) staff are within the age brackets 30-35, representing 12.1% of the workforce.
- One (1) staff member is within the age bracket 20-25, representing 3.0% of the workforce
- Data indicate that 4 staff (12.1%) of the total staff strength of 33 did not indicate their date of birth on the staff list submitted to the review team.

Also, data indicate that 5 staff (15.2%) of the total staff strength of 33 are within the age bracket of 55-60, implying that they are very close to retirement.

The analysis also indicates that the Commission, like many other institutions, lacks succession planning and the opportunity for skills transfer.

## **Recommendation**

### **Succession Planning**

Based on the analysis of the age profile, 5 staff (15.2 percent) are to be retired in the next five years. We therefore recommend that the Commission develop a succession plan to mitigate the risk of losing key competencies, especially from senior staff approaching retirement.

## Names of Stakeholder Interviewed

No	CATEGORY	NAMES	DESIGNATION	CONTACT
<b>1 Head office</b>				
1		Joseph Egbenda Kapowa	Chairman	
2		Khalil Kallon	Executive Secretary	
		Ibrahim Sillah	Finance Director	
3		Mariama B. Caulker	Human Resource Manager	
4		Fatmata Kamara	Library and Records Manager	
5		Joseph Mannah Brima	Monitoring, Research and Project Manager	
6		Mariama B. Caulker	Human Resource Manager	
7		Fatmata Kamara	Library and Records Manager	
		Muriel John	Regional Media Monitor N/W	
8		Baimba Sesay	Accountant	
9		Regina Taylor	Senior Administrative Secretary	
10		Mahmoud R. Kamara	Monitoring Research and Project Officer	
11		Malcolm W. Decker	Senior Information Technology Officer,	
12		Francess Esther Cummings Sesay	Administrative Officer	
13		Bailor A. S Kamara	Monitoring, Research and Project Officer,	
14		Hawa Kalokoh	Administrative Secretary	
15		Alusine L. Bangura	Procurement	
16		Idrissa Turay	Records and Projects	
17		Francis Harding	Senior Driver,	
18		Mohamed Alieu Bah	Driver	
19		Francis Komeh	Office Assistant	
20		Babatunde Coker	Dispatch Officer	
<b>2 Makeni Office</b>				
1.		Karifala Samura	Regional Manager	088992789
2.		Ferenkeh Marrah	Administrative Secretary,	
3.		Sahid Kamara	Security Officer	
4.		Moses Thullah	Office Assistant	
<b>3 BO Office</b>				
1.		Sheku Mansaray	Regional Manager	076 533178
2.		Musa Koroma	Monitoring, Research and Project Officer	
3		Sukainatu Walters	Administrative Secretary	
4		Mohamed Sillah	Security officer	
<b>4 Kenema Office</b>				
1		Steven B. Mansaray	Regional Manager	076516079
2		Jabati Jaward	Monitoring, Research and Project Officer,	
3		Mary Jatta Musa	Administrative Secretary	
4		Yayah Ghandi	Office Assistant	

## MFR Questionnaire

### Senior Management Officers

The purpose of this questionnaire is to determine the nature of the overall strategy and structure of the MDA to enable the MFR team to identify key issues and determine the approach to further research and interview. Please complete the questions as thoroughly as possible. A member of the Review Team will be available to answer questions and assist as necessary. Please use additional paper to provide answers if necessary.

**NAME OF MDA:**.....

**NAME OF POST HOLDER:** .....

**DEPT/ UNIT:** .....

**JOB TITLE:**.....

**LOCATION:**.....

**DATE:** .....

**TEL (MOB/LAND):** .....

**EMAIL**.....

Please answer the following questions as comprehensively as possible. If there is insufficient space to answer fully any question, please record your name and relevant additional comments on the last page or on a separate sheet of paper and attach it with your name and number.

#### **SECTION A: MANDATE, MISSION AND VISION**

1. How is your mandate helping to address the current and foreseeable challenges with respect to service delivery?

.....  
.....

2. To what extent is your mandate in line with the development priorities of the GoSL?

.....  
.....

3. What are the issues and concerns that requires urgent attention with respect to your mandate?

.....  
.....

**SECTION B: FUNCTIONS**

4. Please list the main functions of the department, division or unit within the MDA for which you are responsible. (Add additional sheets if necessary).

