

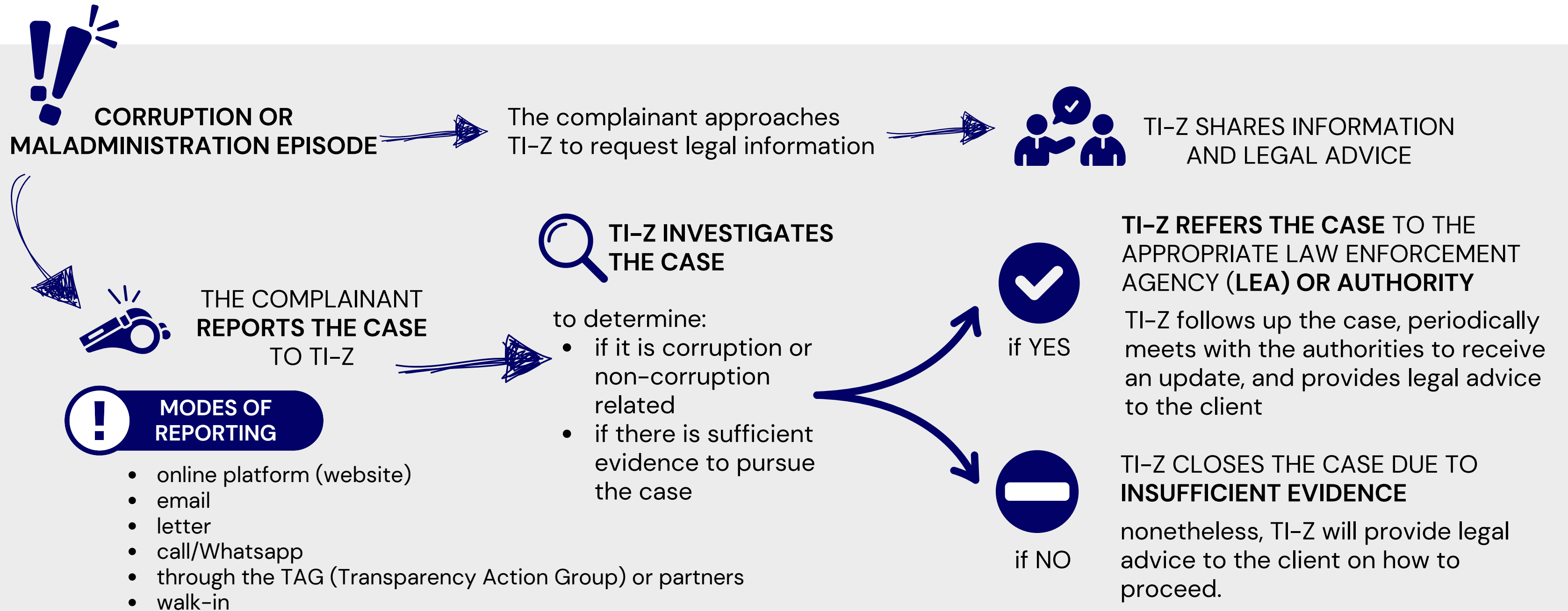


ALAC 2024

TRENDS - INFOGRAPHICS

ADVOCACY AND LEGAL ADVICE FOR CITIZENS

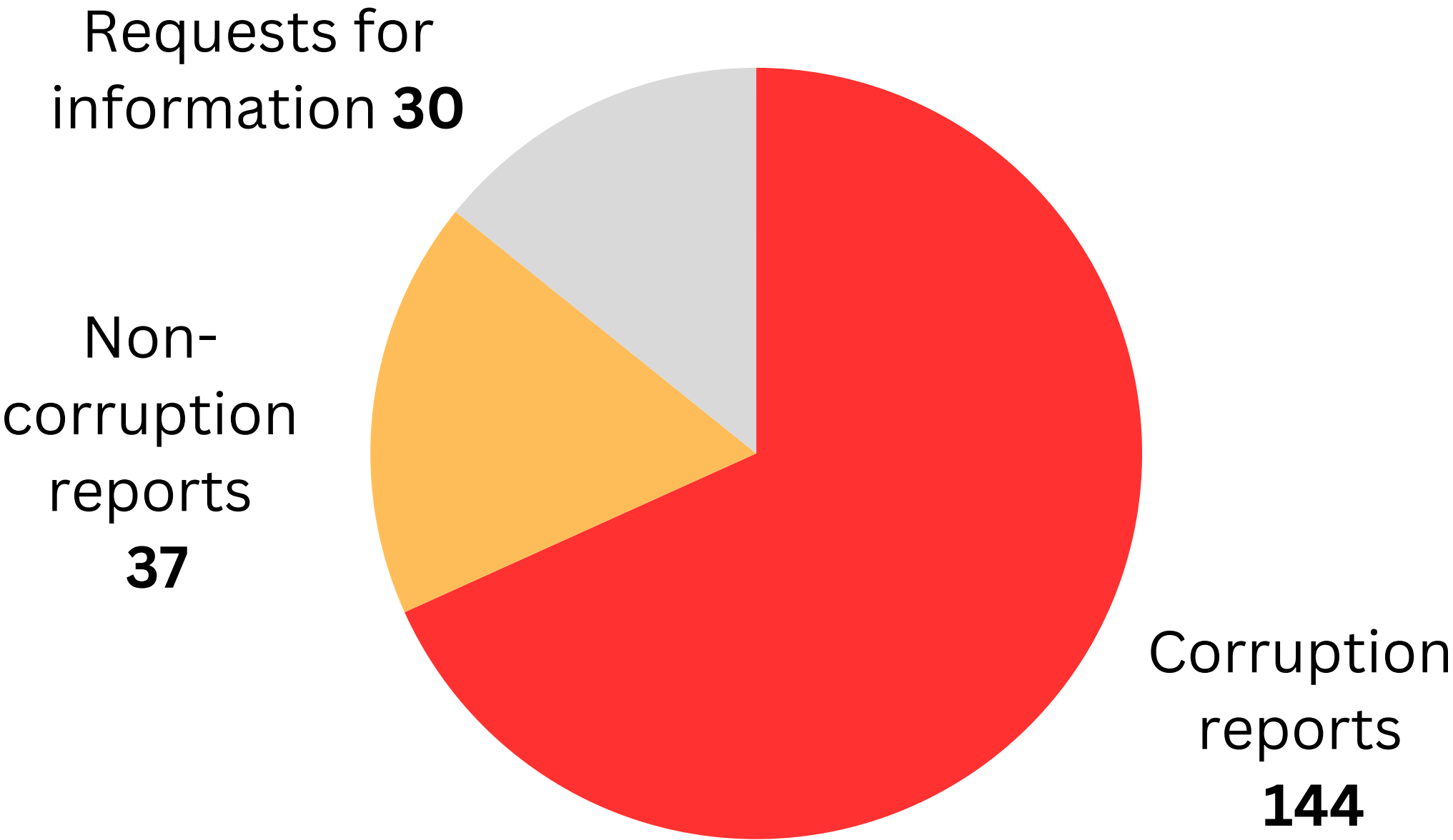
The process of reporting corruption to TI-Z



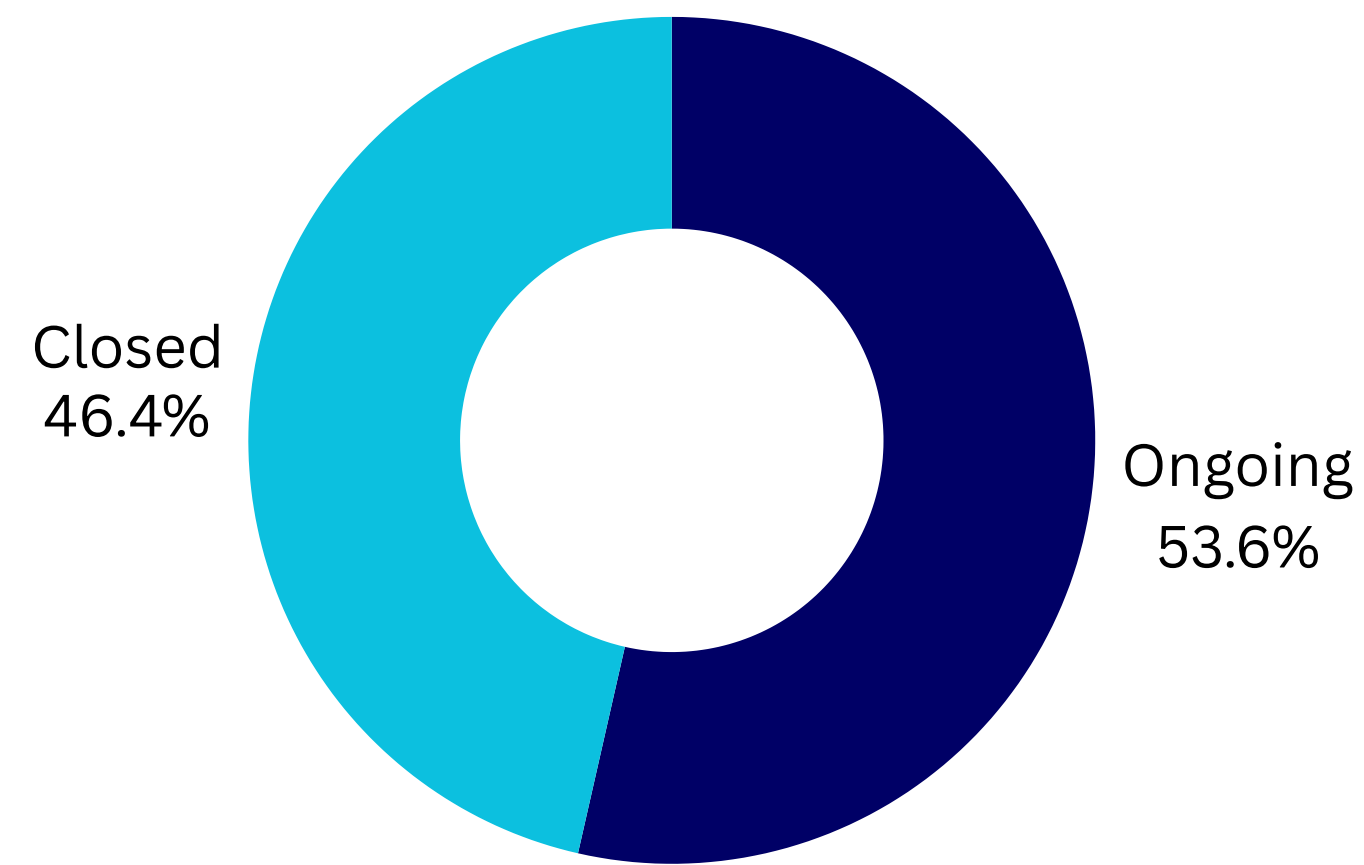
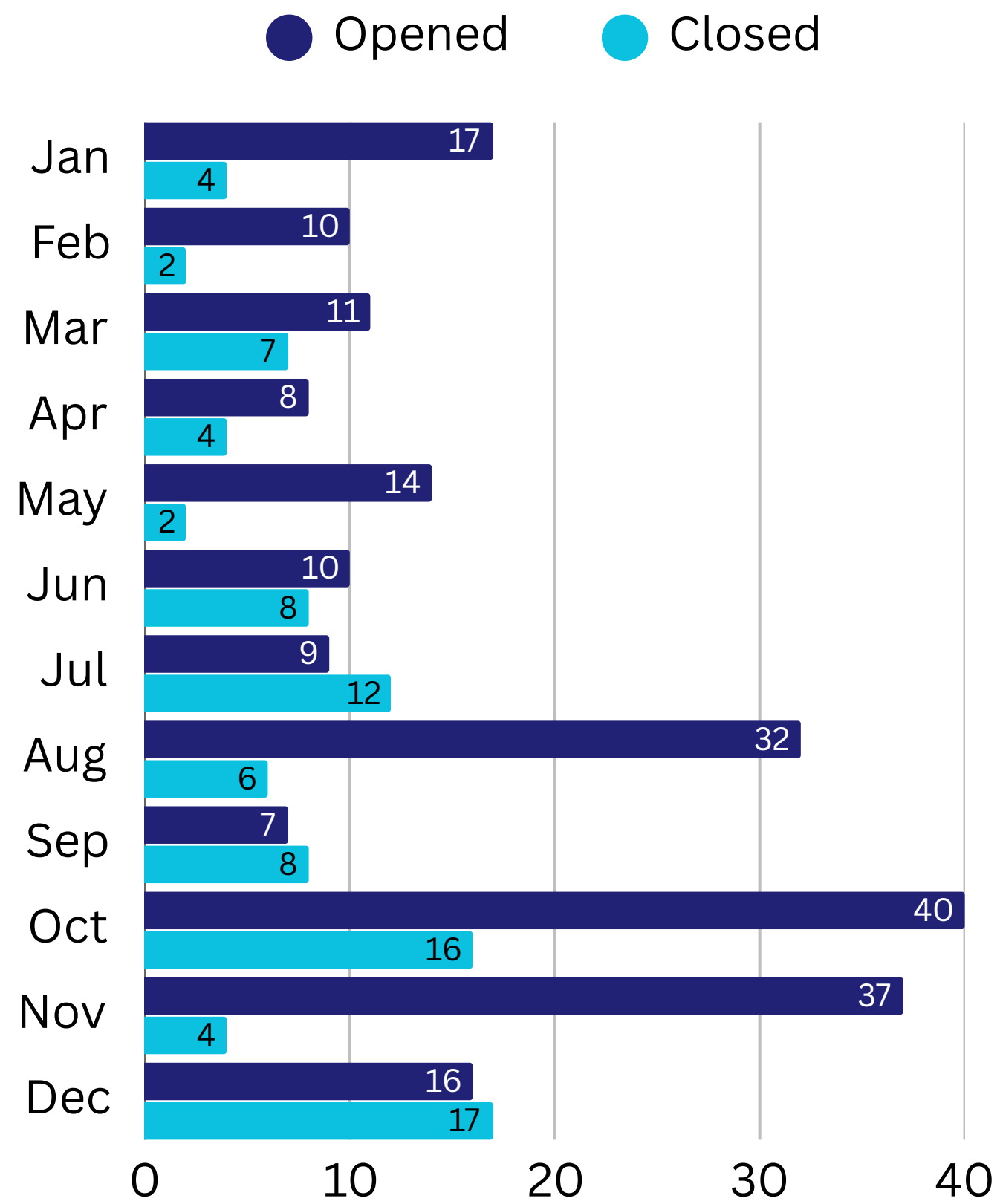
ALAC: Advocacy and Legal Advice for Citizens Centre

