



Republic of Zambia

THE NATIONAL POLICY ON ANTI-CORRUPTION

DECEMBER 2023



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FOREWORD



Corruption is a scourge that has continued to grow over the years in Zambia. It robs the nation of resources needed to deliver essential services to the people and develop the country. To provide a framework for preventing and combating corruption in a comprehensive, coordinated and inclusive manner, Government, in 2009, developed the first National Anti-Corruption Policy (NACP). During the implementation of the Policy, various legal and institutional reforms were undertaken. Corruption, however, continues to be a pervasive problem in Zambia. Left unchecked, corruption has a serious negative impact on the rule of law,

national security and the quality of life, particularly for the poor and vulnerable groups.

Government has, therefore, laid down a clear agenda for an inclusive fight against corruption and is fully committed to the principle of “Zero Tolerance to Corruption”, in all its forms. Government’s anti-corruption agenda focuses on effective prevention of corruption by sealing opportunities for corruption, increasing transparency, accountability and oversight in the conduct of public affairs. This Policy builds on the 2009 NACP. It aims to enhance transparency, accountability and control of corruption prone areas in the public and private sector.

This Policy aims to strengthen institutional capacities, co-ordination and collaboration among law enforcement agencies, private sector and the civil society. Support to the Law Enforcement Agencies, the Judicature and Oversight Institutions will be cardinal to enable them efficiently and effectively curb corruption and other related crimes. The Policy also recognises the critical role of courts in anti-corruption by supporting the Judiciary to efficiently preside over corruption, financial and economic related matters. It also takes into account areas relating to: unexplained wealth; recovery of stolen assets, beneficial ownership; lifestyle audits, declaration of assets and liabilities as well as corporate governance.

Further, through this Policy, the country will continue to uphold its commitments and obligations to fighting corruption at both regional and international levels by ensuring that the country’s anti-corruption initiatives meet international standards and best practices.



Finally, the Policy takes an inclusive and participative approach to fighting corruption to ensure that we cut the chain of corruption as a nation and achieve "*Zero tolerance to Corruption*", in all its forms, past, present and future. I, therefore, call upon all Zambians and our partners to join hands with Government in preventing and combating corruption.

A handwritten signature in red ink, consisting of several overlapping loops and strokes, is positioned above the name.

Hakainde Hichilema

PRESIDENT OF THE REPUBLIC OF ZAMBIA



STATEMENT BY THE MINISTER OF JUSTICE



On 10th September, 2021, the President of the Republic of Zambia, Mr. Hakainde Hichilema, in his Speech during the official opening of the first Session of the 13th National Assembly called upon all Zambians to wage a war against corruption. Consequently, Cabinet directed the Ministry of Justice to initiate a review of the national policy framework on preventing and combating corruption to ensure resources benefit all citizens through integrity, enhanced transparency and accountability at all levels of society.

This Policy is a culmination of that directive and will address the detrimental impact corruption has on the country and its citizens. The Policy will provide a framework to facilitate effective and encompassing implementation of anti-corruption measures rooted in the rule of law.

It is Government's position that the Policy will galvanise society to join hands in building a better Zambia that has no tolerance to corruption in all its forms. Government has taken an all-embracing approach. Corruption should be a serious concern to all of us. We have seen how it robs society of the much needed resources necessary for delivery of basic services; it deepens poverty, perpetuates youth unemployment, weakens governance institutions and puts citizens' lives at greater risk. In line with the United Nations Convention Against Corruption, the Policy has measures that bring on board civil society, media and private sector, especially financial institutions as a way of creating an ethical and accountable country, business and society with integrity and respect for the rule of law. Recognising how women and youths are disproportionately impacted by corruption, the policy has endeavoured to promote empowerment of such groups through social accountability tools and platforms.

The Policy is also linked to key national governance guiding frameworks such as the Republican Constitution, Vision 2030 and the Eighth National Development Plan. Let us fight corruption in all its forms, for a better Zambia and economic transformation for all of us!

Mulambo Haimbe, SC, MP

MINISTER OF JUSTICE

ACKNOWLEDGMENTS



The preparation of the 2022 National Policy on Anti-Corruption involved wide consultations with key stakeholders. This was in an endeavour to have a framework that is responsive to the needs and aspirations of the nation. This



participatory process entrenches the need for rooted synergies, critical to effectively fight corruption. The Technical Working Group tasked to lead this process, undertook a national stakeholders' consultation, which was preceded by provincial consultations held in two (2) districts of all the ten (10) provinces. The formulation of the Policy was also informed by various reviews of the performance of the 2009 National Anti-Corruption Policy, legal and societal developments, international context fit practices and instruments.

We would like to acknowledge the logistical and technical support provided by our partners, particularly, the Team from the International Monetary Fund (IMF), Washington DC. Special appreciation goes to the German Agency for International Cooperation (GIZ) for the financial support rendered towards the development of this Policy.

Special recognition also goes to the Technical Working Group, comprising the following institutions: Ministry of Justice, Cabinet Office, Anti-Corruption Commission, Judiciary, Office of the Auditor General, Zambia Police Service, National Prosecution Authority, Drug Enforcement Commission, Financial Intelligence Centre, Zambia Public Procurement Authority, Office of the Public Protector, Transparency International Zambia, Zambia Council for Social Development, and the Centre for Ethics and Public Integrity. We further recognise various Ministries, the Private Sector, Civil Society Organisations and Researchers, including all stakeholders who made submissions during the consultative and validation process.



We have no doubt this Policy will facilitate effective coordination of various national stakeholders' efforts in preventing and combating corruption for the benefit of the Zambian people.

A handwritten signature in purple ink, appearing to read "Daka", is located above the name of the Permanent Secretary.

Thandiwe Daka Oteng

PERMANENT SECRETARY (A)

MINISTRY OF JUSTICE

A handwritten signature in black ink, appearing to read "TMS", is located above the name of the Director General.

Thom Trevor Shamakamba

DIRECTOR GENERAL

ANTI-CORRUPTION COMMISSION



WORKING DEFINITIONS

For purposes of this Policy, the following words and concepts have been defined as follows:

Accountability	The obligation of an individual or an organisation (either in the public or the private sectors) to accept responsibility for their actions, and to disclose them in a transparent manner and being answerable to stakeholders such as citizens. This includes the responsibility for decision-making processes, money or other entrusted property.
Beneficial Ownership	Having direct or indirect, ownership, control, exercise of substantial interest in, or receiving substantial economic benefit from a corporation through various means
Bribery	Promising, soliciting, rewarding, giving, receiving or offering a financial or other advantage to another person to induce that person to perform improperly or illegally a relevant function or activity in an official or legal duty.
Bribe	Gift of money, favour or material given to persuade someone to do or not to do something.
Corruption	Soliciting, accepting, obtaining, giving, promising or offering of gratification by way of a bribe or other personal temptation or inducement or the misuse or abuse of a public office or authority for private advantage or benefit for oneself or another person.
Civil Society	A group of persons or organisation who are not part of the Government, who associate for the purpose of advancing or protecting particular interests.
Early Childhood Education	Education provided to young children of 3-6 years which prepares them for formal schooling.



e-Government	The use of information and communication technologies with the aim of improving information and service delivery, encouraging citizen participation in the decision-making process and making government more accountable, transparent and effective.
Economic Crime	Illegal acts committed by an individual or a group of individuals to obtain a financial or professional advantage. The principal motive in such crimes is economic gain.
Financial Crime	A spectrum of illicit activities that involve fraudulent or dishonest behaviour, including illegal conversion of property ownership for the purposes of personal financial gain.
Electoral Corruption	The giving or offering of gratification by way of a bribe or other personal temptation or inducement or the misuse or abuse of existing electoral laws and regulations to gain political advantage.
Good Governance	A governance process that is participatory, consensus oriented, accountable, transparent, responsive, effective and efficient, equitable and inclusive and follows the rule of law.
Integrity Committee	An internal institutional administrative structure meant to institutionalise the prevention of corruption and related malpractices.
Non-State Actor	An individual or entity that is not part of the public sector.
Oversight Institution	A government agency or body that is charged with the responsibility of overseeing or regulating the operations of government entities through supervision, monitoring, evaluation and review of performance as a means of ensuring compliance with relevant laws, regulations and policies.
Private Sector	A country's economic system that is run by individuals and non-state entities.



Procuring Entity	A Government Agency or parastatal body carrying out procurement using public funds or any other funds; or Any other body or unit established or mandated by Government to carry out procurement using public funds;
Public Office	An office whose emoluments and expenses are a charge on the Consolidated Fund or other prescribed public fund and includes a State office, Constitutional office and an office in the public service, including that of a member of a commission.
Public Procurement	The acquisition of goods, construction works or services by a Procuring Entity.
Public Officer	A person holding or acting in a public office but does not include a state officer, councillor, a constitutional office holder, a judge and a judicial officer.
Service Charter	A public document that sets out basic information on the services provided by an organisation, the standards of service that the public or customers can expect from an institution, including feedback and grievance mechanisms.
Sextortion	The abuse of power to obtain sexual benefit or advantage.
State Actor	An individual or entity that is part of the public sector.
State Capture	A type of systemic political corruption in which private interests significantly influence a state's decision-making processes to their own advantage.
State Office	Includes the Office of President, Vice-President, Speaker, Deputy Speaker, Member of Parliament, Minister and Provincial Minister.
State Officer	A person holding or acting in a State office.



Systemic Corruption	Also known as endemic corruption, is a situation when corruption is an integral part of a state's economic, social and political system, and where most people have no alternatives to dealing with corrupt officials.
Transparency	The quality of being open, communicative and accountable.



ACRONYMS

8NDP	Eighth National Development Plan
ACC	Anti-Corruption Commission
AU	African Union
CPI	Corruption Perception Index
CSO	Civil Society Organisation
DEC	Drug Enforcement Commission
DPP	Director of Public Prosecutions
ECZ	Electoral Commission of Zambia
EITI	Extractive Industries Transparency Initiative
FIC	Financial Intelligence Centre
FBO	Faith Based Organisations
IC	Integrity Committees
ICT	Information Communication and Technology
IEC	Information Education and Communication
LEA	Law Enforcement Agencies
MPSA	Ministries, Provinces and Spending Agencies
NACP	National Anti-Corruption Policy
NPA	National Prosecutions Authority
OAG	Office of the Auditor General
OPP	Office of the Public Protector
PPCC	Police Public Complaints Commission
SADC	Southern African Development Community
SITET	Special Investigations Team on Economy and Trade



STR'S	Suspicious Transaction Reports
TI-Z	Transparency International Zambia
UNCAC	United Nations Convention Against Corruption
ZBPI	Zambia Bribe Payers Index
ZLDC	Zambia Law Development Commission
ZPPA	Zambia Public Procurement Authority
ZRA	Zambia Revenue Authority



1 INTRODUCTION

Corruption is one of the largest impediments to economic growth and human development. It undermines the rule of law, national security, democracy, public trust in state institutions and investor confidence in the country. Corruption manifests in all spheres of society and is particularly harmful to the poor and vulnerable groups in society.

Over the years, the Government of the Republic of Zambia has been putting in place measures to address corruption. In 2009, Government launched its first National Anti-Corruption Policy (NACP) to provide a framework for a corrupt-free society in a comprehensive, coordinated, inclusive and sustainable manner in both public and private institutions. The Policy addressed social, institutional and legal factors that affect the fight against corruption. Implementation of the Policy contributed to strengthening of the institutional and legal frameworks for combating corruption.