\_\_\_\_\_

a. \_\_\_\_\_  
b. \_\_\_\_\_  
c. \_\_\_\_\_  
d. \_\_\_\_\_  
e. \_\_\_\_\_  
f. \_\_\_\_\_

5. How is the annual work plan developed and monitored? (Please use additional sheets if necessary)

.....  
.....

6. Please state any operational problem(s) encountered in carrying out the functions of your department, division or unit within the MDA.

.....  
.....

7. How could procedures, processes and systems be improved upon to address these problems and improve performance and service delivery?

.....  
.....

**SECTION C: COORDINATION AND INTERNAL RELATIONS**

8. Which other departments/divisions/units within the MDA you collaborate with in the performance of your functions?

.....  
.....

9. What is/are the difficulties (if any) do you experience (including overlaps or duplications of effort).

.....  
.....

10. What can be done to improve areas of collaboration with other departments/divisions/agencies/units:

.....  
.....

11. Do you/or your department/agency have regional offices? Yes /No  
If yes, please indicate?

.....  
.....

12. Please explain your recruitment process.

.....  
.....

13. What are the general human resource issues or problems your dept/unit is experiencing? (staff strength, retention, turnover, capacity etc).

.....  
.....

14. Do you have grievance reporting Mechanism? If yes/no, please explain.....

.....  
.....

**Staff Training, Promotion and Career Development**

15. What mechanism do you have in place for promotions and career development?

.....  
.....

16. Do you have a training and capacity building policy? If yes; please briefly state what the policy says about staff training and capacity development,

.....  
.....

17. How do you identify employee training and development needs?

.....  
.....

18. Please provide a list of training(s) you or staff within your dept/unit or the institution in the past 3 years

.....  
.....

19. How do you appraise the performance of staff?

.....  
.....

20. How many people have gone on retirement since the past twelve months? (Aggregate by gender)

.....  
.....

21. How many people have been recently promoted in line with your career development plan?

.....  
.....

**Records Management**

22. What system do you have in place for Records' Management?

.....  
.....

23. How is this system helping to ensure institutional productivity?

.....  
.....

24. What other challenges are you experiencing with respect to Records Management?

.....  
.....

25. What do you think should be done to ensure an effective Records Management system contributes to institutional productivity and service delivery?

.....

.....

**SECTION F: ICT, AND STAKEHOLDER/CITIZEN ENGAGEMENT**

26. Current IT Equipment Capacity in your unit/dept

Essential Equipment		Current Condition				
Type	Available	Good	Needs Repair	Obsolete	Not Available	Number Needed

27. What IT facilities do you need to ensure operational efficiency?

.....

.....

28. Please provide a justification for additional IT facilities?

.....

.....

29. Do you have an effective communication strategy? If yes, please provide...

.....

.....

30. Do you perform oversight functions to other Agencies? If yes, explain...

.....

.....

31. Please provide the list of the Agencies under your supervision.....

.....

.....

32. How can communication be improved upon to enhance service delivery?

a. Internally

\_\_\_\_\_

\_\_\_\_\_

b. With other MDAs

---

---

c. With your key clients/ primary beneficiaries

---

---

d. With the general public?

---

---

33. How does the public communicate their interest and/or concerns to your MDA?

.....

.....

34. Please state any challenges in your interaction with any of your stakeholders/  
partners/clients/general public.

.....

.....

35. How can communication be improved upon to enhance service delivery?

e. Internally

---

---

f. With other MDAs

---

---

g. With your key clients/ primary beneficiaries

---

---

h. With the general public

---

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**SECTION G: FINANCE, BUDGETING AND PROCUREMENT**

36. Please state any sources of revenue generation by your unit/dept

.....  
.....

37. Do you set annual revenue target? Yes/no (if yes, please state).

.....  
.....

38. If yes, how much have you been able to generate for the past three (3) years?

.....  
.....

39. How do you normally account for the revenue generated?

.....  
.....

40. Is your Agency/Commission part of the Annual Budgetary process organized by the Ministry of Finance? Yes/no

.....  
.....

41. If no, explain the budget formulation process including any challenges your unit/dept has experienced in the past.

.....  
.....

42. Explain the processes used for procuring goods, equipment, and services in your unit/dept

.....  
.....