Complaints received

211: total number of reports opened in 2024 under ALAC

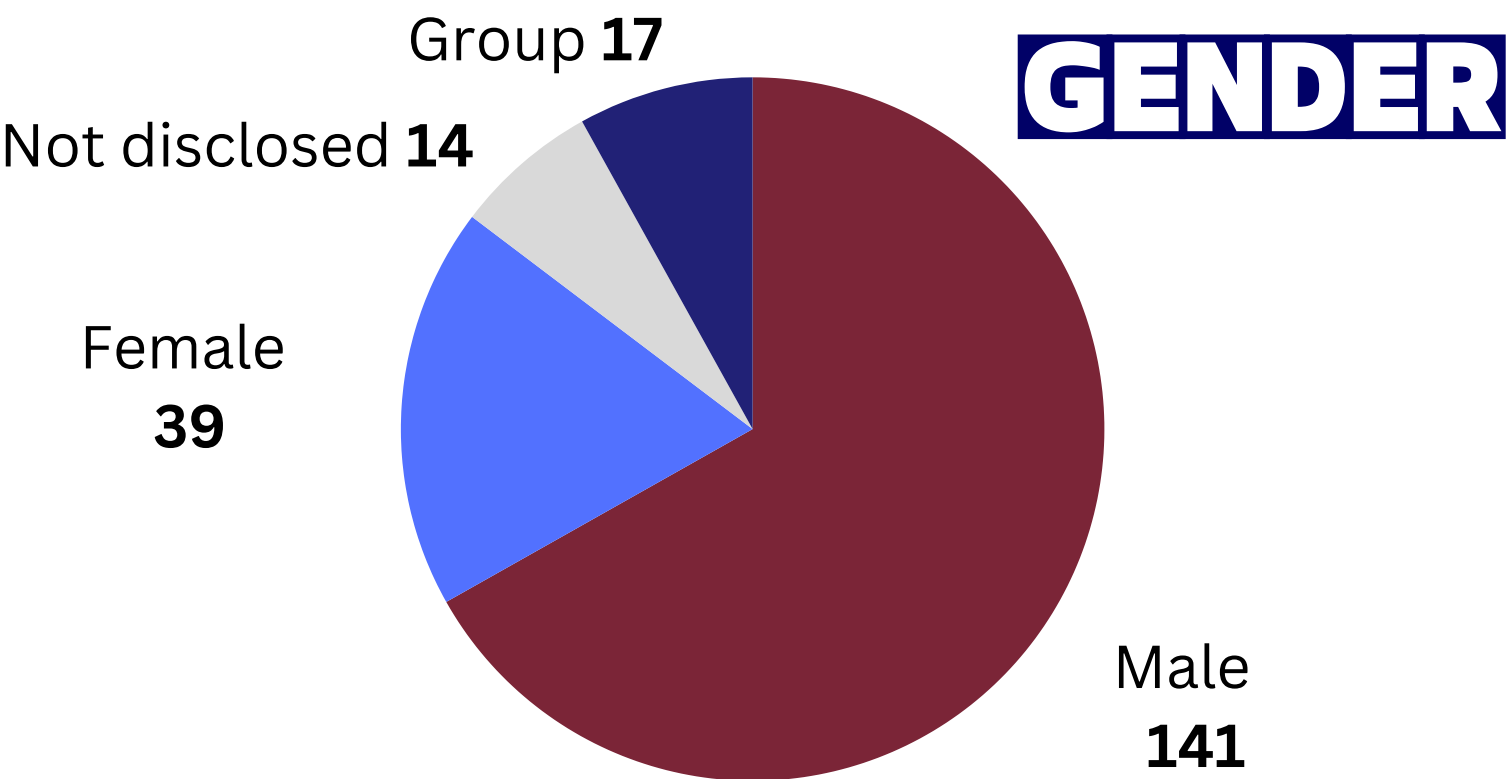


Open and Closed Reports as of Feb. 2025

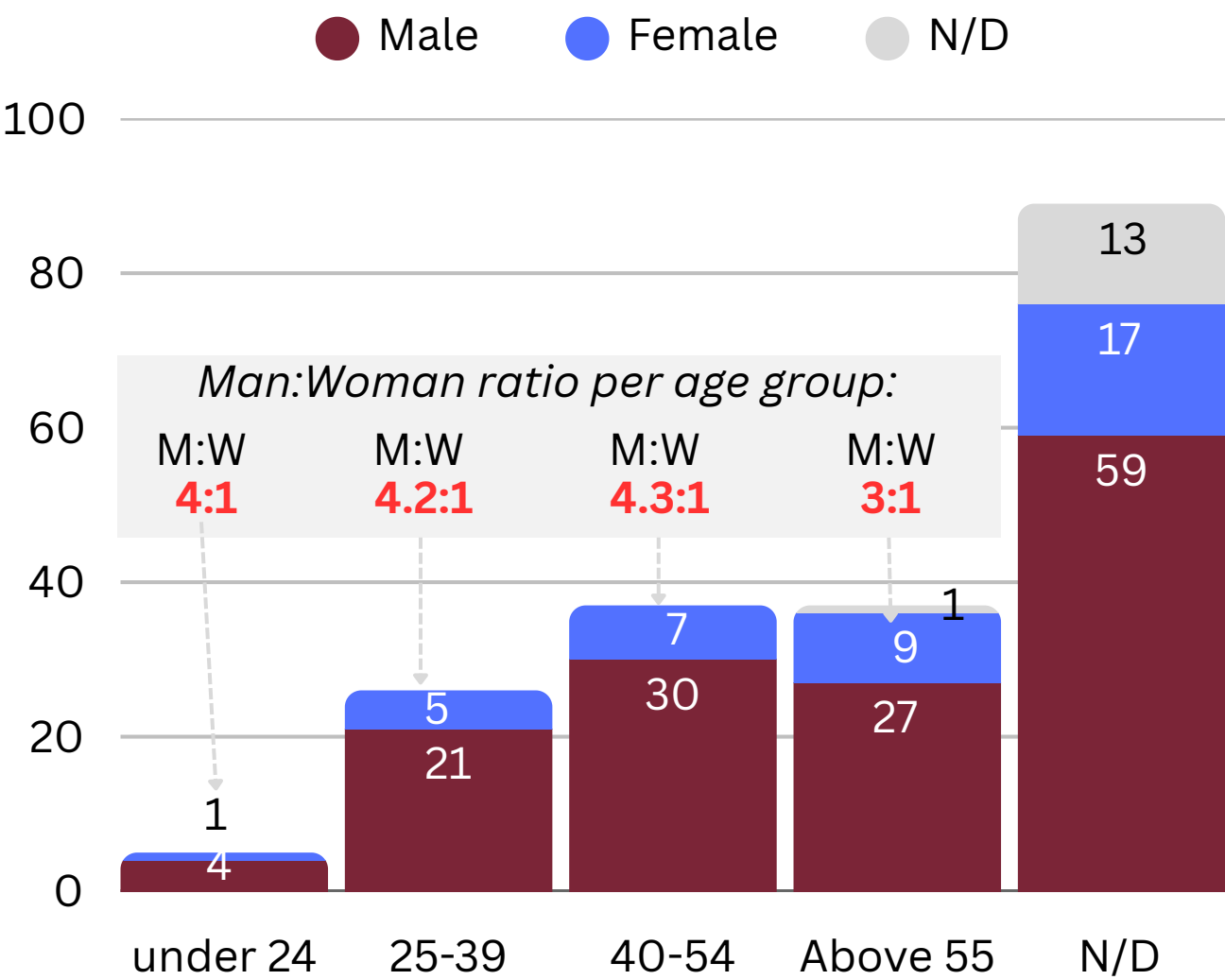
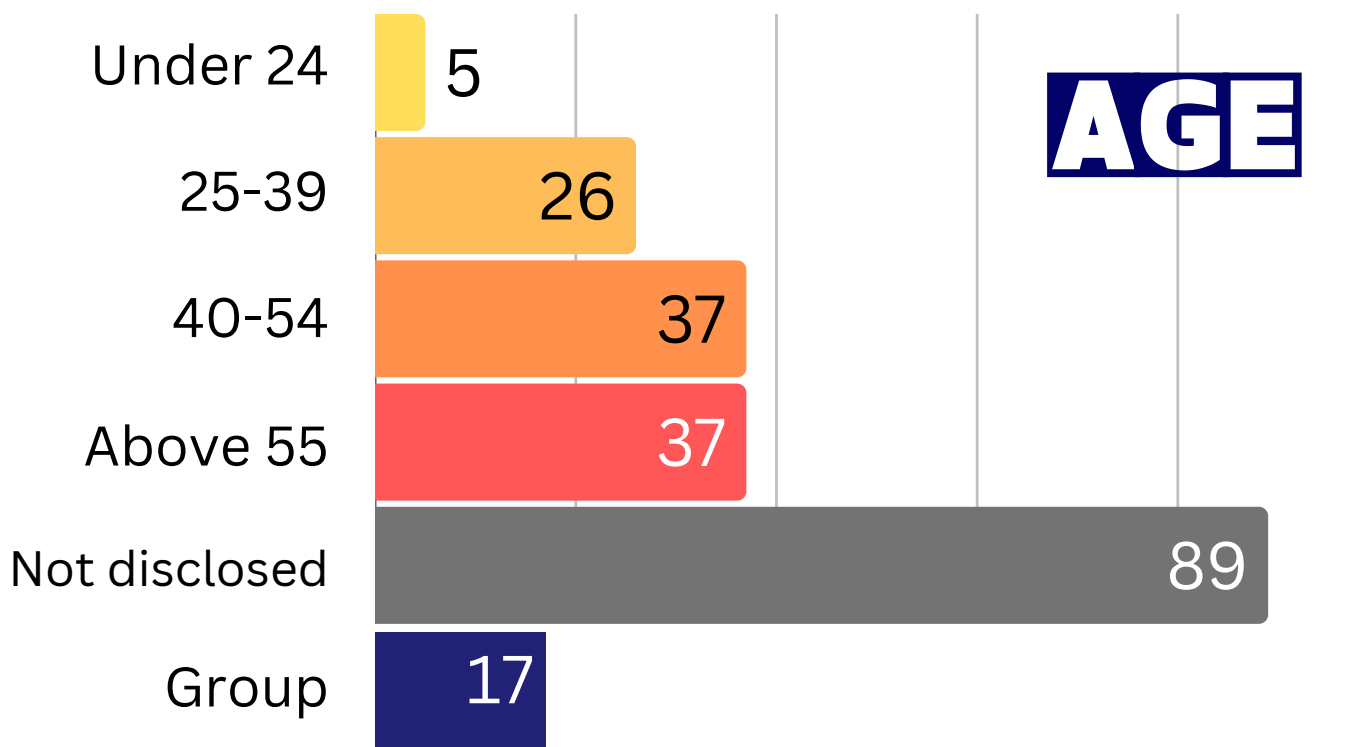


Ongoing (or open) reports are being handled by TI-Z, and closed when the involvement of TI-Z is finished. Reports are **closed** when TI-Z’s involvment comes to an end. *After a case is referred to a LEA and said LEA has provided feedback that it has actively begun investigating a case, TI-Z considers its involvement finished, hence closing the case (even when the case is still being handled by the LEA). Instead, referred cases where the feedback from LEAs or authorities is still due are considered open for the purpose of this report.*