The fight against corruption in Zambia has not been without challenges. The 2015 Report for the Evaluation of the National Anti- Corruption Policy, highlighted weaknesses at social, institutional and legal levels that need to be addressed. This is also reflected in various country reports from expert bodies like the *U4 Anti-Corruption Resource Centre* that point to inadequate supportive legal and institutional frameworks, weak law enforcement, cumbersome bureaucratic procedures and loss of public support infighting corruption. Further, consecutive surveys of the Zambia Bribe Payers Index (ZBPI) indicate prevalence and experience of bribery at points of service delivery such as issuance of national documents, licenses, tax administration and acquisition of land. These shortcomings and other emerging issues like public procurement during the implementation of the 2009 Policy have prompted the revision of the NACP.

The Policy is divided into five sections. Section One introduces the purpose of the Policy. Section Two presents an analysis of the current situation regarding the fight against corruption in Zambia, including the causes and effects of corruption on the country. Section Three outlines the Vision, Rationale and Guiding Principles for the Policy, while Section Four presents the Policy Objectives and Measures. The last Section is the Implementation Framework which outlines the Institutional Arrangements, Legal Framework, Resource Mobilisation and the Monitoring and Evaluation Framework, to support the implementation of the Policy. An Implementation Plan has also been developed for the Policy.



2 SITUATION ANALYSIS

2.1 BACKGROUND

Corruption remains a national and international developmental challenge and one that requires concerted efforts from governments, private sector, the media, civil society and the general public to address the scourge. Initial efforts to combat and prevent corruption in Zambia were based on the Penal Code Cap 146 of the Laws of Zambia and the 1972 Leadership Code of Conduct for Public Workers. The Leadership Code set limits on the sources of income or size of private business and the extent of land that could be owned by 'leaders' (party members, all public offices, parastatals, educational institutions, spouses and children, among others). It also provided for declaration of assets and liabilities by leaders. In 1971, Government established the Special Investigations Team on Economy and Trade (SITET) to investigate corruption and economic crimes. The Leadership Code and SITET succeeded in restricting public officers from abusing their authority or indeed engaging in corrupt practices, save for their invasive application and over-cue nature in relation to liberties, especially economic rights.

Since 1980, the fight against corruption has been anchored on the following laws: the Constitution, Corrupt Practices Act No. 14 of 1980, Anti-Corruption Commission Act No. 42 of 1996, Anti-Corruption Commission Act No. 38 of 2010 and the Anti-Corruption Act. No. 3 of 2012. In addition, Government has implemented anti-corruption reforms in successive national development plans under the Good Governance Programme.

In 2009, Zambia developed the first National Anti-Corruption Policy (NACP) to coordinate, harmonise and incorporate all stakeholders in the fight against corruption. The Policy led to enhanced legislation through the enactment of laws such as the Forfeiture of Proceeds of Crime Act No. 19 of 2010 and the Public Interest Disclosure (Protection of Whistle-blowers) Act No. 4 of 2010. Government also enacted the Prohibition and Prevention of Money Laundering (Amendment) Act No. 44 of 2010 and Companies Act No. 10 of 2017.

The country also amended the Republican Constitution in 2016 which led to the consequential enactment of the Public Finance Management Act No.1 of 2018 and the Public Procurement Act No. 8 of 2020, among others. Zambia's legal framework for fighting corruption also encompasses international instruments and mechanisms. They include the United Nations Convention against Corruption (UNCAC), the African Union Convention on Preventing and Combating Corruption (AUCPCC), the Southern African Development Community Protocol against Corruption (SADC-PAC), the United Nations



Convention against Transnational Organised Crime (UNTOC) and the African Peer Review Mechanism (APRM).

The prevalence of corruption in the country, however, continues to be high. The Corruption Perception Index (CPI) shows that Zambia moved from a score of 38% in 2016 to 33% for 2021 and 2022. The trend is also mirrored in the Zambia Bribe Payers' Index (ZBPI) which shows a recurrent annual increase in the likelihood of citizens experiencing bribe seeking behaviour, when accessing public services such as health, permits, licences, official identity documents and police. Further, the fight against corruption has mainly been left to the Anti-Corruption Commission (ACC) and other Law Enforcement Agencies (LEAs), instead of having a multi-sectoral approach.

2.1.1 The Socio-economic Impact of Corruption

Systemic corruption has negatively affected the socio-economic development of the country. According to the 2020 World Bank estimates, developing countries have lost about US\$400 billion in proceeds of corruption in the last ten years. This has contributed to the weakening of the provision of critical public services such as health and education. According to the Financial Intelligence Centre (FIC), money laundering and suspicious transactions reports stood at 2,577, for 2021. This represented an increase of 13.7% compared to the year 2020. The value of these suspicious transactions and money laundering was ZMW 6,533 million representing an increase of 6% compared to the 2020 (ZMW 6,160 million). These transactions, among others, involved the usage of gatekeepers such as law, accounting and audit firms as well as banks to launder suspected proceeds of crime.

2.2 CORRUPTION PREVENTION

To prevent corruption in Zambia, Government has put in place various measures to eliminate the opportunities for corrupt practices. In 2009, the National Anti-Corruption Policy was launched to effectively coordinate and scale up the fight against corruption. This has seen the mainstreaming of corruption prevention in the routine business of both public and private institutions through the establishment of Integrity Committees, including the launch of the Public Service Code of Ethics aimed at promoting ethical conduct in the public service. Further, Government has mandated all public institutions to develop Service Charters to enhance efficiency, transparency and accountability in Public Service delivery.

Despite the aforementioned efforts, indices such as the CPI and the ZBPI have continued to show that the levels of corruption have been on the rise.



2.2.1 Public Education and Awareness

To influence behavioural and attitude change through promotion of integrity and ethical conduct in young people, Government has produced and distributed various information, education and communication (IEC) materials on corruption and accountability. In 2012, Government revised the primary and secondary school curricula to include anti-corruption content. In addition, one hundred and fifty (150) teachers have been trained under a capacity building programme on anti-corruption teaching content. The Anti-Corruption Commission, among others, has facilitated the formation of one hundred and ten (110) Anti-corruption clubs in both primary and secondary institutions of learning. Primary and Secondary schools also participate in various good governance and anti-corruption activities such as debates, workshops and essay writing competitions. However, there have not been, similar interventions at early childhood and tertiary education levels. Further, children and young people outside the formal education system are yet to be reached.

Certain cultural practices and traditions such as paying homage to elders or leaders contribute to corruption in Zambia. To counter this negative effect, Government has been implementing activities on public education, civic awareness and campaigns on corruption to the general public. Public sensitisation programmes are also conducted through the print and electronic media as well as community outreach programmes.

Despite high levels of awareness on corruption among the public, as indicated in the 2020 Afrobarometer Survey Round 8, there is still limited community participation in anti-corruption activities. In the same survey, 79.4% of households felt they risked retaliation if they reported corruption. Limited geographical coverage, insufficient collaboration on anti-corruption and accountability activities as well as low number of organisations involved in anti-corruption and social accountability also augmented the challenges. Further, the adopted methods and content might not have been audience appropriate to respond to communities' effective ways of combating and eradicating corruption.

2.2.2 Public Engagement

Public participation is critical to the fight against corruption, as most corruption related crimes involve the public and their interaction with the state, public service and private enterprises. Public participation helps improve social accountability. To facilitate public engagement in anti-corruption, and social accountability, Government has put in place an enabling framework where individuals and groups such as NGOs, and civil societies can register, private and community radio stations. Government has also introduced toll-free lines and other platforms for citizen engagement. Nevertheless, weak legal protections for whistle-blowers and inadequate support for witnesses, hamper



citizens' engagement in anti-corruption actions. In 2020, the Afrobarometer reported that approximately 79.4% of citizens fail to report corruption for fear of retaliation.

Perceived inaction by Law Enforcement Agencies (LEAs) has also contributed to public loss of confidence in them. This contributes to fewer cases of corruption being reported. Further, the Office of the Public Protector is yet to adequately address maladministration and has weak feedback mechanisms. Limited knowledge and appreciation of the mandates and operations of LEAs and access to public information amongst citizens add to the challenges experienced by the public in fighting corruption. Limited collaboration among stakeholders such as religious groups, traditional leaders, civil society and the media on shaping the values, beliefs and culture of a society also poses a challenge by the public in fighting corruption.

2.2.3 Public Service Delivery

Government has been putting in place measures to enhance transparency and accountability in the public service to curtail corruption. The measures include: digitisation and automation of processes and procedures; increasing points of service delivery; expanding and increasing number of social amenities such as schools and health facilities, establishing Customer Service Centres; Service Charters and Integrity Committees. To legally augment these administrative actions, government in 2021, enacted the Electronic Government Act No. 41 of 2021. The Act, among others, provides for enhanced management and promotion of electronic Government services and processes; improve service delivery, administrative functions and citizens access to Government services and information.

Other key interventions include: the Treasury Single Account System, establishment of electronic government services, replacing cash payments for services with direct bank deposits, the electronic payment systems for services including taxes, permits, licences and identification documents so as to reduce opportunities and incentives for corruption based on face-to-face interactions. Investigative and security wings also sit on relevant committees constituted to handle specific matters such as recruitment and procurement, as a way of corruption prevention. To enhance social accountability and collaboration with civil society and other stakeholders, Government enacted the National Planning and Budgeting Act No. 1 of 2020 which, among others, creates platforms for civil society participation.

Despite the above reforms and measures to streamline some burdensome bureaucratic procedures as well as improving accountability and transparency in service delivery, institutional corruption has persisted. The ZBPI and Afro



Barometer surveys indicate that corruption is still rampant in delivery of public services such as health, education, permits/licences, customs, land administration and law enforcement. Citizen empowerment programmes and public service recruitments also tend to be vulnerable to corruption. Integrity Committees and Service Delivery Charters have not performed to the expectations on account of budgetary omissions and their nature of composition. The 2020 FIC Report identified areas of the public sector highly prone to corruption such as public procurement, licensing and permits, financing and revenue collection, administration, law enforcement, Judiciary and legal affairs. This was due to various reasons such as, avoiding delays, fear of being denied a service, acceptance of corruption as a norm, avoidance of paying penalties and frequency of personal interactions.

Other bottlenecks relate to overly centralised decision making, cumbersome bureaucratic procedures, red-tape and poor conditions of service in the public sector. Lack of integrity and greediness has further increased cases of corruption and embezzlement of public resources. In addition, overuse of manual systems due to slow uptake of Information Communication Technologies (ICT), limited geographical coverage, weak and intermittent civil society participation, patronage and overall limited accountability and access to relevant information. Moreover, where Integrity Committees have been established, they are affected by inadequate finances, limited ownership and inadequate reporting.

2.2.4 Public Procurement

Given the importance of Public Procurement to Zambia's socio-economic development, Government has endeavoured to strengthen accountability and transparency in public sector procurement. Alongside functional institutions, an electronic-government procurement (e-GP) system has been established to reduce opportunities for corruption. Another initiative is the development of the Market Price Index aimed at promoting and ensuring procurement of public goods, services and works are at the right price, quality and delivered on time. Where an item is not covered in the Market Price Index, a procuring entity undertakes a price reasonableness analysis. In addition, Government has put in place the Public Finance Management Act No.1 of 2018 and the Public Procurement Act, No. 8 of 2020. It has also put in place provisions that aim at deterring and punishing erring officers, including the mandatory debarment and publication of blacklisted companies and contractors, among others.

Despite these interventions, corruption in public procurement remains a challenge. According to the (FIC) Trends Report of 2021, public procurement is one of the activities in the economy and the public sector, which is at higher risk



of corruption. The increase in vulnerability of public procurement to corruption and fraud, has been attributed to the large amounts of monies involved in public procurement and the interest it draws from the business community, Politically Exposed Persons (PEPs) or Prominent Influential Persons (PIPs). Other bottlenecks include low adherence to procedures and regulations, weak enforcement of audit recommendations and abuse of procurement processes during emergencies.