**SECTION H: ACCOMMODATION AND OFFICE SPACE**

43. How spacious is the Office?

.....  
.....

44. How many officers to an office?

.....  
.....

45. What other general issues and challenges with respect to accommodation do you have?

.....  
.....

**PLEASE PROVIDE ANY ADDITIONAL INFORMATION THAT COULD HELP THE REVIEW TEAM TO UNDERSTAND YOUR MANAGEMENT AND OPERATIONAL FUNCTIONS**

**Thank you very much for your cooperation**

## Junior Management Officers

The purpose of this questionnaire is to determine the nature of the overall strategy and structure of the MDA to enable the MFR team to identify key issues and determine the approach to further research and interview. Please complete questions as thoroughly as possible. A member of the Review Team will be available to answer questions and assist as necessary. Please use additional paper to provide answers if necessary.

**NAME OF MDA:**.....

**NAME OF POST HOLDER:** .....

**DEPT/UNIT:** .....

**JOB TITLE:**.....

**LOCATION:**.....

**DATE:** .....

**TEL (MOB/LAND):** .....

**EMAIL**.....

Please answer the following questions as comprehensively as possible. If there is insufficient space to answer fully any question, please record your name and relevant additional comments on the last page or on a separate sheet of paper and attach it with you name and number.

### **SECTION A: FUNCTIONS**

46. Please state your job description/job roles and responsibilities.

.....  
.....

47. Please state any operational problem(s) you often encounter in carrying out the functions of your department, division or unit within the MDA.

.....  
.....

48. How could procedures, processes and systems be improved upon to address these problems and improve performance and service delivery?

.....  
.....

**SECTION B: COORDINATION AND INTERNAL RELATIONS**

49. What is/are the difficulties (if any) do you experience (including overlaps or duplications of effort) with other division or units within the MDA.

.....  
.....

50. What can be done to improve areas of collaboration with other departments/ divisions/agencies/units:

.....  
.....

**SECTION C: ORGANISATION/ OPERATIONAL STRUCTURE**

51. In terms of supervision, who do you report to?

.....  
.....

52. Who report to you? If there is any?

.....  
.....

**SECTION D: STAFF PROMOTION AND CAREER DEVELOPMENT**

53. What are the opportunities offered to you in the past three years?

.....  
.....

54. How many trainings have you undergone in the last three years?

.....  
.....

55. How were your capacity development needs identified?

.....  
.....

56. How was your performance over the year/years appraised?

.....  
.....

57. How many years have you spent in your current position?

.....  
.....

58. Have you had any promotion since the past five-ten years? If no, please explain...

.....  
.....

59. Have you benefited from any grievance reporting mechanism? If yes/no, please explain.....

.....  
.....

**SECTION E: RECORDS MANAGEMENT**

60. What system do you have in place for Records' Management?

.....  
.....

61. How is this system helping/enhancing your productivity?

.....  
.....

62. What other challenges are you experiencing with respect to Records Management?

.....  
.....

63. What do you think should be done to ensure effective Records' Management System contribute to institutional productivity and service delivery?

.....  
.....

**SECTION F: ICT**

64. What IT facilities do you need to perform effectively?

.....

65. How effective is your internet connectivity?

**SECTION H: ACCOMMODATION AND OFFICE SPACE**

66. How spacious is your Office?

.....  
.....

67. How many of you to an office?

.....  
.....

68. What other general issues and challenges with respect to accommodation do you have?

.....  
.....

**PLEASE PROVIDE ANY ADDITIONAL INFORMATION THAT COULD HELP THE REVIEW TEAM TO UNDERSTAND YOUR MANAGEMENT AND OPERATIONAL FUNCTIONS**

**Thank you very much for your cooperation**

## Annex

### Technical Team that Developed the Report

No.	Name	Designation	Institution
1	Suliaman Phoray-Musa	Director	PSRU
2	Albert R.C.E Williams	Chief of Programmes	PSRU
3	Lamin Tarawally	Head Policy, Research, Monitoring and Evaluation	PSRU
4	Cecilia Turay	Senior Communications Analyst	PSRU
5	Elogima Kokofele	Senior Monitoring and Evaluation Analyst	PSRU
6	Ibrahim Kamara	Senior Institutional Reform Analyst	PSRU