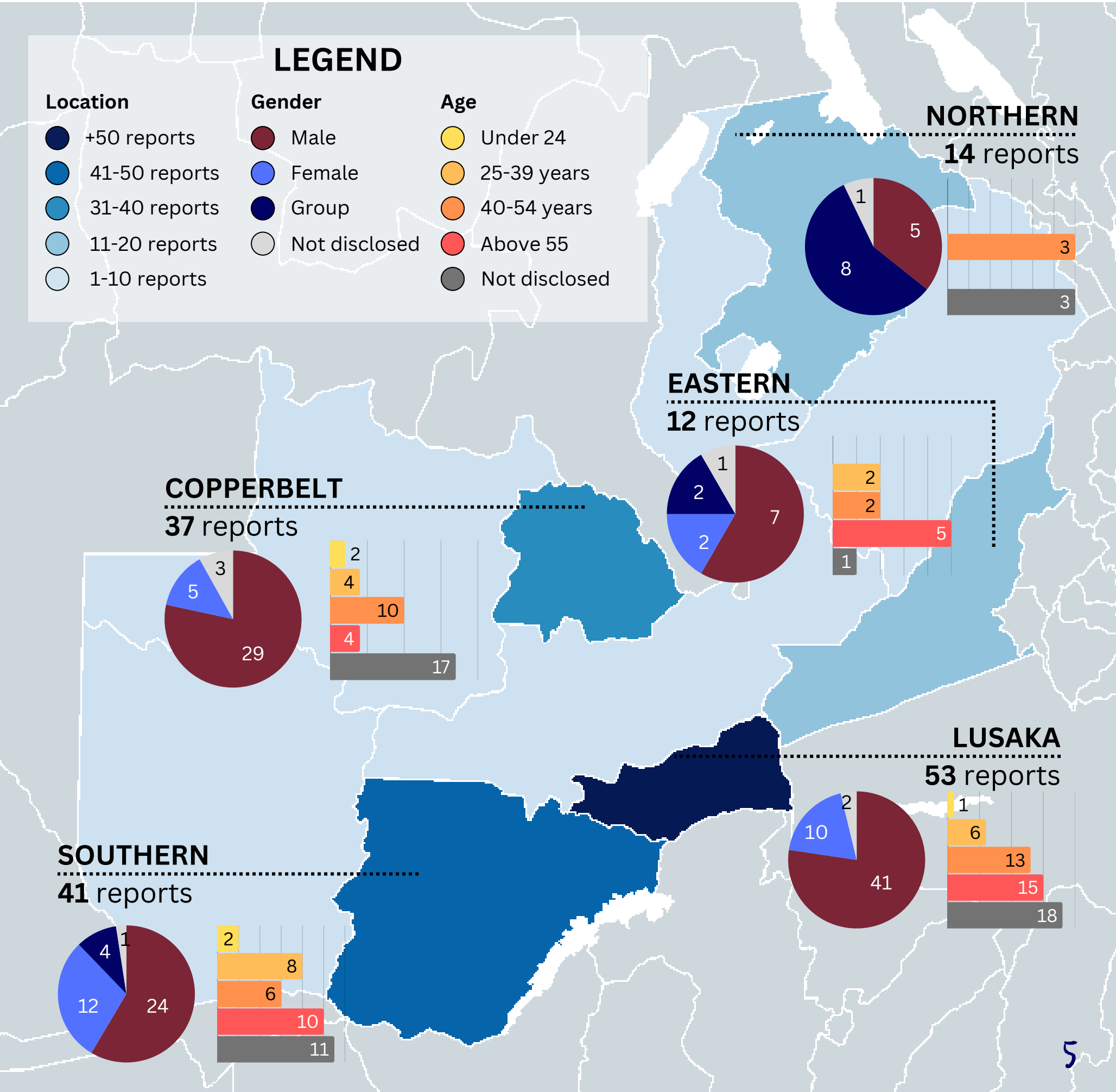
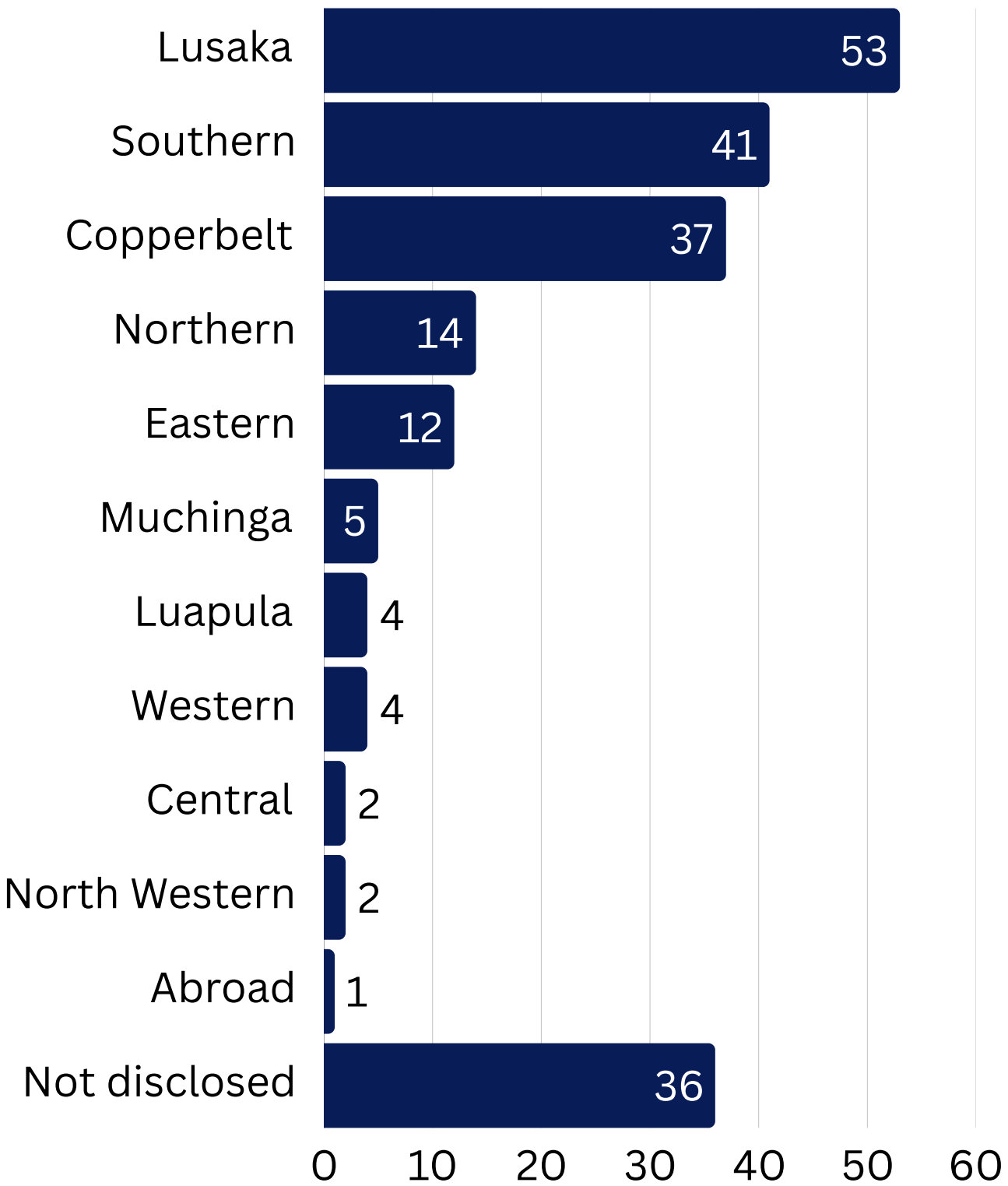
Age and Gender of complainants



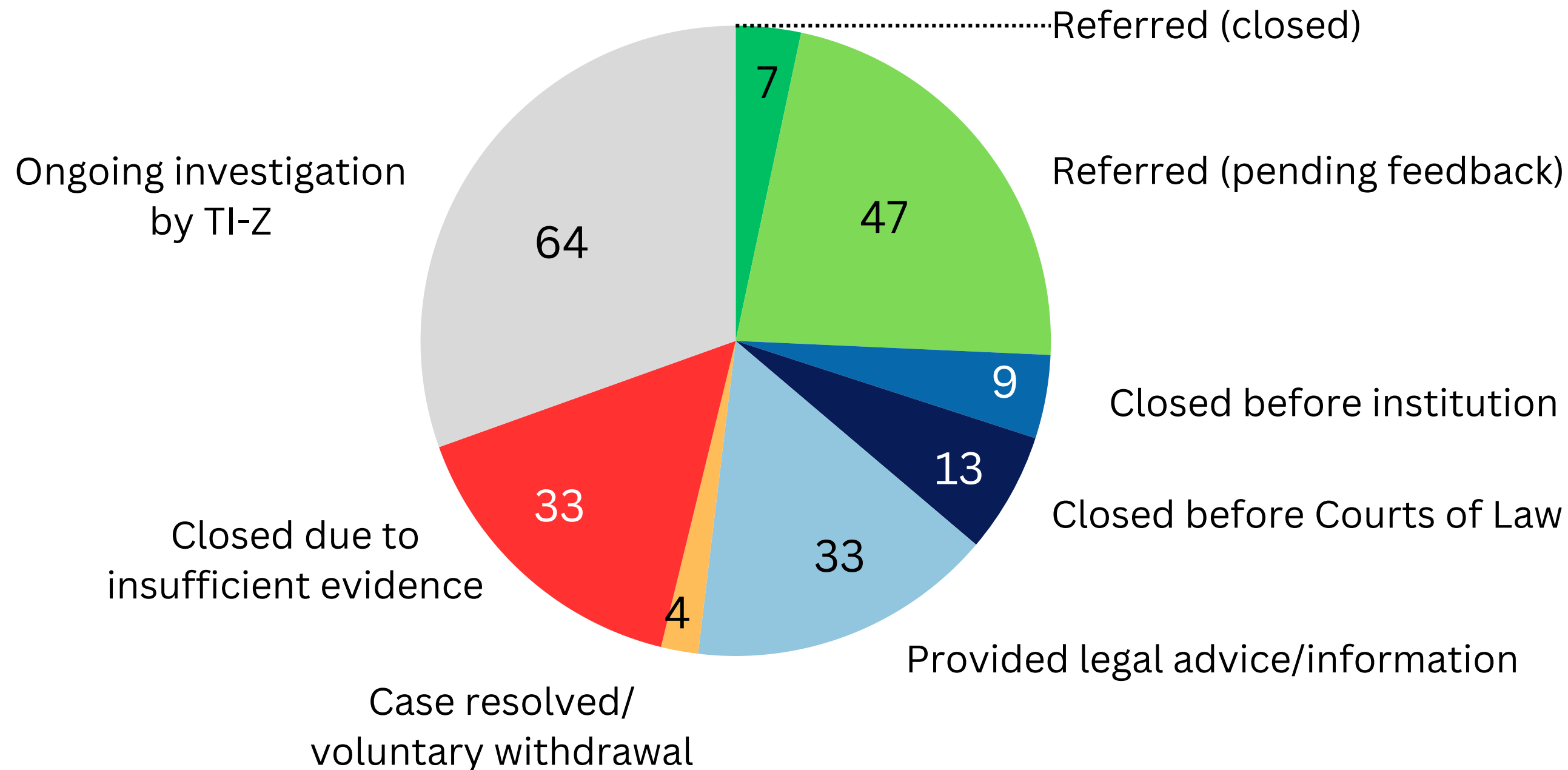
- 67% of complainants are men compared to 19% who are women
- TI-Z received twice as many reports from older complainants (above 40 years) than from younger ones (under 24)
- The gender gap decreases for the oldest age group (i.e., above 55)
- Most complaints came from Lusaka, Southern province and Copperbelt (next page)



Location of complainants

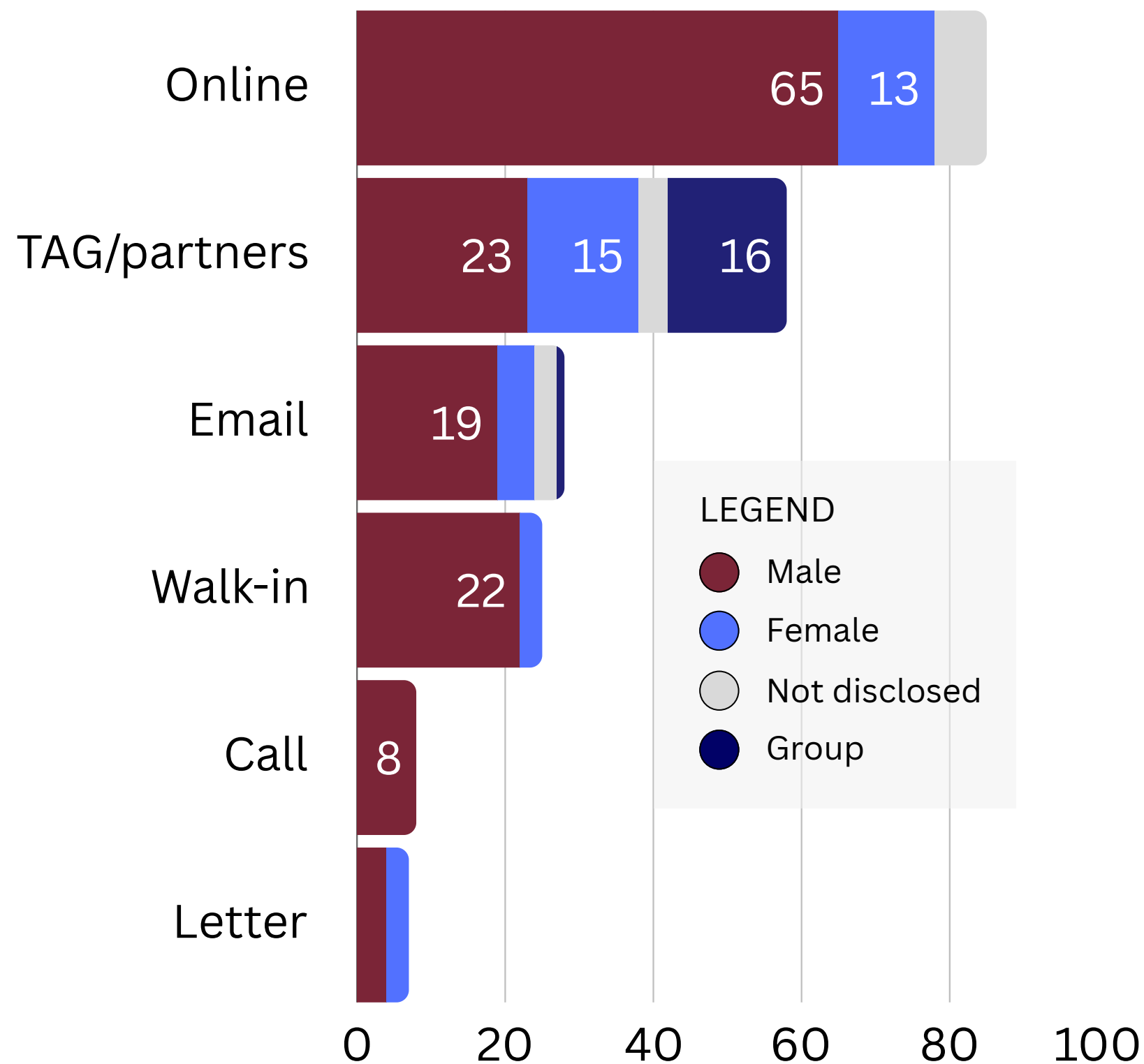


Outcome of cases reported to ALAC



- 26% of all reports were referred to LEAs and local authorities and other mandated institutions
- For 47 out of 54 of these cases, however, the LEAs or relevant authorities have not provided feedback on their reception and handling of the cases
- 16% of the cases were closed at initial contact with ALAC due to insufficient evidence provided by the complainants
- Almost one thirds of all reports are still under internal investigation by TI-Z (30%)

How people report corruption to TI-Z

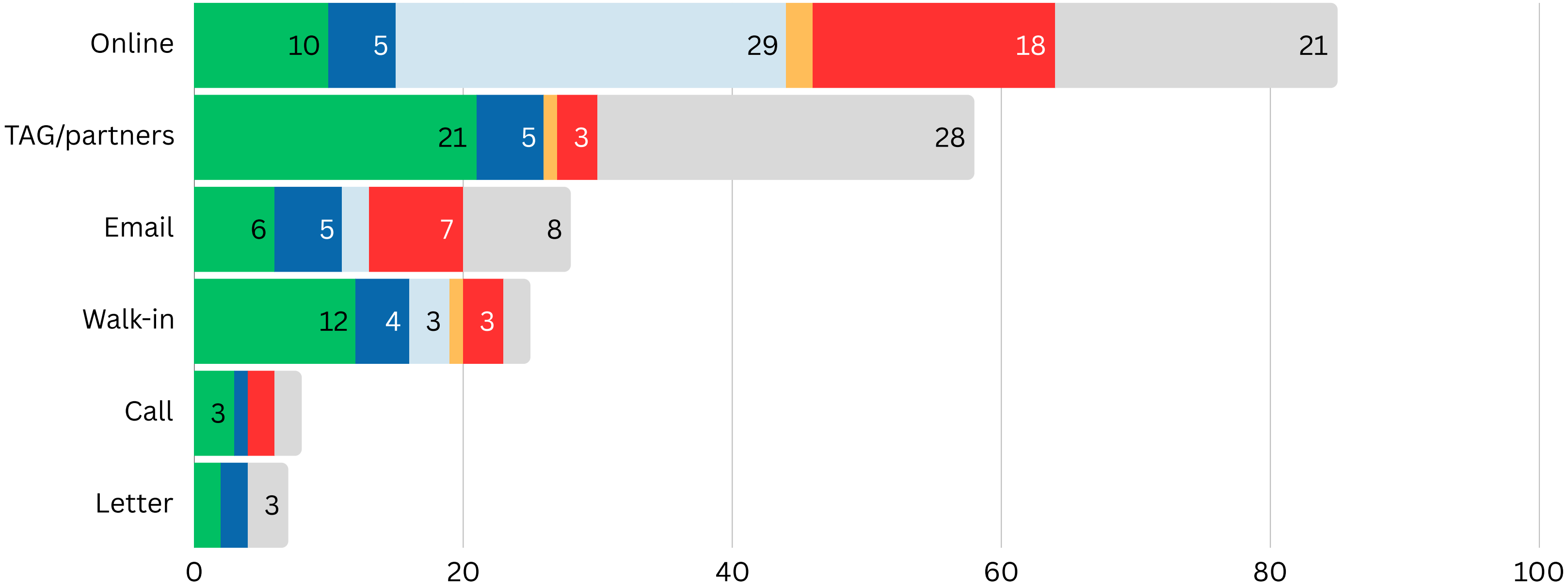


- The online platform and the locally based Transparency Action Groups (TAGs) were the most popular channels to report corruption to TI-Z (respectively accounting for 40% and 27% of reports received).
- Only the channel provided by the TAGs presents a reduced gender gap. Most of the complaints made by groups of concerned citizens (many of which included women) were facilitated by the TAGs.
- The TAGs and walk-ins were the most successful channels in terms of referrals to Law Enforcement Agencies (LEAs) and authorities (next page).
- The online channels (website, social media, emails) generated the highest number of reports closed due to insufficient evidence. Many of these reports presented incomplete evidence or were made by individuals who did not follow up on their earlier reports.