2.2.5 Leadership, Ethics, Integrity and Values

Fighting corruption requires committed, accountable and ethical leaders with integrity, supported by systems and processes that are transparent. The Constitution provides for National Values, Principles, ethics, good governance and integrity. Government has also put in place institutional measures such as, National Guidance and Religious Affairs Policy to enhance the application of National Values and Principles and ethics in individual institutional and national affairs, the Public Service Code of Ethics as well as the Parliamentary and Ministerial Code of Conduct Act, among others, to promote integrity and ethical leadership in public affairs and service.

Moral degradation, poor leadership and unethical conduct, however, have been some of the issues contributing to high levels of corruption in the country. Very often, glorification of the corrupt leaders and individuals coupled with the inability by LEAs to swiftly deal with corrupt practices and individuals has worsened the situation. This has also contributed to society seeing corruption as rewarding rather than criminality.

2.3 CORRUPTION AND MANAGEMENT OF NATURAL RESOURCES

Zambia is endowed with various natural resources such as minerals, forestry, land and wildlife which have over the years generated revenue for the development of the country. Access and exploitation as well as management of natural resources are regulated by a number of institutions and departments such as the ministries responsible for Mines and Minerals Development, Lands and Natural Resources, Tourism, Wildlife and Parks and watchdog bodies like the Zambia Environmental Management Authority, Extractive Industries Transparency Initiative (EITI). Pieces of legislations such as the Mines and Minerals Development Act No.11 of 2015 and the Zambia Development Agency Act No.17 of 2022 are also in place.

However, there have been challenges in ensuring accountability and transparency in Zambia's extractives exist. In 2020, the FIC Trends Report indicated that K165 million of revenue was lost to illegal mining in precious metals and stones. This was mainly due to weaknesses in enforcing the laws



and regulations; and the growing trend of soliciting for bribes by public officers with influence in the issuance of licences and mining rights. Other areas prone to corruption include wildlife, forestry and land administration.

The ZBPI, has been ranking land administration as one of the services in which corruption is high. This is rife under traditional land tenure due to undeclared and obscure practices that breed and harbour corruption.

Additionally, according to a 2021 study by Transparency International Zambia, the looting of Zambia's forestry wealth was way beyond the original permits. This facilitated the transportation and stock piling of 'mukula' logs (Rosewood) estimates that the illegal trade generated of approximately US\$ 7.5-million in bribes and informal fees annually. These illicit transactions also took false declarations. What left Zambia as sawn wood seems to have arrived in China as logs to elude a log-export ban in force (2022 CIFOR infobriefs-forest news).

2.4 CORRUPTION, THE BUSINESS ENVIRONMENT AND PRIVATE SECTOR

The private sector is both a driver and a victim of corruption. To counter this, several interventions have been put in place. These include: promotion of e-Government services, One-Stop Shops, Regulatory reforms and the establishment of dialogue platforms such as the Public – Private Dialogue Forum. Government has also supported the establishment of Integrity Committees (IC's) in some private companies as well as conducting awareness on corporate governance.

A number of corruption cases involving private sector players have been recorded in the country mainly in the area of public procurement and licencing. The 2020 World Bank Group Enterprise Surveys of Zambia, show that two in ten companies report requests to give gifts or informal payments to public officials when trying to secure a contract or obtaining an operating licence and that one in ten companies experienced requests for bribes (The World Bank Group (2020) Enterprise Surveys – What Businesses Experience, Country Profile).

Additional areas of concern remain, such as irregular payments under customs administration. The 2017 EITI report also indicates low disclosure of beneficial ownership and shell companies, especially giant corporations in the mining sector. This situation is compounded by weak institutional and legal frameworks such as absence of a national corporate governance code to set minimum standards for anti-bribery and ethical conduct. For instance, only two (2) companies in the private sector had integrity Committees compared to 140 in the public sector as of October 2022. Another bottleneck is the limited understanding and informational gaps on the nature and extent of corruption in the private sector (International anti-corruption & integrity-US-PWC and World



Bank Group).

2.5 DEMOCRACY AND POLITICAL GOVERNANCE

Electoral corruption remains an impediment to democracy in Zambia according to the U4 Anti-Corruption Resource Centre and the 2020 Ibrahim Index of African Governance. To address some of the effects of corruption on democracy and political governance, Government through the Constitution (Amendment) Act No. 2 of 2016 and the Electoral Process Act No. 35 of 2016, strengthened provisions in the law to support the holding of credible, free and fair elections. The current legal framework on elections prohibits corruption in elections and provides for recourse actions and sanctions.

Despite these various reforms, electoral corruption remains a big challenge in Zambia. This has been attributed to inadequate enforcement and weak adherence to the electoral laws and regulations, coupled with lack of enabling legislation to regulate political parties and political party financing, despite this being provided for under Article 60 of the Constitution. Corruption and unregulated financing as well as donations to political parties, equally exert undue influence on politics and can undermine the integrity and credibility of elections. Corrupt candidates and their sponsors to gain illegitimate access to power, authority and public resources for their personal benefit and can subsequently lead to state capture.

2.6 CAPACITIES OF INSTITUTIONS FIGHTING CORRUPTION

Government has established various institutions to fight corruption and related crimes. These include Law Enforcement Agencies (LEAs), oversight institutions and other governance institutions. LEAs include: the ACC, Zambia Police Service and Drug Enforcement Commission (DEC). In addition, the country has the Anti-Money Laundering Authority established under DEC, which is comprised of officers from the LEAs whose mandate is to provide interagency coordination, conduct investigations and prosecutions of money laundering offences, among others. The FIC also complements the work of the ACC, DEC and other LEAs by tracking and reporting on suspicious financial transactions in the country. The Director of Public Prosecutions, head of the National Prosecutions Authority (NPA) is constitutionally mandated to prosecute all criminal matters in Zambia and gives consent for prosecution of corruption cases, among others. Additionally, there are specialised departments such as the Taxation and Financial Crimes, Asset Forfeiture, Gender Based Crimes and Appeals Departments which ensure efficiency in the prosecution of corruption cases. In January, 2022, Government established the Economic and Financial Crimes Court (Division of the High Court) to hear and determine matters relating to economic and financial crimes and corruption. In part, this was aimed at dealing with inefficiencies in handling corruption and related crimes.



Oversight institutions are vital to the prevention and eradication of corruption. These include: Office of the Auditor General which provides oversight through the audit of accounts of State organs and institutions financed by the State; Public Accounts Committee of the National Assembly that examines the accounts of expenditure reported in the Auditor General's Report; Office of the Public Protector (OPP) mandated to initiate, receive and investigate complaints of human rights, alleged or suspected maladministration; Judicial Complaints Commission (JCC) mandated to enforce the code of conduct for Judges and judicial officers; the Police Public Complaints Authority mandated to investigate complaints against police actions and make recommendations to the appropriate institutions or authority for action; and the Zambia Public Procurement Authority which is among others mandated to regulate the procurement of goods, works and services by procuring entities as well as ensure transparency and accountability in public procurement.

The Attorney-General, as the Chief Legal Advisor to the Republic of Zambia also plays a major role through law reform, legislative drafting as well as being a chief advisor and representative of Government in all legal matters. Ministries and other Government departments are also part of the national anti-corruption framework through their respective mandates as well as the Civil Society and Private Sector as essential vehicles for promoting integrity, accountability, transparency and behavioural change.

Despite this institutional framework, the LEAs, oversight institutions, private sector and the civil society are yet to establish effective and efficient collaborative mechanisms. This extends to limited coordination, cooperation and collaboration to facilitate inter-agency linkages in the fight against corruption. Further, LEAs and oversight bodies such as the ACC, DEC, FIC, NPA and OPP have limited geographic coverage as they are mainly found in provincial centres and selected districts.

2.6.1 Investigations, Prosecution and Punishment of Corruption

Efficient and effective detection, investigation, prosecution and punishment are cardinal to the fight against corruption. Effective countering of corruption has the potential to instil public confidence in institutions mandated to fight corruption and private sector investment. In this regard, Government has established investigative and prosecutorial bodies to handle cases of corruption. However, there are bottlenecks to efficient and effective investigations, prosecution and punishment of corruption in Zambia. For instance, the delays in the justice system have a negative impact on the fight against corruption. According to the 2017 ACC Annual Report, 93 cases were taken to court, only 25 cases were concluded successfully. In 2020, out of 78 cases that were taken to court only 20 were concluded.



This has been attributed to high attrition of specialised or experienced staff in investigative bodies, mainly due to limited incentives such as upward mobility and conditions of service. Further, officers responsible for fighting corruption and related crimes have insufficient technical capacities. Currently, majority of the officers undergo general law enforcement training, which only equips them with some basic skills and knowledge. These challenges have also contributed to low public confidence in the law enforcement agencies.

The legal requirement of the DPP to give consent before any prosecution can commence causes delays as they are no timelines attached. At another level, exercise of discretionary authority by officers in LEA's and the Judiciary as well as Constitutional office holders often presents problems for lack of sufficient controls, accountability and transparency.

Additionally, officials constitutionally classified as state officers cannot easily be prosecuted under the Anti-Corruption Act. The current definition of the public officer in the Constitution excludes state officers, councillor, constitutional office holder, judge and judicial officer from the definition of public officer as provided for under the Anti-Corruption Act. This classification makes it difficult to prosecute such offences under the Anti- Corruption Act.

Corruption is a very serious offence with dire consequences on the country. Currently, the Anti-Corruption Act provides for a maximum sentence but does not provide for a minimum sentence. Therefore, courts have tended to pass lenient sentences such as suspended sentence or lower sentences of 3 or 6 months which do not effectively deter would be offenders.

2.6.2 Asset Recovery

Regarding recovery of corruptly acquired assets, Government has enacted laws that underpin both conviction and non-conviction-based approaches as well as established relevant institutions. They include the Forfeiture of Proceeds of Crime Act No. 19 of 2010 and the Prohibition and Prevention of Anti-Money Laundering Act No. 14 of 2001, among others. Despite this, impediments still exist at various fronts. At domestic level, the national central repository for forfeited assets to enhance accountability in the management and disposal of forfeited assets is absent, despite the law providing for its establishment. Therefore, forfeited assets are left to chance as there is no clear management system and uniformity in handling forfeited assets among LEAs. Further, capacities of investigative bodies, prosecutions and adjudicators are also insufficient in this area. At regional and international level, unresponsiveness from some host countries; conflicting legal regimes and absence of bilateral agreements on mutual legal assistance, hinders efforts towards asset recovery.



2.6.3 Collaborative Mechanisms

Inadequate coordination and, communication among Law Enforcement Agencies also affect investigations and prosecution of cases. Targeted joint operation teams are sometimes constituted for purposes of bolstering and expediting investigations and prosecution of specific corruption matters. These *ad hoc* administrative arrangements, however, often contribute to inefficiencies, ineffectiveness and duplication of efforts. This is compounded by lack of a central automated system for management of cases and data across institutions.

2.6.4 Human and Financial Resources

Inadequate human and financial resources have been a major challenge for the implementation of the National Anti-Corruption Policy. Equally, inadequate financing and human resource capacity of LEAs, prosecutions and adjudicators has negatively affected operations of these agencies especially ACC as the lead institution in the fight against corruption.

2.6.5 Uptake of Technology

Adoption of technology in crime control and data management places critical value to enhanced anti-corruption measures such as prevention, investigations and prosecution. Regrettably, there is slow adoption and access to technology occasioned by limited infrastructure, investment and competencies to support such innovations in anti-corruption.