Effectiveness of each reporting channel

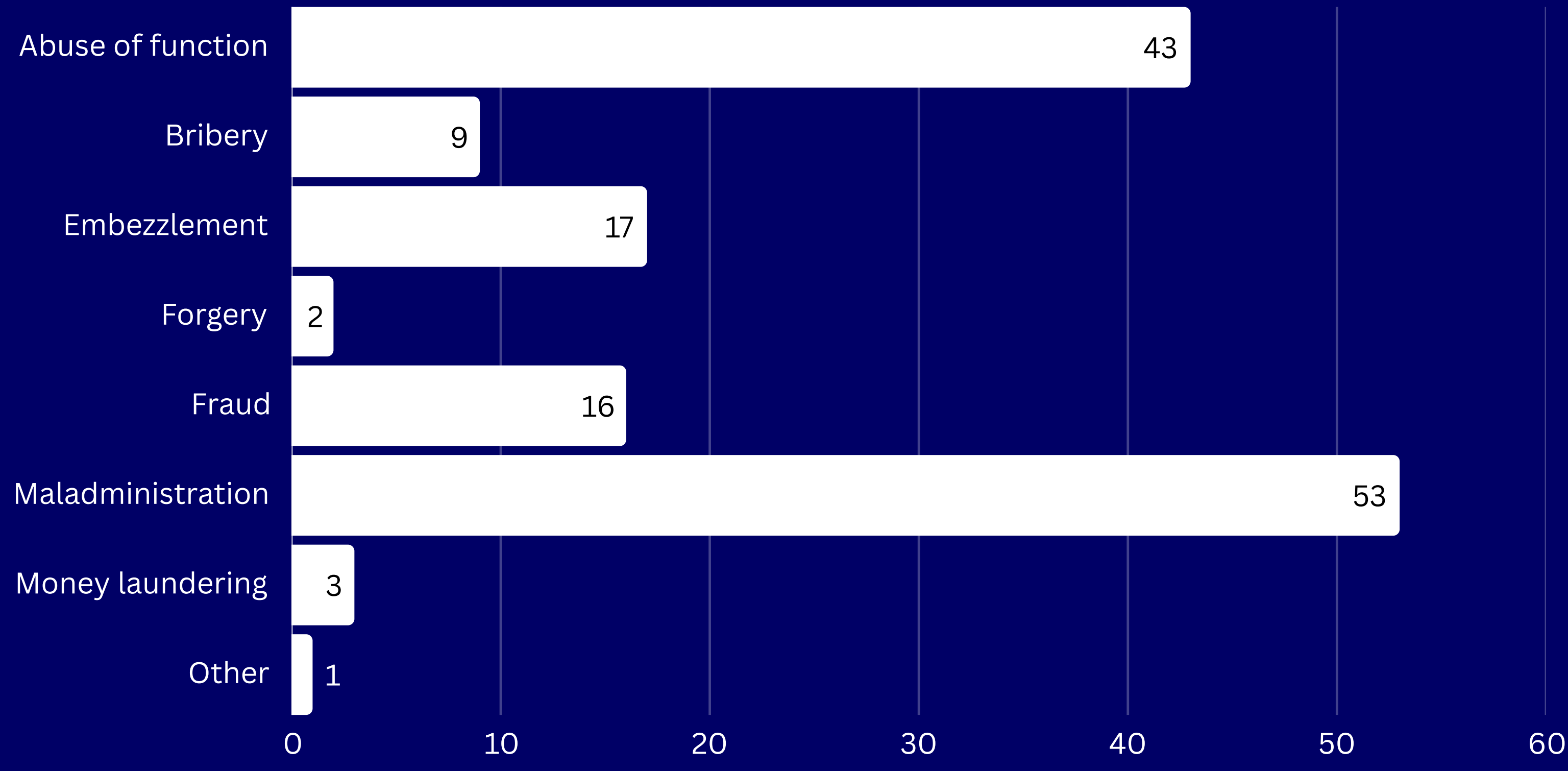
LEGEND

- Referred to LEAs or authorities
- Closed before institutions or Courts
- Shared information or legal advice
- Case resolved
- Closed due to insufficient evidence
- Investigated by ALAC

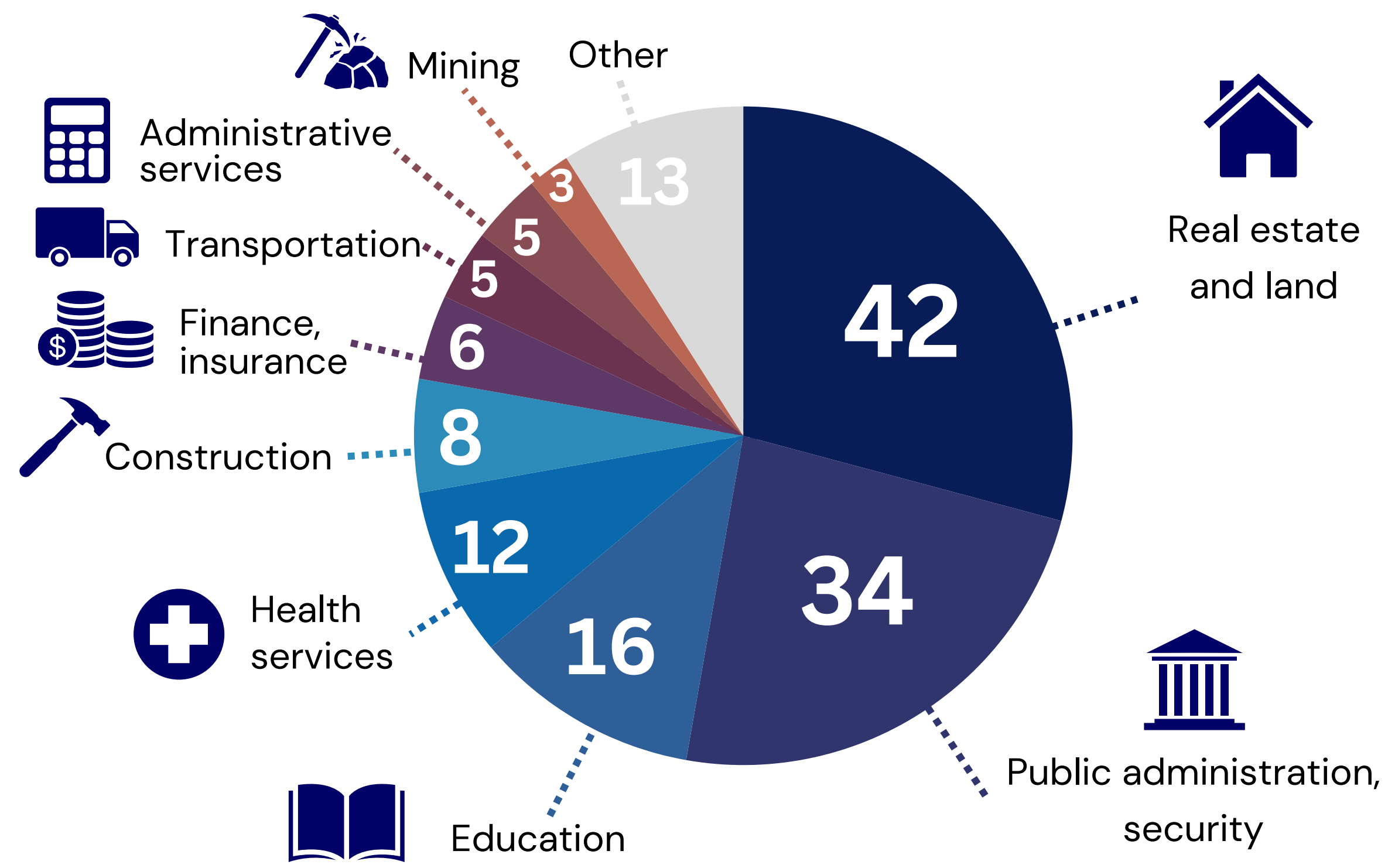


Typologies of corruption

Tot: **144** corruption reports (out of 211 reports)

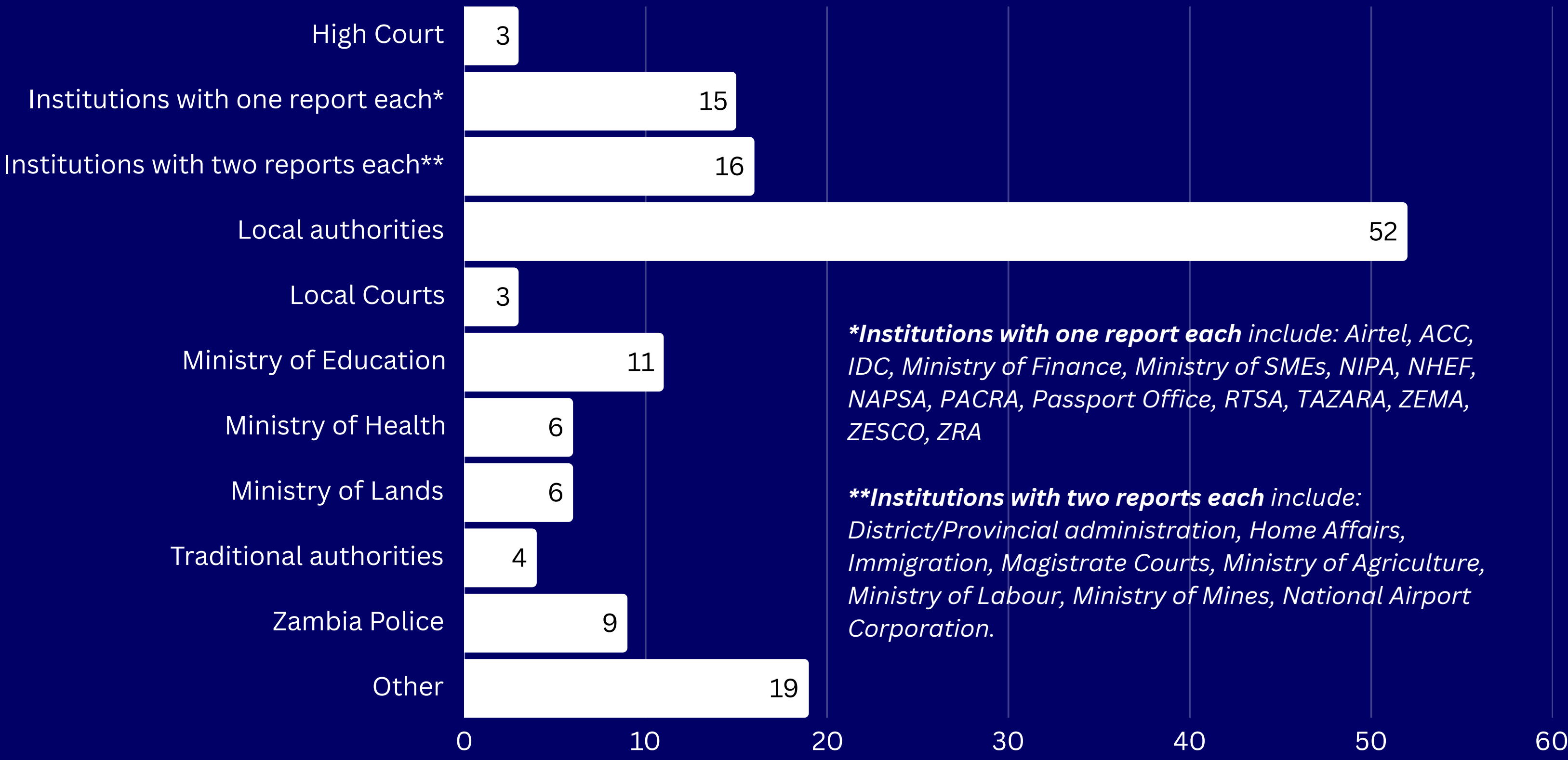


Most affected economic sectors



Most affected institutions

CORRUPTION TRENDS

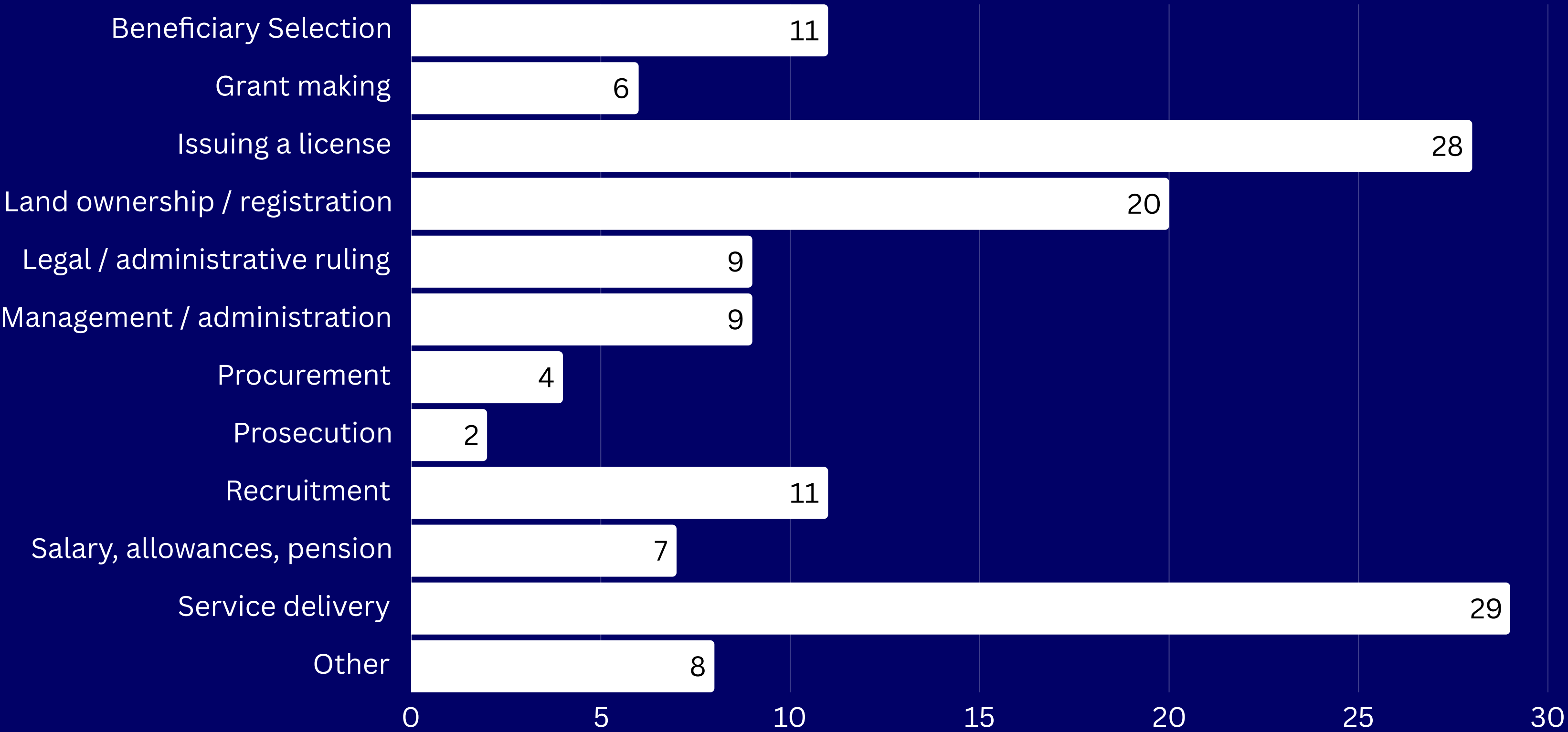


***Institutions with one report each** include: Airtel, ACC, IDC, Ministry of Finance, Ministry of SMEs, NIPA, NHEF, NAPSA, PACRA, Passport Office, RTSA, TAZARA, ZEMA, ZESCO, ZRA

****Institutions with two reports each** include: District/Provincial administration, Home Affairs, Immigration, Magistrate Courts, Ministry of Agriculture, Ministry of Labour, Ministry of Mines, National Airport Corporation.

Most affected processes

CORRUPTION TRENDS





MALADMINISTRATION

Typologies of corruption

Maladministration (53 reports)



Most affected sector

Land and real estate (27)
Public administration/security (12)



Most affected institution

Local authorities (32)
Ministry of Lands (3)



Most affected process

Issuing a license (24)
Land ownership/registration (8)
Service delivery (7)



Most affected provinces

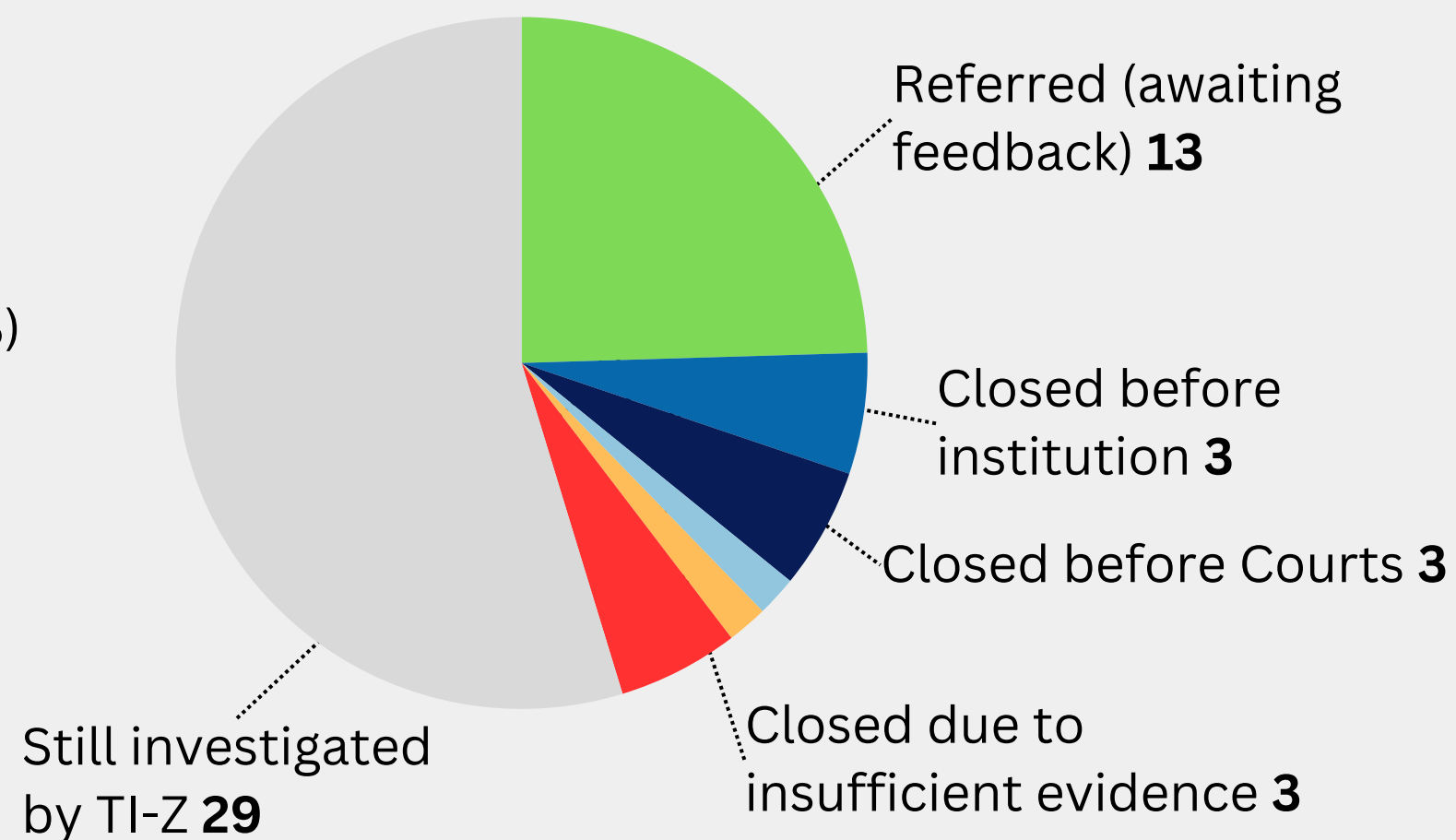
Southern (22)
Copperbelt (10)
Lusaka (8)



Reporting channel

TAGs (26)
Website (14)

Final outcome





MALADMINISTRATION

Typologies of corruption



Case Study: **Where is the land I bought?**

In November 2024, a complainant approached ALAC to denounce acts of maladministration committed by the City Council while he/she purchased a plot of land. This kind of episode, unfortunately, is so common that to many it has become the norm.

The complainant alleges that following the advertisement by the City Council for the sale of land plots, he/she applied and was invited for interviews in 2020 to which he/she was successful. After this, the complainant paid to the Council a

sum of over K20,000 to be considered for the purchase, and a few months later paid another k4,000 to the Ministry of Lands and was issued with an offer letter for the said piece of land.

Unfortunately, things did not progress much after that. Contending that there has been a dispute on the said plot, the Council failed to show the plot to our complainant, who is furious for not having access to what he/she paid for. After investigation, ALAC referred this case to OPPZ, which is currently looking into it.



ABUSE OF FUNCTION

Typologies of corruption

Abuse of function (43 reports)



Most affected sector

Public administration/security (11)
Education (8)



Most affected institution

Local authorities (14)
Ministry of Education (6)
Zambia Police (5)



Most affected process

Service delivery (10)
Recruitment (7)
Beneficiary selection (6)



Most affected provinces

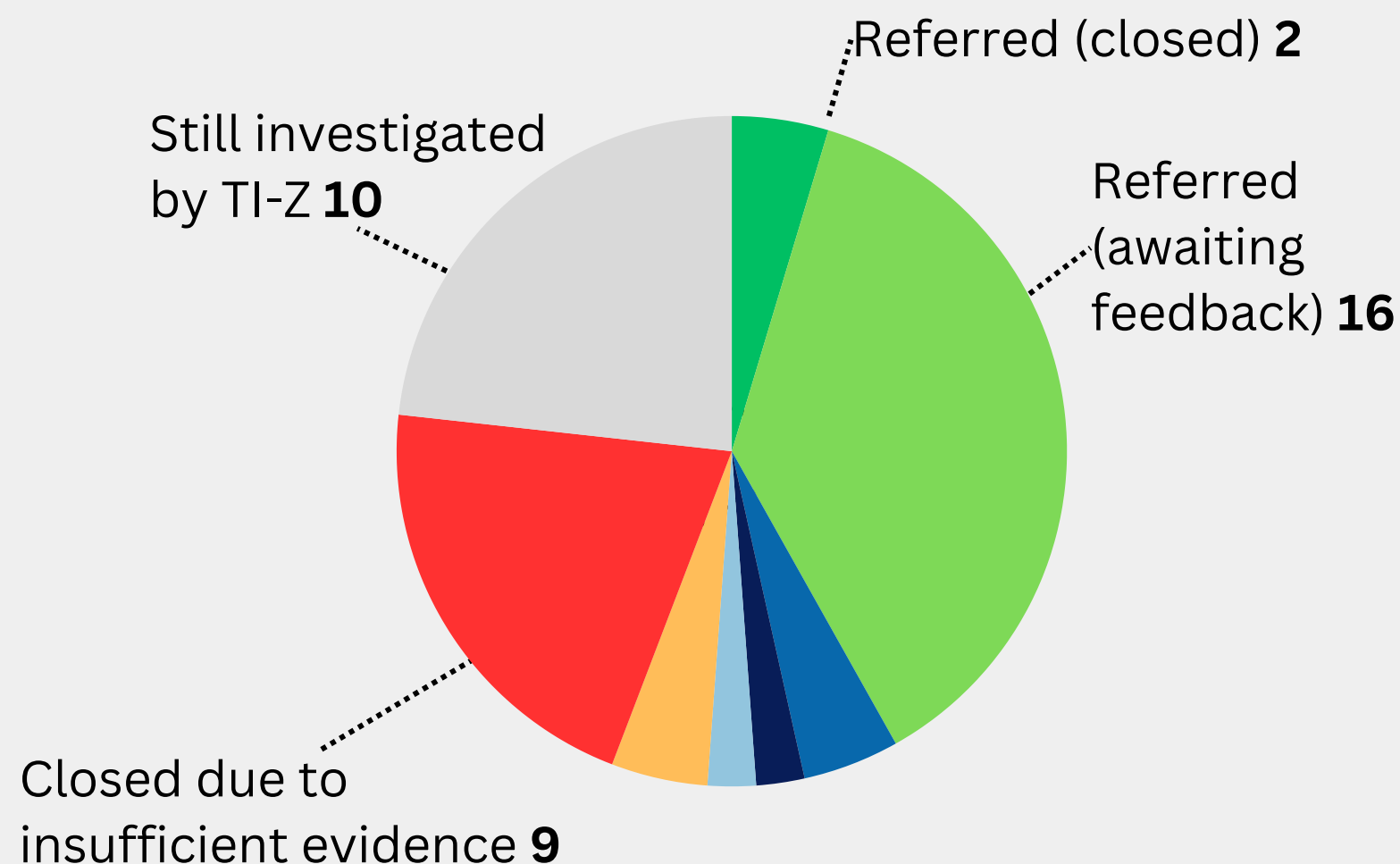
Copperbelt (10)
Lusaka (10)



Reporting channel

TAG (14)
Website (11)
Email (10)

Final outcome





ABUSE OF FUNCTION

Typologies of corruption



Case Study: **Zambia Police retaliates against whistleblower officer for exposing abuse**

In September 2024, an internal whistleblower submitted a concerning report to ALAC, alleging that he/she suffered retaliation from the Zambia Police for exposing abuse of authority. This was not the first time he/she approached TI-Z, which made the matter even more worrying.

The complainant alleges that following the Inspector General of Police's directive that authorities should stop levying allowances for officers deployed to guards banks and other places, he/she wrote a letter to the Inspector General of Police complaining about the recurrence of such incidents that he/she was a witness to. Following the letter, the complainant was summoned to report at the Police

Force Headquarters for questioning regarding the letter he/she wrote.

A few months later the complainant was transferred to another Province where he/she continued receiving similar retaliation whenever he/she questioned levies on allowances for officers. The complainant alleges becoming a target of abuse by colleagues and superiors in every instance, even when the Police receives anonymous letters that were written by other whistleblowers.

The matter is undeniably serious. ALAC has referred the case to the Anti-Corruption Commission, but is still awaiting for a formal feedback from the institution.