2.7 CORRUPTION AND GENDER

Government has been implementing some anti-corruption and accountability initiatives targeted at women and the youth. They include dialogue platforms; school clubs; awareness activities and involvement in social accountability initiatives by various civil societies. Despite these initiatives, the vulnerability of women and youths to corruption is still high. Often, anti-corruption interventions have tended to be general. These gaps relate to absence of gender sensitive interventions on whistle-blower and witness protections; inadequate targeted education programmes; poor feedback mechanisms and limited engagement mechanisms, coupled with existing cultural barriers.

Corruption disproportionately affects those living in poverty and those who are poor, illiterate and unaware of their rights and entitlements. Many forms of corruption affect both women and men, but given the unequal gender relations in society, women are in many settings more exposed to corruption and its consequences. The country has more women than men who are classified as poor, unemployed, uneducated and lack access to control of finances. Corruption also increases women's vulnerability to crimes such as



human trafficking. Further, women are affected by the growing phenomenon of sextortion and exploitation where they may have no resources to pay bribes.

Zambia has enacted the Gender Equity and Equality Act No. 22 of 2015 which mandates all public and private bodies to mainstream gender in all budgets, plans and activities. Gender mainstreaming ensures women, men, girls and boys benefit equally from the development process by highlighting the impacts of policies, programmes and laws on the real situation of women, men, girls and boys. The Act prohibits discrimination and gender bias in the provision of any services to women such as awarding of contracts, accessing education and health services. Enforcing this law would eliminate points in public service delivery which are open to exploitation of women. However, there has been weak enforcement and adherence to this Act. As a result, systems and practices are still in existence that are utilised to exploit women through corrupt means.

2.8 POLICY COORDINATION, MONITORING, EVALUATION AND REPORTING

Effective policy coordination, monitoring and evaluation is important for the successful implementation of all national policies. However, coordination, monitoring and reporting on implementation have not been effective.

This could be attributed to limited capacity of the ACC to effectively coordinate and mainstream corruption issues at all levels of governance; lack of a comprehensive coordination, monitoring, evaluation and reporting structure and mechanism; and inadequate financing to support policy implementation. Further, few institutions and stakeholders have been taking an active role in implementing anti-corruption interventions. Most stakeholders have not been participating in policy implementation, as they feel the National Anti-Corruption Policy belongs to the Anti-Corruption Commission and that they would be performing functions of the Commission.



3 VISION, RATIONALE AND GUIDING PRINCIPLES

3.1 VISION

“A nation that is zero tolerant to corruption.”

3.2 RATIONALE

The revision of the National Policy on Anti-Corruption stems from the need to holistically address corruption in the country that continues to pose a challenge in the development agenda for Zambia.

An evaluation of the 2009 National Anti-Corruption Policy, highlights challenges with the legal, institutional and social frameworks of the Policy. Challenges in the Legal framework include the variance in the provisions of the Constitution (Amendment) Act No. 2 of 2016 and subsidiary legislation. At institutional level challenges include inadequate representation of stakeholders in the National Steering Committee, limited coordination among stakeholders and inadequate coordination among the LEA's. At social level, issues identified include challenges with mind-set, attitude and perceptions towards corruption as well as limited participation of civil society organisations in the fight against corruption. Therefore, this Policy seeks to address these identified challenges through a national and inclusive approach.

It also seeks to address emerging accountability and corruption issues affecting Zambia in areas such as public service delivery, integrity, institutional performance, and management of public resources, corruption vulnerabilities under public procurement, private sector and corporate governance. Other corruption issues include: exploitation of the country's mineral and natural resources, gender in corruption, unethical conduct by public servants and the observed decline in the moral and ethical conduct of the citizenry at large. The Policy will serve as the framework that will efficiently and effectively guide interventions in the fight against corruption in Zambia. It will enhance the fight against corruption and contribute to building confidence in the people of Zambia of their governance system and institutions. It will also enhance human dignity, rule of law, access to justice, service delivery, transparency and accountability as well as contribute to social and economic development.

3.3 GUIDING PRINCIPLES

In recognition of the aspirations of the Government and the people of Zambia to achieve zero tolerance to corruption, this Policy is founded on the following principles:

- (a) **Constitutionalism and the Rule of Law:** The fight against corruption will be conducted in compliance with the provisions of the



Constitution, and laws of the Republic of Zambia, in a manner that safeguards basic human rights, freedoms and equality before the law;

- (b) **Political Will and Leadership:** To successfully champion the fight against corruption, the Nation will rely on a leadership that will put service before self and ensure the prudent management of the country's resources and affairs;
- (c) **Transparency and Accountability:** The fight against corruption shall be conducted in an open and accountable manner with the engagement and participation of various stakeholders;
- (d) **Morality and Ethics:** This Policy requires for concerted effort from various stakeholders to promote good morals and ethics as corruption has permeated the moral fibre of society. Therefore, the fight against corruption will be achieved by addressing the scourge through social structures that shape our behaviour;
- (e) **Partnerships and Inclusivity:** The fight against corruption calls for concerted efforts from both public and private institutions. This demands for an all-inclusive development of strategic partnerships and alliances that facilitate co-ordinated implementation of anti-corruption activities;
- (f) **Independence and Impartiality:** Institutions spearheading the fight against corruption shall execute their functions with neither undue influence nor interference; and
- (g) **Ownership:** The fight against corruption is the responsibility of every person in Zambia.



4 POLICY OBJECTIVES AND MEASURES

4.1 Policy Objectives

The objectives of this Policy are to: -

- (i) strengthen corruption prevention measures in public and private bodies;
- (ii) strengthen transparency and accountability in public affairs and delivery of public services;
- (iii) strengthen institutional capacities of the Anti-Corruption Commission, National Prosecutions Authority and other law enforcement agencies involved in preventing and combating corruption and related crimes;
- (iv) promote mind-set and behavioural change amongst the general public against corruption.
- (v) strengthen the legal and institutional anti-corruption frameworks; and
- (vi) strengthen co-ordination, partnerships, collaboration, monitoring, evaluation and research on anti-corruption.

4.2 Policy Objective 1 and Measures

Policy Objective 1: To strengthen corruption prevention measures in public and private bodies.

Policy Measures:

- (i) Enhance Transparency and Accountability in Public and Private Bodies;
- (ii) Promote corporate governance and integrity in both Public and Private Bodies;
- (iii) Mainstream integrity committees and other corruption prevention



in both public and private Sectors; and

- (iv) Mainstream the National Values and Principles in both public and private institutions.

Policy Objective 2: To strengthen transparency and accountability in public affairs and delivery of public services.

Policy Measures:

- (i) Strengthen accountability and integrity in democracy and political governance;
- (ii) Expand electronic delivery of public services and payment systems;
- (iii) Enhance accountability in public procurement management;
- (iv) Enhance integrity, transparency and accountability in the provision of public services;
- (v) Promote meritocracy and transparency in appointments and promotions under the Public Service; and
- (vii) Enhance Transparency and Accountability in the management of natural resources.

Policy Objective 3: To strengthen institutional capacities of the Anti-Corruption Commission, National Prosecutions Authority and other law enforcement agencies involved in preventing and combating corruption and related crimes;

Policy Measures:

- (i) Enhance the human and technical resource capacity of Anti-Corruption Commission and other Law Enforcement Agencies to prevent, investigate and prosecute corruption;
- (ii) Enhance the institutional capacities of the Anti-Corruption Commission and other Law Enforcement Agencies involved in fighting corruption;



- (iii) Enhance the capacity of Courts of Law in handling corruption, financial and economic crimes cases; and
- (iv) Enhance recovery, management and disposal of assets.

Policy Objective 4: To Promote Mind-Set and Behavioural Change Amongst the General Public Against Corruption.

Policy Measures:

- (i) Enhance knowledge levels on corruption amongst learners;
- (ii) Enhance knowledge levels and action on anti-corruption, accountability and transparency in communities; and
- (iii) Promote gender and youth responsive anti-corruption empowerment interventions.

Policy Objective 5: To strengthen the anti-corruption legal framework.

Policy Measures:

- (i) Review, harmonise and enact relevant legislation in the fight against corruption and associated crimes; and
- (ii) Adopt and domesticate regional and international instruments and mechanisms for preventing and combating corruption.

Policy Objective 6: To strengthen co-ordination, partnerships, collaboration, monitoring, evaluation and research on anti-corruption.

Policy Measures:

- (i) Enhance institutional capacities to coordinate implementation of the NPAC;
- (ii) Strengthen national and international collaboration among law enforcement agencies, civil society, private sector and citizens;



- (iii) Strengthen monitoring, evaluation and reporting mechanisms; and
- (iv) Strengthen research and utilisation of research findings on anti-corruption.



5 IMPLEMENTATION FRAMEWORK

5.1 INSTITUTIONAL ARRANGEMENTS

The following institutional arrangements are required to facilitate efficient and effective implementation of this Policy.

The National Policy on Anti-Corruption recognises the multi-sectorial nature of cooperation needed to address the problem of corruption in the country and its detrimental effects on society and national development. The institutional framework on the fight against corruption includes both state and non-state actors such as Cabinet Office, ministries and provinces, law enforcement agencies, oversight institutions, and partners such as traditional leaders, cooperating partners, private sector institutions, Civil Society Organisations, Faith Based Organisations and society at large.

All these institutions and other stakeholders are expected to play a role in the fight against corruption. Implementation of the Policy and reporting at sector and local governance levels, will be done through existing structures and other support structures as follows:

- (i) **Cabinet Office:** As the overall Government institution responsible for overall policy formulation, implementation and evaluation will provide oversight over coordination, implementation and evaluation of the Policy.
- (ii) **Office of the Vice-President:** Shall spearhead interventions aimed at fighting corruption through national guidance and promotion of National Values and Principles.
- (iii) **Ministry responsible for Justice:** Shall be responsible for providing leadership and reporting on the implementation and performance of the Policy. The Ministry shall also promote good governance initiatives, facilitate legislative drafting and revision, legal advice and mutual legal assistance as well as ratification and domestication of relevant international instruments necessary for effective accountability and countering corruption.
- (iv) **The Anti-Corruption Commission:** as the national principal anti-corruption agency in the implementing the policy,



the Commission shall lead implementation of all Policy interventions on corruption prevention and detection, investigations and prosecution as well as public education and engagement. This will also include routine planning, monitoring activities and provision of technical advice across institutions and guide initiatives under anti-corruption technical working structures.

- (v) **Ministry responsible for Home Affairs and Internal Security:** shall mainstream anti-corruption in its programmes and enhance the capacities of law enforcement agencies to prevent and prosecute corruption and related crimes.
- **The Zambia Police Service:** Shall within their mandate detection, arrest and prevention of all crimes related to corruption, economic and financial crimes.
 - **The Drug Enforcement Commission (DEC):** shall be responsible for the detection, prevention and combating of drug trafficking, Money Laundering and related offences to which corruption is often a predicate offence.
 - **The Department of Immigration:** shall ensure integration of anti-corruption and accountability measures in the regulation of movement of persons entering and leaving the country as well as human trafficking.
 - **The Registrar of Societies:** Shall be responsible for ensuring accountability and transparency in the registration of societies in the country in order to provide for better control and supervision of societies.
- (vi) **Ministry responsible for Finance and National Planning:** mobilise and provide financial resources for the implementation of the Policy.
- (vii) **The Zambia Public Procurement Authority:** shall formulate, regulate, set standards, enforce compliance and performance monitoring, professional development, information management and dissemination to address corruption in public procurement.
- (viii) **The Financial Intelligence Centre:** shall receive, request, analyse and



disseminate suspicious transaction reports concerning suspected Money Laundering (ML), Terrorist Financing (TF) and other serious offences to competent authorities including the ACC for investigations.