EMBEZZLEMENT

Typologies of corruption

Embezzlement (17 reports)



Most affected sector

Health (5)
Public administration/security (4)



Most affected institution

Local authorities (6)



Most affected process

Management/Administration (4)
Service delivery (4)



Most affected provinces

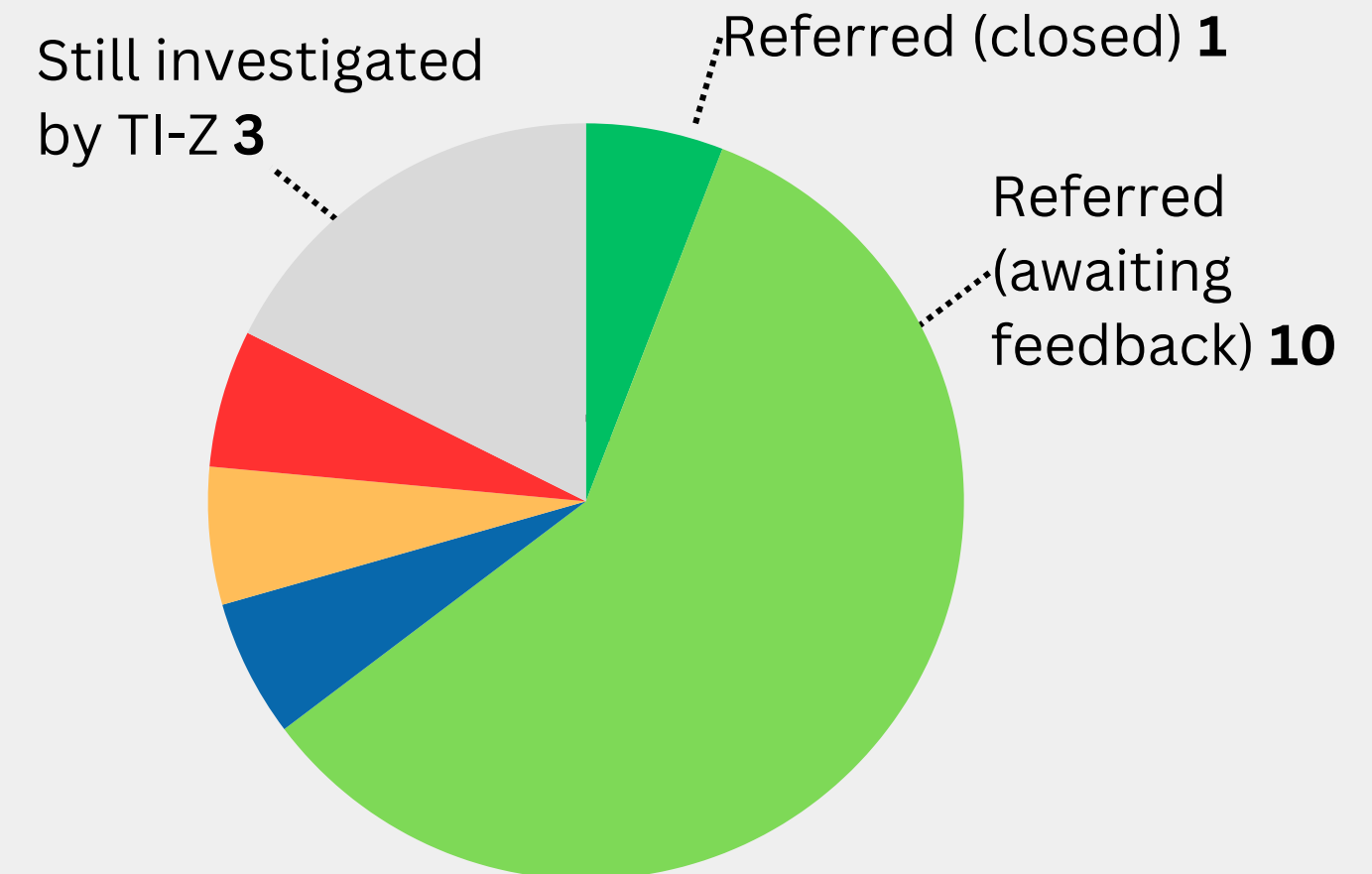
Northern (5)
Southern (4)
Copperbelt (4)



Reporting channel

TAG (7)
Website (7)

Final outcome





EMBEZZLEMENT

Typologies of corruption



Case Study: **Who benefits from the Social Cash Transfer programme?**

In October 2024, during an outreach activity organized with the Transparency Action Group in Ndola, an anonymous whistleblower came forward with allegations of corruption, embezzlement and bribery occurring in the Social Cash Transfer programme.

According to him/her, ***the process of beneficiary selection is not transparent, nobody knows who receives the money or how beneficiaries are selected.*** Allegedly, the selected individuals were either linked to Community Social Welfare Assistant committees (CWACs) or were asked and accepted to pay K50 to K200 in bribes. Moreover, some of the people receiving social cash transfer are not eligible; that was the case of people in gainful employment, or of energetic youths who are not

orphans.

Those who suffer the most from this are pregnant women, lactating mothers, and aging women, all of whom really depend on the cash transfers to provide for their needs and for their loved ones.

The anonymous whistleblower went to ask for clarifications as to why ***those captured and registered in*** the first place were not appearing on the final list, and was told that the matter was beyond the control of that office. After reporting this matter to the TAG, the case was referred to OPPZ and to local authorities, who are currently looking into it. TI-Z is awaiting the feedback meeting with the authorities to discuss updates on this burning issue.



FRAUD

Typologies of corruption

Fraud (16 reports)



Most affected sector

Real estate / land
administration (10)



Most affected institution

Ministry of Lands (3)
Several private institutions



Most affected process

Land ownership / registration (8)
Service delivery (4)



Most affected provinces

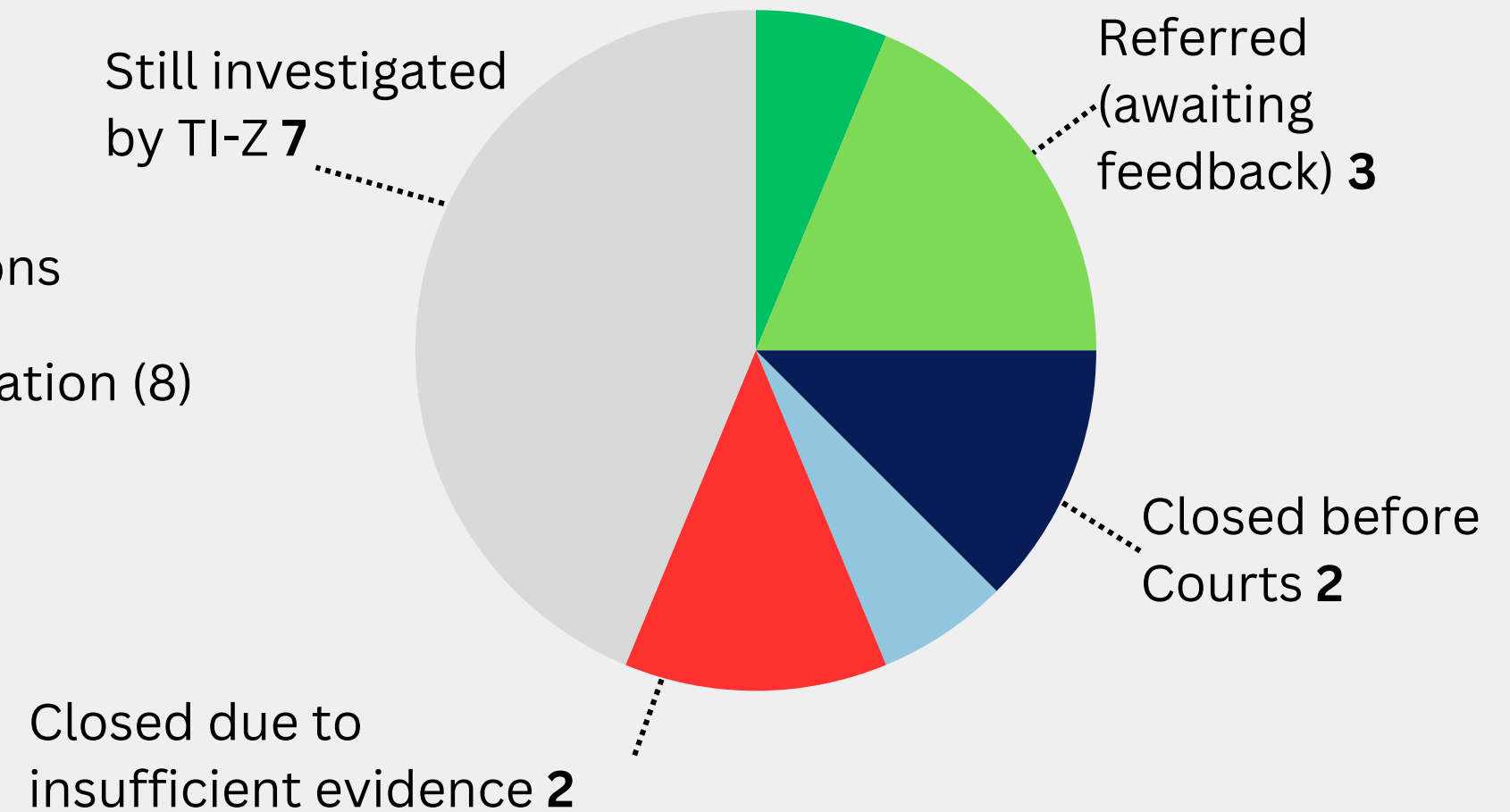
Lusaka (10)



Reporting channel

Website (7)
Email (5)

Final outcome





FRAUD

Typologies of corruption



Case Study: **Fraudulent land sale by Council employee**

A Complainant from Muchinga province came to TI-Z to report a case of land fraud. He/she purchased a plot from an employee of the Council, for over K20,000, and a contract of sale was signed to that effect. A couple years later, the Complainant was allegedly advised that the said plot in fact belonged to another person who was awarded as compensation. The Complainant conducted a search at the Ministry of Lands and the Council minutes for the previous year, which revealed that the Council employee was in fact the owner of the

plot. The Complainant alleges that the Legal Department at the Council advised that there was nothing that could be done as the land was owned by another person. Meanwhile, the said employee was transferred to another Municipal Council and remained unreachable via phone. The Complainant demands access to the plot, for which he/she paid.

The case, which was brought to TI-Z's attention towards the end of 2024, is currently being internally investigated by the ALAC team.

LOCAL AUTHORITIES

Most affected institutions

Local authorities (52 reports)



Typology of corruption

Maladministration (32)
Abuse of function (14)
Embezzlement (6)



Most affected sector

Real estate / land administration (24)
Public administration / security (11)
Construction (6)



Most affected process

Issuing a license (20)
Service delivery (9)
Beneficiary selection (5)
Land ownership / registration (5)



Most affected provinces

Southern (26)
Copperbelt (10)
Northern (7)



Reporting channel

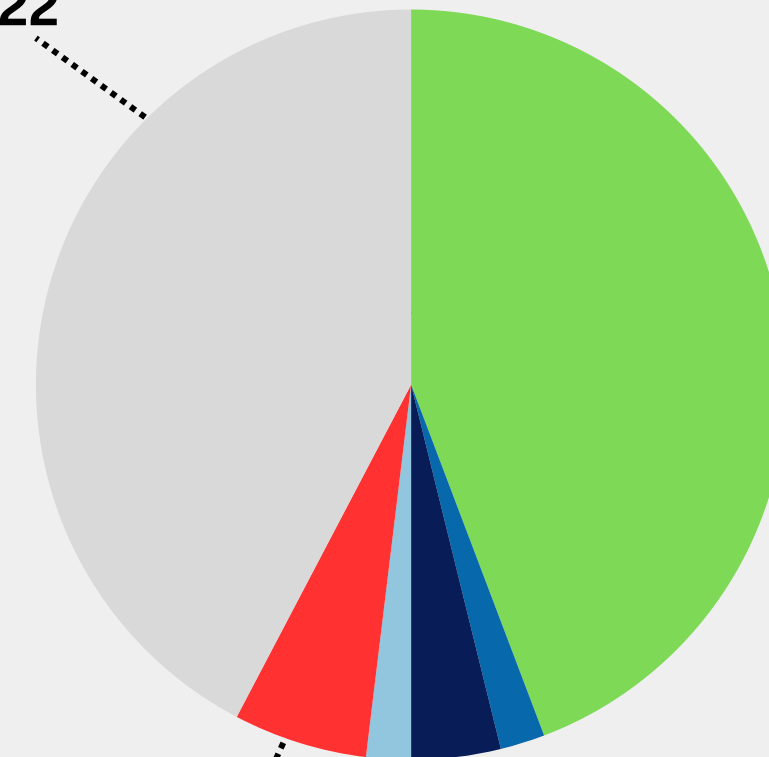
TAGs and partners (38)

Final outcome

Still investigated
by TI-Z **22**

Referred
(awaiting
feedback) **23**

Closed due to
insufficient evidence **3**



CDF CORRUPTION

By local authorities

Most affected institutions



Case Study: **Unqualified contractors hired to work on construction for CDF projects**

In October 2024, a group of concerned citizens from Northern province reported to the Transparency Action Group (TAG) allegations of wrongdoing in the realization of CDF projects in their community. The whistleblowers explained that a construction project to rehabilitate a road in their community had been finished, however the job was not complete: the contractor had failed to build the bridges which were essential to use that road. When consulted, the site engineer indicated the BOQ in this contract did not include any bridge.

The citizens shared also concerns over the construction work on a bridge in another ward, which had been awarded to a suspicious contractor. That same contractor had failed to do road embankments in Western Province and had been paid already. When asked for the design of the embankments, they were given skeletons of the design which did not have any details of the

engineer.





The community complained that the contracts were being awarded to unknown and unqualified contractors, who failed to deliver on communities' expectations. The lack of transparency surrounding the awarding of these contracts makes it hard to pinpoint with precision the nature of the wrongdoing. However, hints point out some level of collusion between local authorities and the contractors in awarding construction contracts for CDF projects. What is certain is that citizens are not benefitting from the CDF projects as expected.

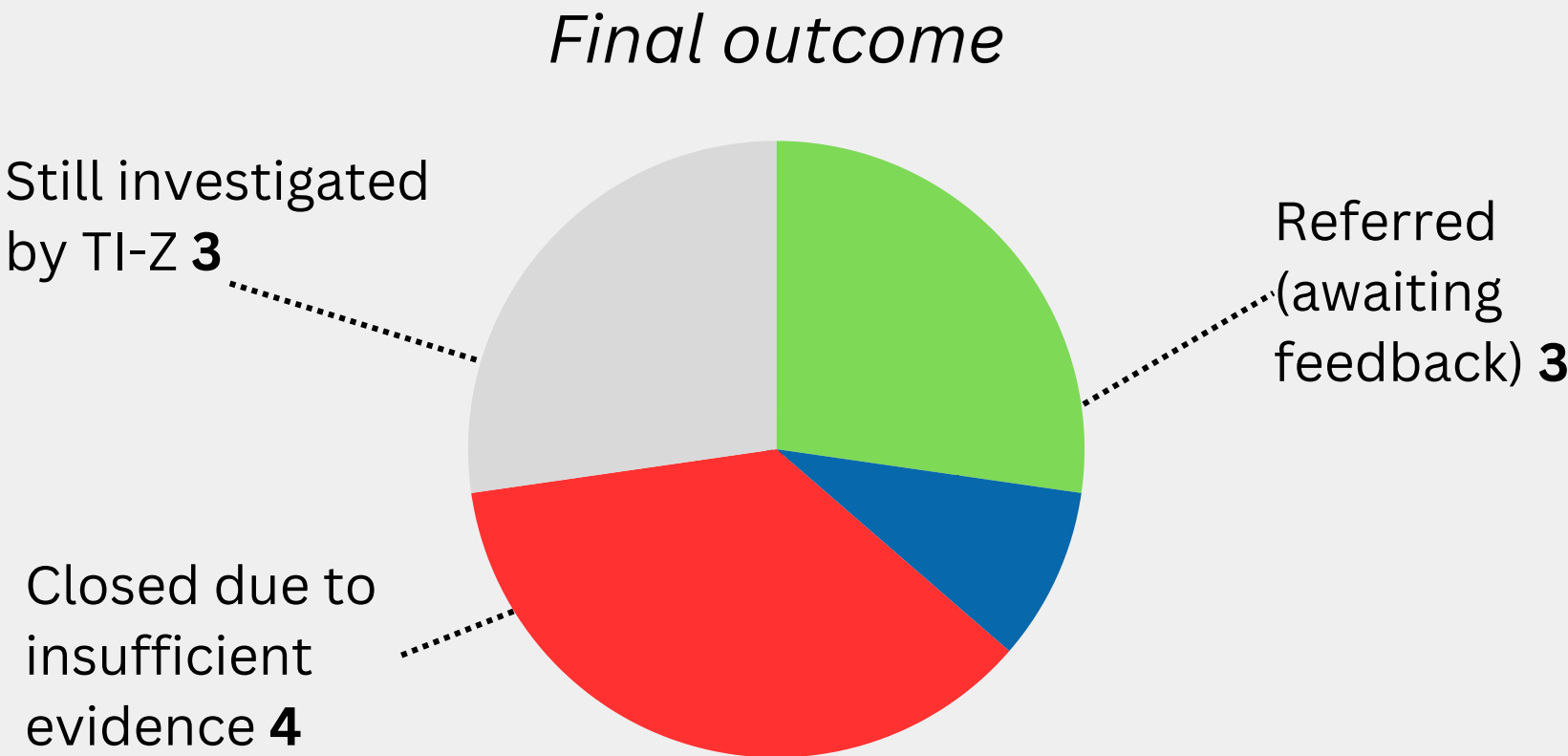
Following the TAG's involvement, the matter was brought before the local authority, and TI-Z is closely monitoring the case to ensure that the authorities are giving it the required attention. A feedback meeting with the local authority is expected in March 2025.