- (vi) **Ministry responsible For Foreign Affairs and International Cooperation:** shall support the fight against corruption by interfacing with the international community, states and other foreign partners in the fight against corruption and collaborate with the Ministry of Justice and ACC on complying with obligations to international organisations on the fight against corruption.
- (vii) **Ministry responsible for Information and Media:** shall facilitate sensitization and dissemination of information on anti-corruption, accountability and transparency.
- (ix) **Ministry responsible for Local Government and Rural Development:** shall mainstream anti-corruption initiatives in local governance structures and to traditional leaders. It will also support implementation of anti-corruption initiatives aimed at improving service delivery as well as curb corrupt activities in licensing, land allocations, markets and bus stops, and other core business activities.
- (x) **Ministry responsible for Labour and Social Security:** shall mainstream anti-corruption activities in the employment sector and social security related interventions.
- (xi) **Ministry responsible for Community Development and Social Services:** shall mainstream anti-corruption activities in communities and social protection programmes as well as the regulation of NGOs.
- (xii) **Ministry responsible for Education:** Shall mainstream anti-corruption activities in institutions of learning and the curriculum at all levels of the education system.
- (xiii) **Ministry responsible for Lands and Natural Resources:** Shall mainstream anti-corruption interventions in land and natural resource administration and systems including in service delivery.
- (xiv) **All other Ministries Provinces and Spending Agencies:** shall be responsible for implementing specific interventions on preventing corruption in line with their portfolio functions.
- (xv) **The Electoral Commission of Zambia:** Shall ensure the inclusion of anti-



corruption, accountability and transparency interventions in the electoral process, and ensure adherence to the electoral code of conduct and regulations to ensure that elections, political parties and candidates are free of corrupt practices.

- (xvi) **The Service Commissions:** Shall be responsible for ensuring integrity, transparency and accountability in the conduct of appointments, promotions, disciplinary control, regulation of the conditions of employment and separations in the public service to enhance delivery of quality services in line with the Codes of Conduct for employees in fighting corruption.
- (xvii) **Independent Offices (Judicial Service Commission and Police Public Complaints Commission):** Shall ensure integrity, professionalism and propriety in the exercise of authority by relevant offices, enforce the Code of Conduct for all personnel to be accountable the people for the performance of their functions, receive and hear complaints lodged against officers and make recommendations to the appropriate body or authority for action.
- (xviii) **The Judiciary:** shall ensure timely hearing and adjudication over matters related to corruption, economic and financial crimes as well as other related cases in an impartial and expeditious manner to prevent and combat corruption.
- (xix) **The National Assembly and Parliament:** shall be responsible for enacting relevant anti-corruption laws and providing oversight on ensuring accountability and transparency in the management of financial and public affairs for effective measures in countering corruption in both the public and private sectors.
- (xx) **The Office of the Auditor General:** shall provide oversight on the prudent use of public funds through the audit of accounts of State organs and institutions, financed by the State. The Office shall also be responsible for conducting specific audits considered as desirable in the public interest to curb corruption, economic and financial crimes.
- (xxi) **The Office of the Public Protector:** Shall fight maladministration in Government, in line with their mandate, by initiating, receiving and investigating complaints of alleged or suspected maladministration of state institutions in decision making and service delivery.



- (xxii) **The National Prosecution Authority:** shall timely authorise and prosecute corruption and related cases in a transparent, accountable and expeditious manner.
- (xxiii) **The Zambia Centre for Inter-Party Dialogue:** Shall be responsible for promoting anti-corruption, transparency and accountability amongst political parties.
- (xxiv) **Civil Society:** NGOs, Community Based Organisations, Faith Based Organisations and general civil society shall play the role of whistle-blowers, advocacy and education in promoting values of integrity, accountability, and transparency in the fight against corruption.
- (xxv) **Private Sector:** shall mainstream and observe corruption prevention mechanism in their conduct of business.
- (xxvi) **Co-operating Partners:** shall collaborate with the Government of the Republic of Zambia to provide the required technical and financial support to implement the Policy.
- (xxvii) **Research Institutions and Academia:** shall facilitate generation of knowledge and undertaking of research to inform the development of effective interventions against corruption.
- (xxviii) **The Media, public and private: and Community-based** shall play an important role in reporting as well as raising awareness on preventing and combating corruption and related crimes through print and electronic means or otherwise.

5.2 LEGAL FRAMEWORK

The main legislation guiding the implementation of this Policy are the Constitution Amendment Act No. 2 of 2016 and the Anti-Corruption Act No. 3 of 2012. Other laws that complement the legal framework include: Public Interest Disclosure (Protection of Whistle Blowers) Act No. 4 of 2010; the Forfeiture of Proceeds of Crime Act No. 19 of 2010; the Public Finance Management Act No.1 of 2018; the Plea Negotiation and Agreements Act No. 20 of 2010; the Prohibition and Prevention of Money Laundering (amendment) Act No. 44 of 2010; the Financial Intelligence Centre Act No. 46 of 2010 and the Public Procurement Act No.8 of 2020, among others.



To strengthen the legal framework, some pieces of legislation will need to be reviewed and new ones introduced accordingly. Some of the key laws that need revision, among others, include the following:

- (a) amend the Constitution of Zambia (Amendment) Act No. 2 of 2016 to change the definition of a Public Officer to include a State Officer, Councillor, Constitutional Office Holder, Judge and Judicial Officer;
- (b) amend the Anti-Corruption Act No.3 of 2012 to harmonise it with the Republican Constitution and to provide for a minimum mandatory sentence and deal with consent requirements, among others;
- (c) amend the Criminal Procedure Code Chapter 88 of the Laws of Zambia;
- (d) amend the Plea Negotiations Authority Act No. 20 of 2010 to provide for the sentence in the Plea Negotiation process;
- (e) develop regulations under the Forfeiture of Proceeds of Crime Act No.19 of 2010, to enhance accountability and transparency in the management and disposal of forfeited assets and central repository;
- (f) amend provisions of relevant Acts relating to corruption and economic crimes in order to provide for limitations or exceptions on sanction to prosecute corruption cases; *inter alia*, such as section 64 of the Anti-Corruption Act No.3 of 2012;
- (g) enact new legislation on declaration of assets by all persons in the public service;
- (h) enact legislation on access to information;
- (i) enact consequential legislation on establishing the Political Party Fund and Political Party financing;
- (j) review and amend the Public Interest Disclosure Act No. 4 of 2010 to provide for adequate protection of whistle blowers and witnesses; and
- (k) undertake domestication of relevant provisions of regional and international anti-corruption instruments.

5.3 RESOURCE MOBILISATION

To ensure sustainable implementation of the Policy, Government is committed to funding and mobilising resources for the Policy. In addition, the Government will partner with both internal and external Cooperating Partners. To address



financial sustainability challenges and enhance implementation of activities under this Policy, Government will ensure that part of the resources from the Forfeited Asset Fund are channelled to this cause. Further, Government shall establish innovative sustainable funding mechanisms for implementation of the Policy which will include mainstreaming of anti-corruption initiatives in the National Budget and development of a Resource Mobilisation Strategy and its implementation plan.

5.4 MONITORING AND EVALUATION

The Monitoring and Evaluation will form an integral part of the assessment of the progress being realised in the implementation of the National Policy on Anti-Corruption. The Monitoring and Evaluation of the Policy shall be jointly spearheaded by the Ministry of Justice and the Anti-Corruption Commission.

Government will work closely with the private sector, academia, Civil Society Organisations and Cooperating Partners to ensure that the fight against corruption is upheld throughout the Policy period.

To ensure effective implementation of the Policy, the Government, through the various institutions responsible for the fight against corruption, will put in place a comprehensive monitoring and evaluation system that will track implementation and impact of interventions on corruption. To fulfil this, the Government will:

- (a) develop a Monitoring and Evaluation framework for the Policy;
- (b) prepare national bi-annual and annual reports;
- (c) conduct mid-term and end-term review; and
- (d) conduct surveys on the state of corruption in Zambia.

6 ANNEXURE: POLICY IMPLEMENTATION PLAN MATRIX 2024 - 2028

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)	
				2023	2024	2025	2026	2027			2028
Objective 1: To Strengthen Corruption Prevention Measures in Public and Private Bodies											
	Organise Targeted joint Ethics and Integrity Seminars for public Officials and the Private Sector.	No. of Seminars on Ethics and Integrity for Officials in State Bodies and the Private Sector.		30	30	30	30	30	30	OPP; ACC; Service Commissions; MDD; NAZ; Judiciary; National School of Government; CSOs	3,000,000
		No. of officers from private bodies trained in Integrity and Professional Conduct.		150	150	150	150	150	150	OPP; ACC; CSOs	1,500,000
	Reward Exemplary Integrity and Ethical Conduct.	No. of Persons (Natural/Legal) Recognised and Awarded for Exemplary Integrity and Ethical Conduct.		40	40	40	40	40	40	ACC; OPP; Service Commissions; Cabinet Office; CSOs; Professional Bodies; MPSAs	500,000
	Monitor the Conduct of Public Affairs, Decision Making and Procurement Processes in Public Institutions.	Proportion of the Selection, Recruitment, licencing, Allocation and Procurement Processes in Public Institution Monitored by LEAs.		40%	35%	40%	40%	45%	50%	OPP; ACC; Oversight/Service Commissions; NAZ; Professional Bodies, CSOs	10,000, 000
	Advocacy and Awareness on Access to Public Information.	No. of Advocacy Activities Undertaken.		20	20	20	20	20	20	CSOs; Media; OPP; HRC; NAZ; MPSAs; MoMI	2,000,000
	Conduct Corruption Risk Assessments.	No. of Institutions Where Corruption Risk Assessments are Conducted.		1	3	3	3	3	3	ACC; OPP; DEC; OAG; NPA; ZPS; CSOs	3000,000
		No. of Institutions where Anti-Corruption Mitigation Measures are Implemented.		1	3	3	3	3	3	ACC; OPP; DEC; OAG; NPA; ZPS; CSOs	