MINISTRY OF EDUCATION

Most affected institutions

Ministry of Education (11 reports)

	<i>Typology of corruption</i>	Abuse of function (6)
	<i>Most affected process</i>	Recruitment (3)
	<i>Most affected provinces</i>	Lusaka (3)
	<i>Reporting channel</i>	Online platform (6) Email (4)



MINISTRY OF EDUCATION

Most affected institutions



Case Study: **Headteacher and accountant collude to systemically steal school funds**

"Please help by intervening in our situation with speed. This office is so corrupt. If you go directly to the office, they will manipulate you in trying to cover up for the mess. Things are not okay here. We are really suffering here. Please don't delay."

The whistleblower, a primary school teacher from Northern province, reached out to TI-Z in visible distress, with accusations of abuse of office and embezzlement occurring at his/her school and in the district.

According to the whistleblower, the Headteacher of their school has taken personal hold of the school's administration, and has started undertaking the duties of the school accounting officer and the procurement officer. This has allowed the Headteacher to squander school funds and CDF

grants meant for smooth operations of the school. Moreover, he/she has been working closely with the District Accountant at the DEBs office to withdraw money and share it with accomplices, at the expense of the school for which the money was meant to be. There are no proper accountability records to be found, as the district accountant always covers up for the Headteacher. The whistleblower lamented that the members of staff are not allowed to question the Headteacher and anyone that does so is frustrated in their efforts. He/she appealed to TI-Z ALAC to intervene in the matter.

After internal investigation by ALAC, the case was referred to the Provincial Principal Office. TI-Z is following up to gather updated on the pending case.

....



SERVICE DELIVERY

Most affected processes

Service Delivery (29 reports)



Typology of corruption

Abuse of function (10)
Maladministration (7)



Most affected sector

Public administration, security (12)
Construction (5)



Most affected institution

Local authorities (9)
Zambia Police (6)



Most affected provinces

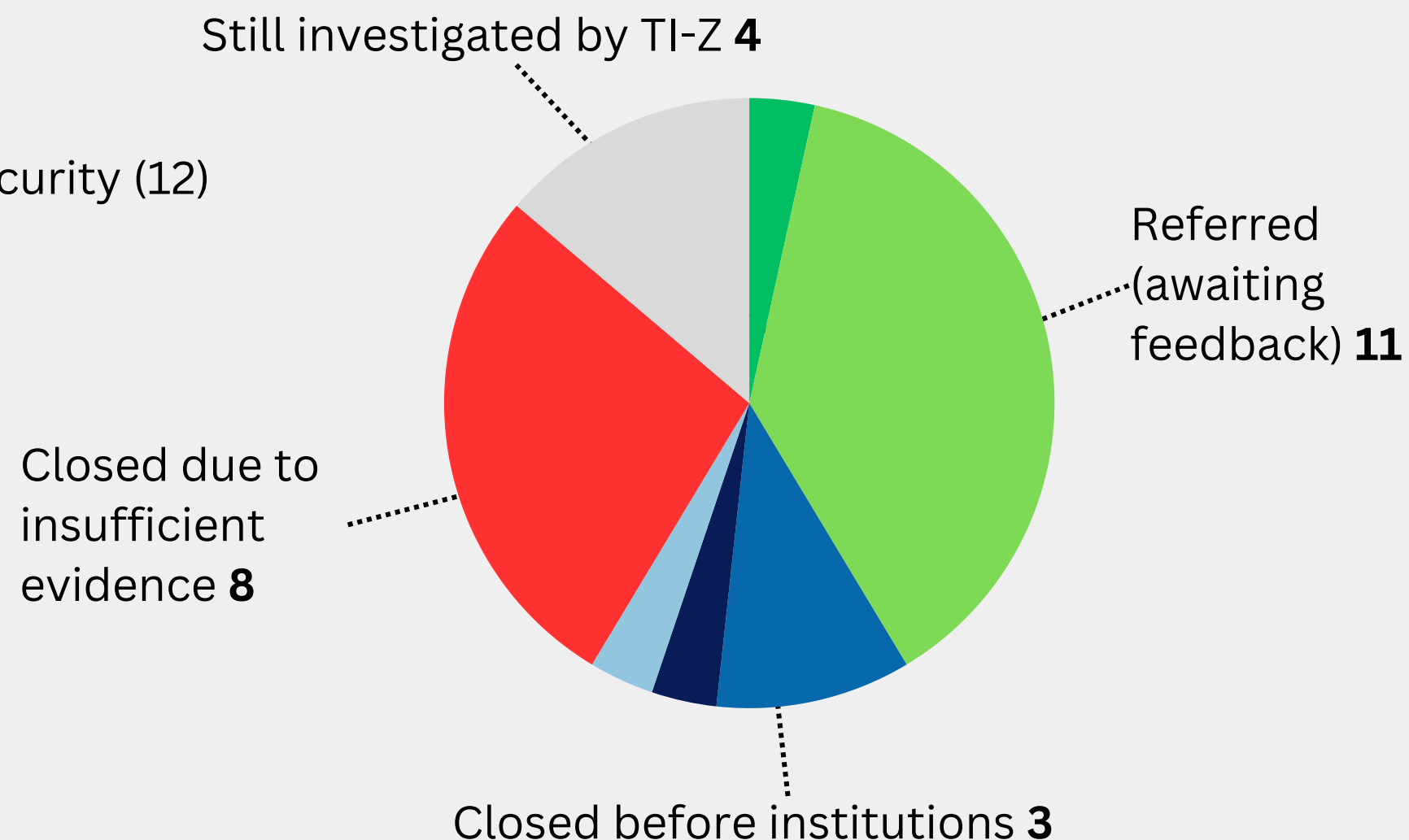
Lusaka (12)
Copperbelt (6)
Eastern (5)



Reporting channel

Website (11)
TAG (8)

Final outcome





SERVICE DELIVERY

Most affected processes



Case Study: **Workers Compensation Control Board fails to assist worker injured while on duty**

In 2022, the complainant was tasked to carry out reparation work by his/her employer in a rural area. Because of the insufficient funds provided by the employer to cover transport costs, the complainant had to hitchhike using a truck that was heading in the same direction. Unfortunately, the truck was later involved in an accident; the complainant became unconscious and only regained consciousness at the hospital. Later, when discharged from the hospital, he/she engaged the company's Human Resources for compensation for the injury but was advised that he could not be compensated.

Given that the accident had severely affected the complainant's ability to work, he/she proceeded to undertake a thorough medical examination. Thereafter, the complainant engaged the Workers Compensation Control Board, but the receiving

Doctor allegedly stated that he would not certify any impact of the injury in any test "because he/she looked fine", without conducting any assessment. The complainant lodged a complaint with Workers Compensation against the employer for not registering the injury with Workers Compensation as required by the law, but Workers Compensation allegedly took no action against the company.

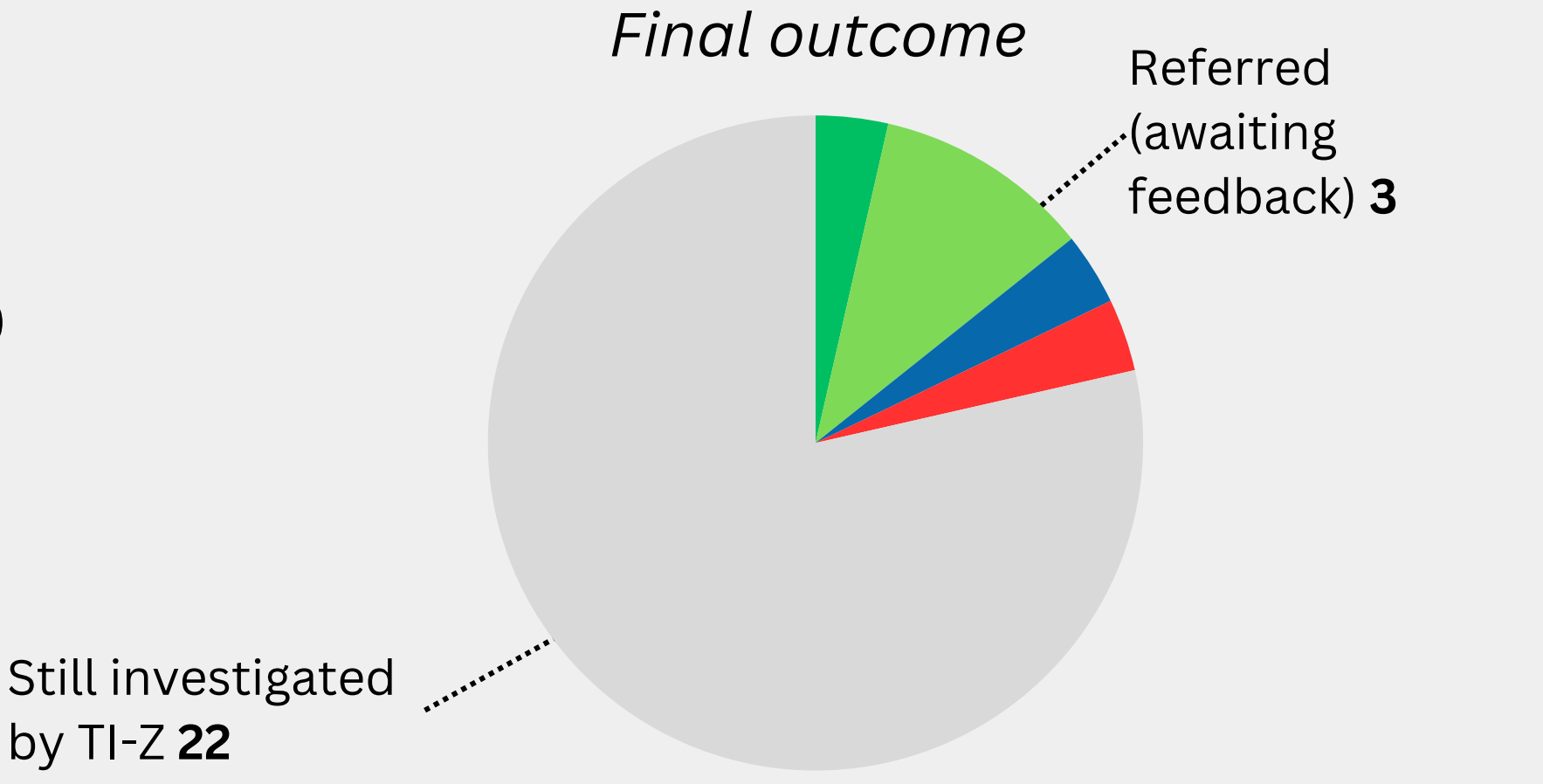
This unfortunate story documents wrongdoing on both levels, concerning the private sector's employer failure to comply with the law as well as the Workers Compensation Control Board's failure to deliver the services assigned to it. The case was referred by ALAC to OPPZ and ACC. ALAC was informed by the complainant that he/she had received feedback directly from the institutions, even though these have not formally notified TI-Z of their involvement.

ISSUING A LICENSE

Most affected processes

Issuing a license (28 reports)

-  *Typology of corruption* Maladministration (24)
-  *Most affected sector* Real estate and land (20)
-  *Most affected institution* Local authorities (20)
-  *Most affected provinces* Southern (20)
-  *Reporting channel* TAG (19)



ISSUING A LICENSE

Most affected processes



Case Study: **Whistleblowers join forces to report maladministration in the issuance of land licenses**

Following a sensitization activity led by TI-Z and the TAG in Southern Province, several complainants (23, to be exact) came forward sharing allegations of maladministration regarding the issuance of Occupancy Land Licences, all incriminating the same Municipal Council.

For instance, one of the complainants allege that in 2021, he/she paid for the occupancy licences for 3

plots but the Council did not issue the licences. The complainant is still waiting for justice. Similar allegations arose from the other complainants who participated in the same session.

ALAC, jointly with the TAG, has been looking into the bulk of cases and is handling them jointly, given that they concern the same institution. A final action will be soon undertaken.

....