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)	
				2023	2024	2025	2026	2027			2028
1.2. Promote Corporate Governance and Integrity in Both Public and Private Bodies.	Develop and Implement a Corporate Governance Code Framework.	Corporate Governance Code Developed and Implemented.		0	1	0	0	0	0	MoJ; ACC; OPP; Cabinet Office; MoF; OAG; IOD; CSOs, Professional Bodies; Private Sector	2,000,000
	Conduct Capacity Building in Corporate Governance.	No. of Trainings Conducted.		5	5	5	5	5	5	MoJ; ACC; MPSAs; MoSME; IOD; OPP; ACC; MoJ; Cabinet Office; CSOs; MoCTI; Private Sector	3,500,000
	Review and Develop Codes of Ethics and Conduct for Corporate Bodies.	Proportion of Public and Private Bodies with Codes of Ethics and Integrity Standards.		0.2	0.3	0.4	0.5	0.7	0.7	Cabinet Office; MoJ; ACC; MoCTI; MoFNP; MoSME; IOD; OPP; MoJ; Private Sector; Cabinet Office; CSO's	4,000,000
	Develop regulations on Gifts and Benefits for the Public Service.	Regulations on Gifts and Benefits for the Public Service Developed.			1	0	0	0	0	Cabinet Office; OPP; MoJ; Service Commissions; ACC; NPA; Professional Bodies; IOD	200,000
1.3. Mainstream Integrity Committees, Culture of Integrity and other Corruption Prevention Measures in Both Public and Private Sectors.	Conduct Advocacy and Public Engagement on Corporate Governance and Leadership.	No. of Advocacy events on Corporate Governance Conducted.		10	10	10	10	10	10	CSOs; IOD; Media; MoIM; OPP; Service Commissions; MPSAs, Professional Bodies	2,000,000
	Establish Integrity Committees.	Proportion of public Bodies with ICs established.		60%	70%	80%	90%	100%	100%	ACC; Cabinet Office; OPP; CSOs	5,000,000
		No. of Private Bodies with Established Integrity Committees.		5	5	5	5	5	5	ACC; Private Sector; CSOs, OPP, Professional Bodies; IOD	1,000,000
		Proportion of local Authorities with Established IC's.		45%	50%	55%	60%	65%	65%	ACC; MLRUD; Local Authorities; LGSC; Cabinet Office; CSOs	8,800,000
	Develop a Roadmap/Strategy for the Establishment of Integrity Committees.	Roadmap on Rolling out of Integrity		1	00	00	00	00	00	ACC; MPSAs; CSOs; Private Sector	550,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)
				2023	2024	2025	2026	2027		
		Committees Developed.								
	Establish full time IC secretariat in all Public Bodies.	Proportion of public bodies with full time IC secretariat established.		0.0	0.1	0.2	0.3	0.4	ACC, Cabinet Office; MPSAs	45,000,000
	Assess the Performance and Establishment of ICs.	Proportion (%) of ICs assessed.		0.5	0.6	0.7	0.9	1	ACC; OPP; MDD; MPSAs; CSOs; Media	1,500,000
	Establish Mechanisms for Complaints of Mal-administration in Public Bodies.	Proportion of targeted Institutions with Mechanisms for complaints on Mal-administration.		0.4	0.5	0.6	0.7	0.8	OPP; Cabinet Office; MDD; NAZ; ACC; CSOs	5,000,000
	Monitor performance of Mal-administrative Complaints Mechanisms.	Proportion (%) of Mal-administrative Complaints Mechanisms Monitored.		0.4	0.5	0.6	0.7	0.8	OPP; NAZ; ACC; CSOs; Media; MPSAs; MDD	2,000,000
	Establish Mechanisms and enforce regulations on Disclosures and Enforcement of Beneficial Ownership.	Regulations on Beneficial Ownership established.		0	1	0	0	0	PACRA; ACC; DEC; FIC; NPA; MoHAIS; MoJ; CSOs; ZPPA	500,000
	Conduct Anti-Bribery Vetting of Businesses.	Percentage of Business Entities with Anti-Bribery and Corruption Policies.		5%	10%	12%	30%	50%	ACC; DEC; OPP; ZPPA; Private Sector; CSOs	2,000,000
	Review Anti-Bribery Compliance Standards for the Private Sector.	Anti-Bribery Compliance Standards Reviewed.		0	1	0	0	0	ACC; DEC; NPA; Private Sector; MoJ; PACRA; MoCTI; Judiciary; CSOs	700,000
	Undertake Capacity Building on Anti-Corruption and Integrity in Service Commissions and Professional Bodies.	No. of Capacity Building in Anti-Corruption and Integrity Undertaken.		10	10	10	10	10	ACC; OPP; CSOs Professional Bodies; Private Sector; Service Commissions;	900,000
	Conduct Campaigns on Private Sector Anti-Bribery and Integrity.	No. of Campaigns Conducted.		20	20	20	20	20	CSOs; Media; ACC; DEC; Private Sector; MoIM; FIC	6,000,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)
				2024	2025	2026	2027	2028		
1.4. Mainstream the National Values and Principles in Both Public and Private Institutions.	Hold Regular Engagements on Anti-Corruption and Accountability.	No. of Engagements Held with Private Sector.	2023	10	10	10	10	10	ACC; DEC; OPP; DEC; Private Sector; ZPPA; PACRA; Business Associations; CSOs	3,000,000
	Undertake seminars on National Values and Principles	No of seminars on National Values and Principles undertaken		10	10	10	10	10	OVP; FBOs; House of Chiefs; CSOs; Media	1,500, 000
	Provide progress Reports on the application of National Values and Principles.	No of progress Reports on the application of National Values and Principles.		1	1	1	1	1	OVP; Cabinet office; MPSAs; CSO; FBOs; Media	50,000
	Develop a guideline on integrating National Values and Principles in Workplace Policies.	Guideline on integrating National Values and Principles in Workplace Policies Developed.		0	0	0	0	0	OVP; Cabinet, CSO MPSAs; CSO; Private Sector; FBOs	150, 000
	Integrate National Values and Principles in Workplace Policies.	Proportion of Institutions that have National Values and Principles Integrated in their Workplace Policies.		0.4	0.5	0.6	0.7	0.8	OVP; Cabinet; MPSAs; CSOs; Private Sector; FBOs	350, 000
Objective 2: To Strengthen Transparency And Accountability in Public Affairs And Delivery Of Public Services	Conduct National-Wide Public Sensitisations on National Values and Principles.	No. of National-wide Public Sensitisations in each Province on National Values and Principles Conducted.		10	10	10	10	10	OVP; Cabinet; MPSAs; CSOs, Media; Private Sector; FBOs	6,000,000
	Objective 2: To Strengthen Transparency And Accountability in Public Affairs And Delivery Of Public Services									
	2.1. Strengthen Integrity in Democracy and Political Governance.	Review and Establish Mechanisms for Verification and Tracking of Assets and Liabilities Declarations by Persons seeking and/or in Elective, Nominated and Appointed to Public Office.	Mechanism for Declarations Verification in Place.		0	1	0	0	0	OVP; Cabinet Office; ACC; OPP; ECZ; MoJ; NAZ; Investigative Bodies; Judiciary; CSOs;
		Proportion of Persons seeking and/or in Elective, Nominated and Appointed to Public Office Vetted		0.6	0.7	0.8	0.9	1		

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)	
				2023	2024	2025	2026	2027			2028
	Create a Mechanism for Institutional Linkages to Enforce Codes of Conduct and Declaration of Assets and Liabilities for Elective Offices	Mechanism for Institutional Linkages to Enforce Codes of Conduct in place.		0	1	0	0	0	0	OVP; Cabinet Office; LEA's; ACC; ECZ, NAZ; Judiciary; MoJ; CSOs	300,000
	Undertake Campaigns on Electoral Accountability and Integrity.	No. of Education Activities Undertaken.		50	50	50	50	50	50	CSOs; ECZ; ACC; ZCID; MoHAIS; NAZ	4,000,000
	Organise sensitisation engagements for Political Office Holders on Anti-Corruption and Integrity	No. of Educational Engagements on Anti-Corruption, Ethical Conduct and Integrity Undertaken.		50	50	50	50	50	50	ACC; CSOs; DEC; OPP; ECZ; NAZ; ZCID;	15,000,000
	Engage Members of Parliament and Civic Leaders on Accountability and Anti-Corruption in Politics	No. of Engagements with Parliament and Civic Leaders Conducted.		10	10	10	10	10	10	ACC; ECZ; NAZ; MOJ; ZCID; CSOs MoHAIS; APNAC; FBO's; CSOs	10,000,000
	Conduct Lifestyle Audits for Constitutional Office Bearers; Senior Government Officials; Political Office Bearers and Ministerial Offices	Proportion of Constitutional Office Bearers; Senior Government Officials; Political Office Bearers and Ministerial Offices where Lifestyle Audits are Conducted.		0.05	0.10	0.15	0.20	0.25	0.25	DEC; ACC; NAZ; OAG; Cabinet Office; CSOs; Media	500,000
2.2. Expand Electronic Delivery of Public Services and Payment Systems	Engage Internet Providers to ensure access to Reliable Internet	Availability of Reliable Internet		1	1	1	1	1	1	MoTS; SMART Zambia; MoFNP; ZICTA; MoIHUD; MIPSAs, ISPs	100,000
	Expand Electronic Service Delivery Platforms	Proportion of public services on Electronic Public Service Delivery Platforms		0.2	0.3	0.4	0.5	0.6	0.6	MDD; MoTS; SMART Zambia; MoFNP; MoTS; MIPSAs; Private Sector	20,000,000
	Organise Public Sensitisation on Use of Electronic Platforms to	No. of Sensitisation Programmes Conducted		50	50	50	50	50	50	SMART Zambia; MoIM; MoTS; MPSAs; CSOs; Media	400,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)
				2023	2024	2025	2026	2027		
2.3. Enhance Accountability in Public Procurement Management	Access Government Services									
	Capacity Building for Officers in Electronic Service Delivery and Customer Service in Targeted Institutions	No. of Officers Trained		100	80	80	60	50	SMART Zambia; Cabinet Office; OPP; MPSAs	2,000,000
	Review the e-GP System	e-Government Procurement System Reviewed		0	1	0	0	0	ZPPA; MoFNIP; Smart Zambia; MPSAs; CSOs	500,000
	Enrol More Procuring Entities on the e-GP System	Proportion of Procuring Entities using the e-Government System		0.4	0.5	0.6	0.7	0.8	ZPPA; MoFNIP; Smart Zambia; MPSAs; CP's	200,000
	Roll-Out Technical Support on the Operations of the e-GP System	No. of Procuring Entities on the e-Government Procurement System		100	100	100	100	100	ZPPA; MoFNIP CSOs; ACC; DEC; MPSAs	2,500,000
	Review and Develop a Comprehensive Pricing Index Incorporating High Value goods and Services such as Civil Works and Infrastructure, Pharmaceuticals and Fertiliser.	Comprehensive Pricing Index in Place and Reviewed Quarterly and in Place and Accessible		0	1	0	0	0	ZPPA; MoFNIP; ZAMSTATS; OAG; MPSAs	600,000
	Train Suppliers and Procurement Entities on the e-GP	Suppliers and Procuring Entities Trained		100	100	100	100	100	ZPPA; MoFNIP; CSOs; ACC; DEC; MPSAs	1,000,000
	Review and Revise Code of Conduct for Procurement Officers	Procurement Code of Conduct Revised and in Force		0	1	0	0	0	ZPPA; ZIPS; OPP; ACC; Cabinet Office; MoJ; MPSAs; CSOs	2,000,000
		No. of Procurement and Integrity Trainings on the Reviewed Code of Conduct.		0	0	30	30	30	ZPPA; ZIPS; OPP; ACC; Cabinet Office; MoJ; MPSAs; CSOs	5,000,000
		Integrity Pacts Between Procuring Entities and Suppliers		0	0	1	0	0	ZPPA; MoFNIP CSOs; ACC; DEC; MPSAs	300,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)	
				2023	2024	2025	2026	2027			2028
2.4. Enhance Integrity, Transparency and Accountability in the Provision of Public Services.		Entities and Suppliers in Place									
	Conduct Regular Targeted Audits under Public Procurement	No. of Audits Conducted		4	4	4	4	4	4	OAG; ZPPA; MoFNP; CSOs	2,000,000
	Undertake Social Audits on Public Procurement	No. of Social Audits by Civil Societies on Public Procurement Undertaken		4	4	4	4	4	4	CSOs; Media; ZPPA; MoFNP	3,000,000
	Conduct Stakeholders' Awareness on Transparent and Accountable Public Procurement	No. of Stakeholders' Engagements and Education on Transparent and Accountable Public Procurement Held		4	4	4	4	4	4	ZPPA; OAG; CSOs; ACC, MoJ; LEA's	2,000,000
	Develop and Establish Service Delivery Charters	Proportion of Additional Institutions with Service Delivery Charters		0.25	0.30	0.35	0.40	0.45	0.45	OPP; MDD; ACC; MPSAs; CSO's; Private Sector	1,600,000
	Monitor the implementation of the public service delivery charters	No. of public institutions service delivery charters Monitored		0	10	10	10	10	10	OPP; MDD; ACC; MPSAs; CSO's; Private Sector	350,000
	Establish feedback mechanisms on complaints handling	Proportion of institutions with feedback mechanisms on complaints Established		30%	35%	40%	45%	50%	50%	OPP; MDD; ACC; MPSAs; CSO's; Private Sector	1,600,000
	Train Journalists in Investigative Journalism on Public Sector Accountability and Anti-Corruption	No. of Training Sessions Conducted		10	10	10	0	10	10	ACC; OPP; CSOs; MoHAIS; DEC; OAG; FIC; Judiciary; ZPS; ZAMCOM; MoIM	7,000,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)	
				2023	2024	2025	2026	2027			2028
	Create Awareness and Information Dissemination on Service Delivery Charters	No. of Awareness Activities and Information Dissemination on Service Delivery Charters Conducted		10	10	10	10	10	10	5,000,000	OPP; MDD; MoFNP; ACC; MoIM; MPSAs; CSOs; Private Sector; Media
	Undertake Social Accountability in Selected Public Services	No. of Social Audits Undertaken (Public Expenditure Tracking; Alternative Reporting; Report Cards and Community Score Cards Conducted)		10	10	10	10	10	10	5,000,000	CSOs; Media; FBOs; NAZ; Chiefs MoCDSS; ACC; OPP; HRC
2.5. Promote Meritocracy and Transparency in Appointments and Promotions under the Public Service	Review, Develop and Implement a Competitive Competency and Merit Assessment System for Entry and Promotions in the Service Commissions.	Competency and Merit Assessment System for Entry and Promotions in Service Commissions Developed and Implemented.		0	1	0	0	0	0	500,000	Cabinet Office; NIPA; Service Commissions; NAZ; OPP; MPSAs
	Sensitise Relevant Officers and Service Commissions on Accountability and Anti-Corruption in Recruitment, Placements and Promotion	No. of Sensitisation Meetings Conducted No. of Public Officers Sensitised		40	40	40	40	40	40	1,000,000	Cabinet Office; OPP; ACC; PSMD; Service Commissions; CSOs; NAZ
2.6. Enhance Transparency and Accountability in the	Establish and Support use of an Integrated Online Recruitments to Public Office	Integrated Online Platforms for Recruitments to Public Office Implemented		0	1	1	1	1	1	2,000,000	Cabinet Office; SMART-Zambia; Service Commissions; MPSAs; OPP
	Conduct Land and Natural Resources Audits	No. of Land Audits Conducted		0	1	1	0	0	0	5,000,000	MoLINR; MoGEE; MoMMD; Ministry of Tourism; EITI; MoLGRD; CSOs; NAZ