LAND OWNERSHIP/REGISTRATION

Most affected processes

Land ownership/registration (20 reports)



Typology of corruption

Fraud (8)
Maladministration (8)



Most affected institution

Ministry of Lands (6)
Local authorities (5)
Traditional authorities (3)



Most affected provinces

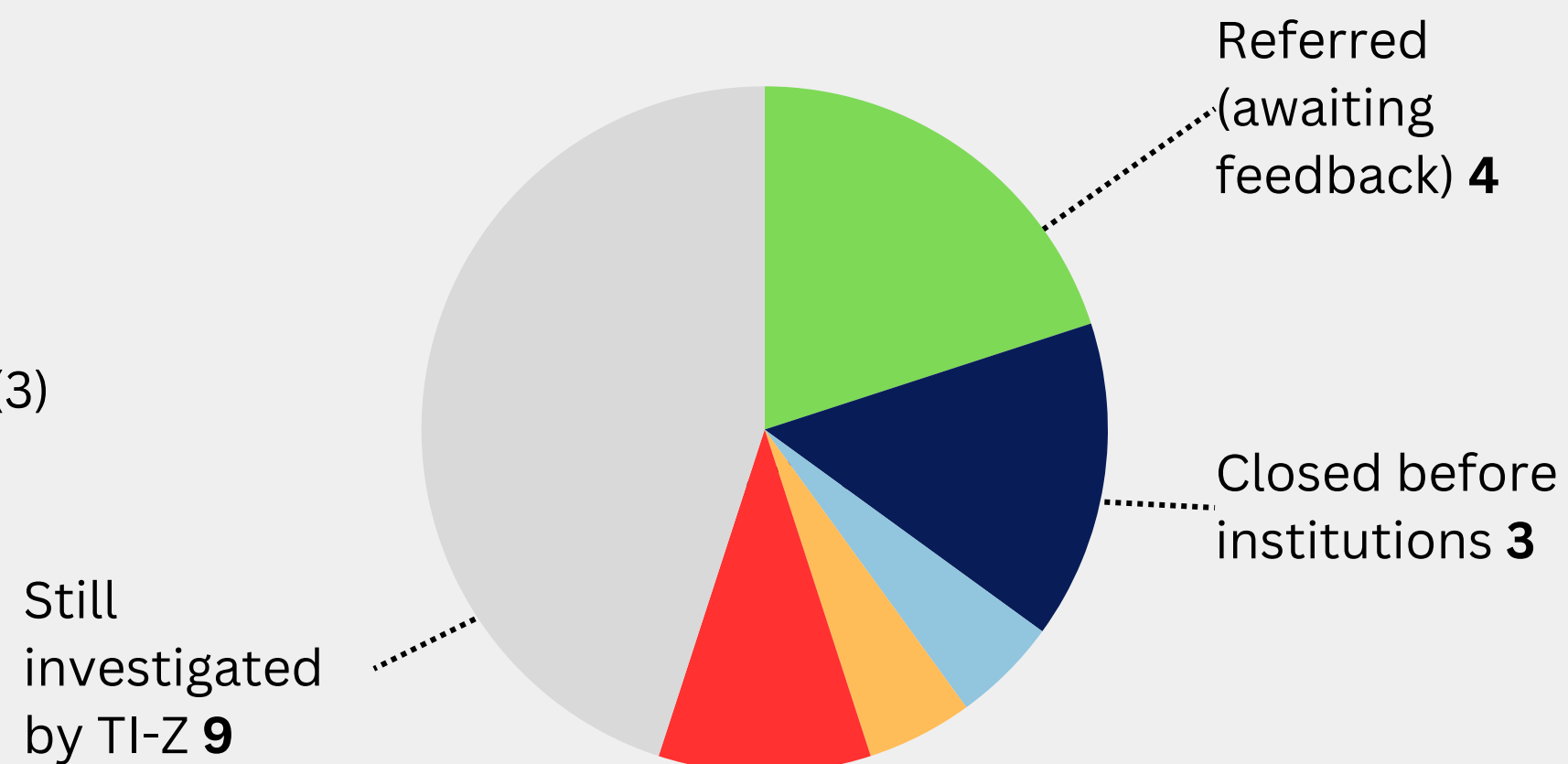
Lusaka (9)
Copperbelt (5)



Reporting channel

Email (7)
Website (7)

Final outcome





LAND OWNERSHIP/REGISTRATION

Most affected processes



Case Study: **Traditional authorities involved in fraudulent land sale?**

The complainant alleges that he/she was a victim of a fraudulent sale of traditional land.

Eight years back the complainant had purchased the piece of land and made a full payment for it. However, two years ago, the said land was sold by the traditional leader to another person, after which the complainant followed up with the traditional

leader over the same but without receiving any help. The complainant proceeded to seek redress from the Subordinate court a year ago, but the matter was yet to be heard when the complainant came to TI-Z.

After engaging TI-Z, the matter was taken up by the relevant Court and was therefore closed by ALAC.



BENEFICIARY SELECTION

Most affected processes

Beneficiary selection (11 reports)



Typology of corruption

Abuse of function (6)



Most affected sector

Health (4)



Most affected institution

Local authorities (5)



Most affected provinces

Copperbelt (6)



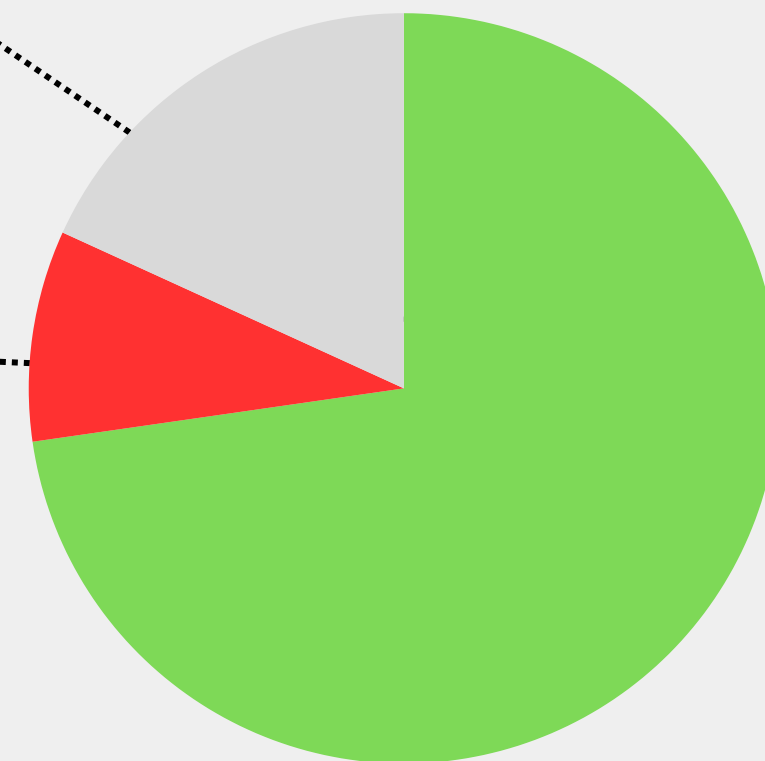
Reporting channel

TAG (10)

Still investigated
by TI-Z **2**

Closed due to
insufficient
evidence **1**

Final outcome



Referred
(awaiting
feedback) **8**



BENEFICIARY SELECTION

Most affected processes



Case Study: **Cash for Work is not working as it should**

Cash for Work (CfW) is part of the drought emergency interventions that the Government has launched in 2023/2024 to address the challenges posed by the drought and ensure that no one dies of hunger. The programme offers immediate financial relief (K60 per day to each eligible individual for 10 days in a month) to vulnerable individuals by providing short-term employment in exchange for their labour on public works projects.

While not questioning the good motives behind the programmes, a complainant from the Copperbelt has approached the local TAG at the end of 2024 to share some concerns over the process of beneficiary selection. According to him/her, in order to be considered, beneficiaries need to be politically affiliated. In some wards, community

members are not given an opportunity to participate, hence the programme brings in people outside the ward. Moreover, some of the beneficiaries are allegedly made to pay appreciation fees after payment for the said work. Finally, the complainant reported that the people working for Cash for Work are not provided with Personal Protective Equipment (PPE) needed for personal injury prevention on the workplace.

The report makes it alarmingly clear that the programme is marred by corruption incidents including instances of abuse of office, bribery and maladministration. ALAC has taken these claims very seriously and is currently looking into them, with the help of the local TAG, to assess the best way forward.

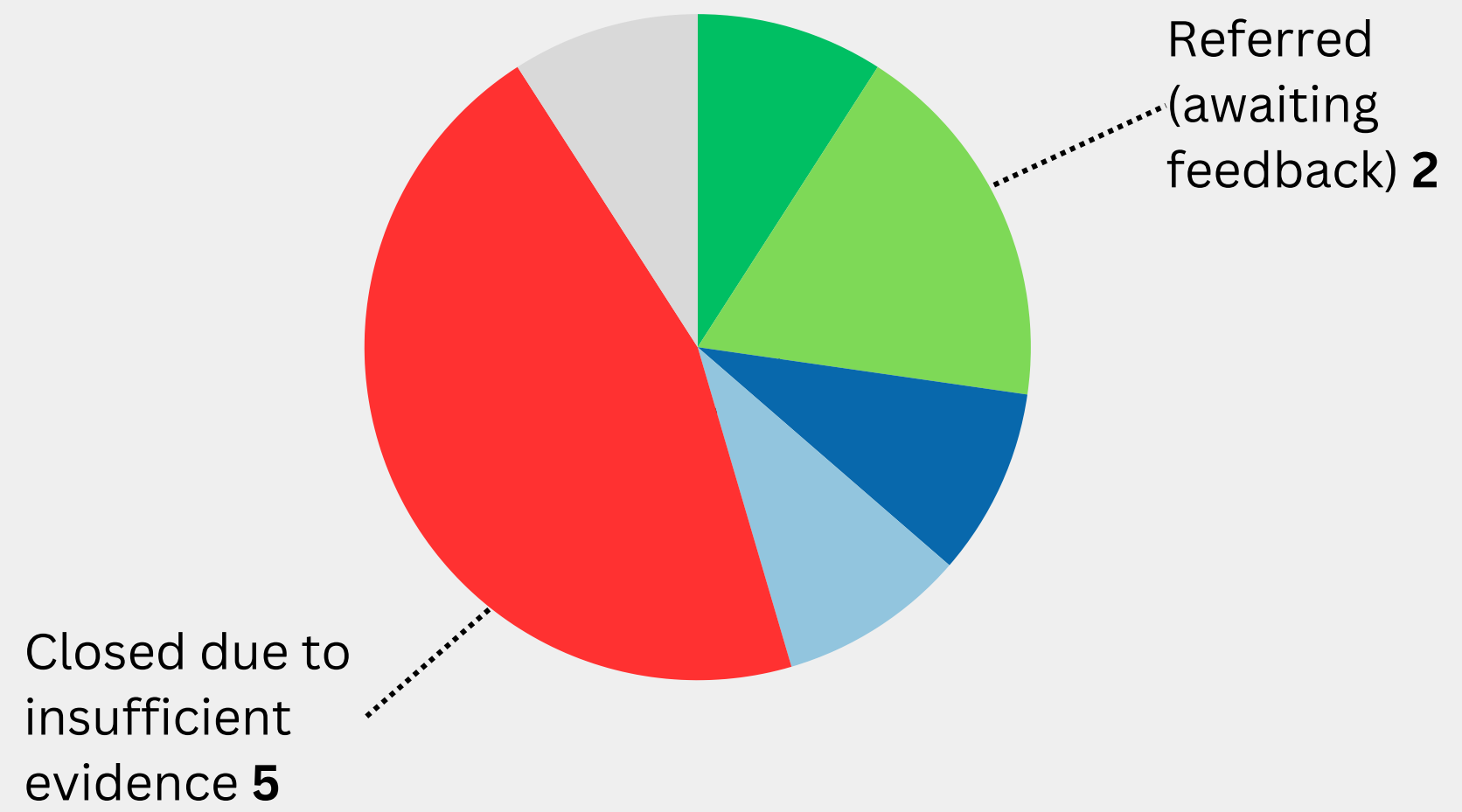
RECRUITMENT

Most affected processes

Recruitment (11 reports)

	Typology of corruption	Abuse of function (7) Bribery (3)
	Most affected sector	Education (3) Health (3)
	Most affected institution	Ministry of Education (3)
	Most affected provinces	Lusaka (4) North-Western (2)
	Reporting channel	Website (5) Email (3)

Final outcome



RECRUITMENT

Most affected processes



Case Study: **Cholera volunteer's job expectations betrayed**

In August 2024, ALAC was approached by a complainant alleging corruption in the recruitment process of volunteers by the Ministry of Health.

The complainant, a qualified and registered midwife, had volunteered at a health facility during the cholera outbreak in the early months of 2024.

Following the pronouncement by President Hichilema to the effect that all health workers who had volunteered during the cholera period were to be employed, the complainant applied with positive expectations of finding employment.

The Complainant alleged that, when time for employment came, his/her name was replaced with those of three (3) individuals who had not even

volunteered at the cholera center. The Complainant addressed a letter of enquiry to the Permanent Secretary for Technical Services in the Ministry of Health seeking an explanation, but without receiving any response.

After receiving the report, ALAC conducted an investigation. With guidance from TI-Z's legal committee, ALAC resolved to provide legal guidance to the complainant, sharing indications on how best to proceed and to which authority to address the complaint. ALAC has also engaged the Anti-Corruption Commission on the subject matter, to explore possible legal bases for referral.

SUMMARY OF FINDINGS

Typologies of corruption

- The most reported typologies of corruption were, in decreasing order, maladministration (37%), abuse of function (30%), embezzlement (12%) and fraud (12%)
- Maladministration cases reported to ALAC primarily concerned the process of issuing land licenses and land registration by local authorities. These were among the most affected processes by corruption.
- The portion of women and youths reporting maladministration was higher than for other typologies of corruption
- Reported abuse of function cases concerned public officers from various institutions, most frequently local authorities and Ministry of Education, who abused service delivery, recruitment, and beneficiary selection processes to their own advantage.
- Crimes relating to embezzlement were primarily reported within local authorities and health services
- Fraud was reported across both public and private institutions, primarily concerning land ownership and registration.

Sectors affected

- Almost one case out of three that ALAC handled in 2024 dealt with land and real estate, making it the most affected economic sector by corruption
- Other strongly affected sectors include, in decreasing order, public administration and security (24%), education (11%), and health (8%)

Institutions affected

- The most affected institutions by corruption were, by far, local authorities (36%), followed by the Ministry of Education (8%)
- Local authorities played a strong role in most CDF-related cases of corruption, with frequent incidents of abuse of function and embezzlement being reported during service delivery, beneficiary selection and grant making.
- Reports against the Ministry of Education alleged abuse of function and embezzlement in a wide range of processes, including teacher recruitment, the payment of salaries and allowances, CDF grants, and the delivery of education services.

SUMMARY OF FINDINGS

Processes affected

- The most affected processes by corruption were, in decreasing order, service delivery (20%), issuing a license (19%), land ownership and registration (14%), beneficiary selection (8%) and recruitment (8%)
- Service delivery was particularly prone to abuse of function and maladministration by local authorities and the Zambia Police
- As pointed above, land licenses and land ownership were prone to different types of corruption, such as maladministration and fraud.
- Reports concerning beneficiary selection mainly addressed abuse of function within public programs such as the Constituency Development Fund, Social Cash Transfer, the Farmers Input Support Program, and Cash for Work
- Recruitment corruption was primarily reported in the education and health sector.

ALAC 2024 performance

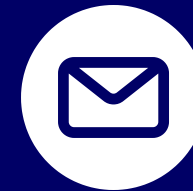
- Two thirds of all reports received by ALAC were corruption reports
- Categories of cases where ALAC was comparatively more successful in referring them to authorities and LEAs include, in decreasing order, beneficiary selection, CDF, embezzlement, local authorities, service delivery, and abuse of function
- Categories of cases where ALAC is experiencing a stronger backlog of cases include, in decreasing order, issuing a license, maladministration, land ownership/registration, fraud, and local authorities
- Categories of cases with the highest rate of reports rejected due to insufficient evidence were reports on recruitment corruption and reports against the Ministry of Education.
- The TAGs played an instrumental role in enabling citizens to report corruption concerning local authorities, maladministration, abuse of function, embezzlement and report wrongdoing in beneficiary selection.



<https://tizambia.org.zm>



+260 211 293 649
+260 973 683 431
+260 955 504 535



info@tizambia.org.zm



128 Mwambula Road,
Jesmondine, Lusaka,
Zambia