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)		
				2023	2024	2025	2026	2027			2028	
Management of Natural Resources		No. of Forestry Audits Conducted		0	0	0	1	0	0	0	MoGEE; OAG; Ministry of Tourism; EITI; MoLGRD; CSOs; NAZ	3,000,000
		No. of Minerals Audits Conducted		0	0	1	0	0	0	0	MoMMD; OAG; EITI; MoLGRD; CSOs	5,000,000
		No. of Transparent and Accountable Mechanism for Granting of Operating Licences/Permits Established		0	1	0	0	0	0	0	MoLNR; MoGEE; MoMMD; Ministry of Tourism; EITI; MoLGRD; Cabinet Office; House of Chiefs; CSOs	1,000,000
	Establish Mechanisms that Promote Transparency in the Issuance Operating Licences/Permits-Mining, Wildlife, Forestry, Lands, and Water	Proportion of Lands Tribunals Established in all 10 provinces.		0	1	1	1	1	1	1	MoLNR; MoGEE; MoMMD; Ministry of Tourism; EITI; MoLGRD; House of Chiefs; CSOs	1,500,000
	Raise Awareness on Communities' Accountability and Anti-Corruption Actions in Natural Resources	No. of Communities Sensitised		40	40	40	40	40	40	40	ACC; CSOs; MoLNR; Ministry of Tourism; MoMMD; MoWDS; House of Chiefs; MoLGRD	5,000,000
	Engage Traditional Leadership on Anti-Corruption and Accountability in the Management of Natural Resources	No. of Engagements Held Annually		20	20	20	20	20	20	20	ACC; CSOs; MoLNR; MoMMD; MoGEE; Ministry of Tourism; House of Chiefs; MoLGRD	4,000,000
Policy Objective 3: To Strengthen Institutional Capacities of Anti-Corruption Bodies in Investigations and Prosecution of Corruption and Related Crimes												
3.1. Enhance the Human Capacities of Anti-Corruption Commission and other Law Enforcement Agencies to Prevent,	Revise Training Curricula for Officers on Countering Corruption and associated Economic Crimes	Training Curricular Revised		0	1	0	0	0	0	0	ACC; NPA; DEC; NPA; FIC; ZPS; Judiciary; Cabinet Office; DOIM	500,000
	Develop Training Manuals and Guidelines for Officers	Training Manuals and Guidelines Developed		0	2	0	0	0	0	0	Cabinet Office; NPA; ACC; DEC; ZPS; Judiciary; TEVET; FIC	1,000,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)		
				2023	2024	2025	2026	2027			2028	
Investigate and Prosecute Corruption	Undertake Specialised Training for Investigators and Prosecutors Involved in Anti-Corruption, Asset Recovery and Related Crimes	No. of Trainings Conducted No of officers trained		10	10	10	10	10	10	Cabinet Office; ACC; FIC; NPA; DEC; ZPS; MoFAIC	2,000,000	
	Undertake Specialised Training in Corruption Prevention for all officers.	No of officers trained		10	10	10	10	10	10	Cabinet Office; ACC; NPA; DEC; ZPS; MoFAIC; FIC	2,000,000	
	Undertake Training in Anti-Corruption Public Education and Engagement for all officers.	No of officers trained		10	10	10	10	10	10	Cabinet Office; ACC; NPA; DEC; ZPS; MoFAIC; FIC	2,000,000	
	Establish a Centre for In-Service Training on Anti-Corruption, Cyber and Economic Crimes	Training Centre Established			1						NPA; DEC; FIC; ACC; Cabinet Office; NIPA; MoFNP; CPs	5,000,000
	Provide In-Serve Training for Officers Involved in Anti-Corruption, Asset Recovery and Related Crimes	No. of Officers Attending In-Serve Programmes		20	20	20	20	20	20	20	Cabinet Office; NPA; ACC; DEC; ZPS; MoHAs;; CPs; MoJ; CSOs	3,000,000
	Facilitate Regional and International Exchange Visits	No of Regional and International exchange visits No. of Officers Participating in Exchange Visits		410	10	10	10	10	10	10	Cabinet Office; MoFAIC; Investigative Commissions; NPA; MoJ; MoHAIS	15,000,000
	Recruit Additional Personnel in the ACC and other Relevant Agencies	Proportion of Personnel in LEAS and other Relevant Agencies Recruited against Establishment		0.1	0.2	0.3	0.5	0.8	0.8	0.8	ACC; DEC; ZPS; OPP; ZPS; Cabinet Office; MoFNP	5,000,000
	Establish ACC offices and other collaborating LEAs in all Provinces and Districts	Proportion of ACC offices and other collaborating LEAs established in all		0.1	0.2	0.3	0.5	0.8	0.8	0.8	ACC; OPP; DEC; NPA; Cabinet Office; MoFNP; MoHAIS; Judiciary	60,000,000
	3.2. Enhance Institutional Capacity of the Anti-Corruption Commission and other Law Enforcement Agencies Involved in Fighting Corruption.											

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)
				2023	2024	2025	2026	2027		
		Provinces and Districts								
	Progressively Decentralise Selected Functions/Activities of the Anti-Corruption Commission to Provincial and District Offices	Proportion of provinces and districts with devolved Functions/Activities of the Anti-Corruption Commission.		0.1	0.2	0.3	0.5	0.8		15,000,000
	Expand the Organisational Structures of the Anti-Corruption Commission and other relevant LEAs.	Organisational Establishment Expanded		0.1	0.2	0.3	0.5	0.8		60,000,000
	Train officers in Capturing and Analysing of Intelligence Data on Corruption	No. of officers Trained		40	40	40	40	40		2,000,000
	Establish an Integrated Government-Wide Electronic Case Management System.	Government-Wide Integrated Case-Flow Management System in Established		0	0	1	0	0		9,000,000
3.3. Enhance the Capacity of Courts of Law in Handling Corruption, Financial and Economic Crimes Cases	Expand Automated Case and Records Management System	Case Record Management System Expanded		0	1	0	0	0		2,000,000
	Decentralise the High Court to all Provinces in line with the Constitution	Proportion of Provinces with High Courts		0	0	1	0	0		2,000,000
	Capacity Building of Judges and Judicial Officers in Anti-	No. of Provincial Training Sessions Conducted.		10	10	10	10	10		5,000,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)			
				2023	2024	2025	2026	2027			2028		
3.4. Enhance Recovery, Management and Disposal of Assets.	Corruption, Financial and Economic Crimes	No. of Judges, judicial officers trained											
	Establish a Centre for Judicial In-service Training	Judicial Training Centre Established		0	1	0	0	0		Judiciary; MoJ; MoFNP; Cabinet Office; MoIHUD; CSOs	20,000,000		
	Establish a Single National Repository for Seized and Forfeited Assets	National Repository for Seized and Confiscated Assets Established		0	1	0	0	0		NPA; MoJ; MoFNP; Cabinet Office; Investigative Commissions; MoHIS; MoFAID; CSOs	3,000,000		
	Train Officers Involved in Asset Recovery (Tracing, Freezing and Forfeiture)	No. of Officers Trained in Asset Recovery (Tracing, Freezing and Forfeiture)		30	30	30	30	30	30		Cabinet Office; NPA; Investigative Commissions; MoFNP; MoJ; CSOs	4,000,000	
	Create Public Awareness on Asset Recovery	No. of Sensitisation Activities Undertaken on Asset Recovery		10	10	10	10	10	10		NPA; DEC; ACC; FIC; OAG; BOZ; ZPS; MoJ; CSOs; Media; MPAs	3,000,000	
4.1. Enhance Knowledge Levels on Corruption Amongst Learners and Young Persons.	Undertake International Cooperation and Mutual Legal Assistance on Asset Recovery	No. of Engagements Undertaken		5	5	5	5	5		MOJ; MoFAIC; NPA; MoHAIS; MoFNP; ACC; DEC; ZPS; FIC	20,000,000		
	Policy Objective 4: To Promote Mind-Set and Behavioural Change Amongst the General Public Against Corruption												
	Revise and Integrate Anti-Corruption, Integrity and national values into the Education Curricula at all Levels	Education Curricula at all Levels Revised and Integrate with Anti-Corruption, Integrity and national values		1	1	1	1	1	1	0		MoGE; OVP; ACC; CDC; OPP; DEC; CSOs	2,000,000
				150	300	300	300	300	300	300	300		ACC, MoE; TSC, OVP; CDC; OPP; CSOs; TEVEITA
			300	300	300	300	300	300	300	300		MoYSA; ACC; NIPA; NAZ; MoJ; CSOs; Media	3,000,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)
				2023	2024	2025	2026	2027		
	Integrity, national values and Accountability									
	Hold Community Discussions on Anti-Corruption and Civic Empowerment for Young People	No. of Community Discussions Held		20	20	20	20	20		4,000,000
	Establish Platforms on Good Governance, Accountability and Anti-Corruption for Leaders	No. of Platforms on Good Governance Established		120	130	140	150	160		2,000,000
4.2. Enhance Knowledge Levels and Action on Anti-Corruption, Accountability and Transparency in Communities.	Develop and Disseminate Anti-Corruption and Civic Awareness IEC Materials	No. Anti-Corruption and Civic Awareness IEC Materials Developed and Disseminated		100000	100000	100000	200000	100000		1,500,000
	Undertake Community Engagements on Public Sector Accountability and Anti-Corruption	No. of Community Engagement Meetings Held		10	10	10	10	10		5,000,000
	Hold Community Media Engagements on National Values and Public Sector Accountability	No. of Community Media Engagements Held on National Values and Public Sector Accountability		10	10	10	10	10		3,500,000
	Engagements With Traditional Leadership On Community Mobilisation for Integrity and Anti-Corruption	No. of Engagements With Traditional Leaders on Community Mobilisation Held		10	10	10	10	10		5,000,000
	Hold Engagement meetings With Traditional Leaders On Anti-corruption and	No. of engagements with traditional leaders on traditional /		10	10	10	10	10		5,000,000

Measures	Activities	Output Indicators	Base Year 2023	Targets					Responsible Agency	Estimated Costs (ZMW)
				2024	2025	2026	2027	2028		
	Traditional / Cultural Practices	cultural practices that promote corruption (1 per province) No. of traditional leaders engaged								
	Undertake sensitisation and awareness activities on Corruption during traditional ceremonies	No. of sensitisation and awareness activities on Corruption during traditional ceremonies		20	20	20	20	20	ACC; House of Chiefs; CSOs; Faith-Based; Organisations Media	1,000,000
	Hold Commemorative Events on Anti-Corruption	No. of Events Held		1	2	2	2	2	Cabinet Office; ACC; OPP; MoJ; MPSAs; CSOs	10,000,000
	Hold Annual Provincial Governance Forums	No. of Annual Provincial Governance Forums Held		3	3	3	3	3	MoJ; ACC; OPP; MLGRD; Faith based organisations; Media; Academia; CSOs	1,500,000
	Hold National Anti-Corruption Conferences, Symposia and Summits	No. of National Anti-Corruption Conference, Symposiums, and Summits Held		5	5	5	5	5	Cabinet Office; ACC; OPP; NPA; ZPS; FIC; Judiciary; MoJ; MPSAs; CSOs; Media; FBOs	10,000,000
	Conduct a Study on Gender, Accountability and Corruption	Study on Gender, Accountability and Corruption Conducted		0	1	0	0	0	ACC; Cabinet Office / Gender Division; CSOs	800,000
4.3. Promote Gender Responsive Anti-Corruption Empowerment Interventions.	Create Gender Inclusive Platforms on Anti-Corruption and Public Sector Accountability	No. of Gender Inclusive Anti-Corruption and Accountability Platforms created		2	2	2	2	2	CSOs; ACC; Cabinet Office / Gender Division; OPP	2,000,000
	Create Awareness and Sensitisation on Corruption and Gender	No. of Awareness and Sensitisation Activities Undertaken		10	15	20	20	20	ACC; Cabinet Office / Gender Division; CSOs; Media	1,750,000
Policy Objective 5: To Strengthen The Anti-Corruption Legal Framework										
5.1. Review, Harmonise and Enact Relevant Legislation on the	Harmonise and Consolidate Relevant Laws on Anti-	Relevant Laws Identified and Harmonised								
					1					ZLDC; ACC; NPA; OPP; LEAs; FIC; MoJ; Cabinet Office; NAZ; Judiciary

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)	
				2023	2024	2025	2026	2027			2028
Fight Against Corruption and Associated Crimes.	Corruption and Related Crimes										
	Review and Amend the Public Interest Disclosure (Protection of Whistleblowers) Act, 2010	The Public Interest Disclosure (Protection of Whistleblowers) Act, 2010 Reviewed and Amended		0	0	1	0	0	0	1,000,000	
	Undertake Revision of Legislation on Witness Protection	Legislation on Witness Protection Revised		0	1	0	0	0	0	1,000,000	
	Review the Forfeiture of Proceeds of Crime Legislation	The Forfeiture of Proceeds of Crime Act, 2010 Revised	0	0	0	1	0	0	0	500,000	
	Develop Guidelines/Regulations for Transparent and Accountable Management and Disposal of Forfeited Assets	Guidelines on Management and Disposal of Forfeited Assets Developed		0	1	0	0	0	0	400,000	
	Enact Constitutional Legislation on Declaration of Assets and Liabilities by Persons Holding Public Office	Consequential Legislation Enacted		0	0	1	0	0	0	1,000,000	
	Enact Constitutional Legislation on Code of Conduct and Ethics	Constitutional consequential legislation on Public Service Code of Conduct and Ethics enacted		0	0	1	0	0	0	600,000	
	Amend the Law on Out of Court Settlements to Enhance Accountability and Transparency	Legal Provisions on out of Court Settlements Amended		0	1	0	0	0	0	300,000	

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)	
				2023	2024	2025	2026	2027			2028
	Enact Legislation on Access to Information	Legislation on Access to Information Enacted		0	1	0	0	0	0	1,000,000	MoIM; MoHAIS; MoJ; NAZ; Cabinet Office; FBOs; CSOs; Media
	Conduct training sessions for various stakeholders on the process and procedure of accessing information.	No. of Training Sessions on the process and procedure of accessing information conducted		10	10	10	10	10	10	5,250,000	MoIM; MoHAIS; HRC; OPP; MoJ; NAZ; FBOs; CSOs; Media
	Conduct public awareness on ATI law	No. of awareness activities on ATI law conducted		0	10	10	10	10	10	3000,000	MoIM; MoHAIS; MoJ; NAZ; CSOs; Media, HRC, MPSAs
	Enact a law to monitor Political Party Financing	Law to monitor Political Party Financing enacted		0	1	0	0	0	0	3,500,000	OVP; Investigative Bodies; Registrar of Societies; ZCID; MoHAIS; National Assembly; Judiciary; MoJ; CSOs,
5.2. Adopt and Domestic Regional and International Instruments for Preventing and Combating Corruption.	Domesticate Relevant Regional and International Instruments for Combating Corruption	Proportions of provisions of Regional and International Instruments which Zambia is a part to domesticated		30%	40%	50%	60%	60%	60%	1,000,000	MoFAIC; MoJ; Cabinet Office; MoHAIS; NPA; Judiciary; ACC; DEC; OPP; FIC; NAZ; ZPS; CSOs
	Facilitate Country Implementation Reviews of Regional and International Instruments on Anti-Corruption and Associated Crimes.	No. of Country Implementation Reviews Facilitated.		2	0	0	0	0	1	1,000,000	MoFAIC; MoJ; Cabinet Office; MoHAIS; ACC; DEC; OPP; FIC; NPA; Judiciary; ZPS; CSOs
	Review Anti-Corruption Mechanisms on International Cooperation and Legal Mutual Assistance and Asset Recovery.	Mechanisms on International Cooperation, Legal Mutual Assistance and Asset Recovery Reviewed.		0	1	0	0	0	0	200,000	NPA; MoJ; MoFAIC; Cabinet Office; MoHAIS; ACC; DEC; OPP; FIC; NAZ; ZPS; Judiciary; CSOs; CPs
	Monitor Compliance to International Anti-Corruption Obligations	Compliance to International and Regional Anti-		1	0	1	0	0	1	200,000	MoFAIC; MoJ; Cabinet Office; MoHAIS; ACC; DEC;

Measures	Activities	Output Indicators	Base Year 2023	Targets					Responsible Agency	Estimated Costs (ZMW)
				2024	2025	2026	2027	2028		
		Corruption Obligations Monitored							OPP; Judiciary; FIC; CSOs; CPs	
	Facilitate Affiliation of Establishment of Regional and International Anti-Corruption Partnerships	No. of Regional and International anti-corruption Partnerships Established	0	2	2	2	2	2	MoFAIC; Cabinet Office; MoHAIS; NPA; ACC; DEC; OPP; FIC; MPSAs; ZPS; Judiciary; MoJ; NAZ; CSOs	1,500,000
Policy Objective 6: To Strengthen Co-ordination, Partnerships, Collaboration, Monitoring, Evaluation and Research on Anti-Corruption										
	Map-Out Relevant Stakeholders Involved in Anti-Corruption and Promotion of Accountability at National and Provincial levels.	No. of Stakeholders Identified.	1	0	0	0	0	0	ACC; MoJ; Cabinet Office; OPP; NPA; DEC; ZPS; FIC; Judiciary; Private Sector; CSOs; Media	750,000
6.1. Enhance Institutional Capacities to Coordinate Implementation of the Policy	Constitute and Establish a National Inter-Agency Policy Coordinating/Steering and Reporting Structure.	National Inter-Agency Policy Coordination/Steering Structure in Place.	1	0	0	0	0	0	Cabinet Office; MoJ; MoHAIS; NPA; ACC; Judiciary; MoFAIC; NAZ; DEC; OPP; OAG; FIC; Private Sector; CSOs	2,000,000
	Create a National Oversight Mechanism on the Implementation of the Policy.	National Oversight Mechanism on the Policy Established.	1	0	0	0	0	0	Cabinet; Cabinet Office (PAC); MoJ; ACC; OPP	200,000
	Constitute and Establish Technical Working Committees on the Implementation of the Policy.	No. of Relevant Technical Committees Established and Operational.	100%	3	3	3	3	3	ACC; Cabinet Office; OPP; DEC; FIC; MoJ; NPA; NAZ; ZPS; OAG; MPSAs; Private Sector; CSOs	2,500,000
	Conduct training for Secretariat in Anti-Corruption Policy, Planning, Coordinating and Reporting.	Training of Officers Conducted.	0	1	0	0	0	0	Cabinet Office (PAC); ACC; CSOs; School of Government; Academia; CPs	600,000
6.2. Strengthen National and International Collaboration Amongst Law Enforcement	Mobilise and Promote Participation of Private Sector, Civil Society and Media.	No. of Private Sector and the Civil Society Participating in Anti-Corruption Activities and Media Forums.	3	3	3	3	3	3	ACC; MoJ; OPP; DEC; CSOs; Private Sector; Media	4,500,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)
				2023	2024	2025	2026	2027		
6.3. Strengthen Monitoring, Evaluation and Reporting Mechanisms.	Hold Annual Policy Review Meetings	No. of Annual Policy Review Meetings Held		10	10	10	10	10	10	4,000,000
	Constitute a National Policy Monitoring and Evaluation Committee.	National Policy Monitoring and Evaluation Committee Established.		1	0	0	0	0	0	2,000,000
	Develop the Monitoring and Evaluation Framework for the Policy Interventions.	Policy Monitoring and Evaluation Framework Developed and in Place.		1	0	0	0	0	0	500,000
6.4. Strengthen Research and Utilisation of Research Findings on Anti-Corruption.	Conduct Capacity Building in Policy Monitoring and Evaluation.	Capacity Building Conducted.		1	0	0	0	0	0	3000,000
	Planning, Monitoring, Evaluation and Reporting.	No. of Planning Meetings, Monitoring and Evaluation Conducted.		4	4	4	4	4	4	2,000,000
	Launch and Dissemination of the Policy.	Policy Launched and Disseminated		1	0	0	0	0	0	2,000,000
6.5. Resource Mobilisation And Financing.	Produce and Distribute Policy Briefs and Media Articles	Policy Briefs and Media Articles Produced and Distributed.		3	3	3	3	3	3	300,000
	Conduct Periodical Surveys on Corruption and State Accountability.	No. of Citizens Surveys on Corruption and State Accountability Undertaken.		1	0	0	1	0	1	2,000,000
	Undertake Research on Anti-Corruption and Public Accountability.	Research or Studies Conducted.		On-going	On-going	On-going	On-going	On-going	On-going	2,000,000
	Provide adequate Budgetary Resources Allocation to Anti-	% Increase in National Budget Allocation for Anti-Corruption and		5%	10%	15%	20%	25%		20,000

Measures	Activities	Output Indicators	Base Year	Targets					Responsible Agency	Estimated Costs (ZMW)
				2023	2024	2025	2026	2027		
	Corruption and State Accountability.	Public Sector Accountability Activities.								
	Engage Local and International Development Partners for Resource Mobilisation and Support.	No. of Development Partners Engaged.		5	5	5	5	5	5	4000,000
	GRAND TOTAL									ZMW 620,520,000

