



TRANSPARENCY  
INTERNATIONAL  
ZAMBIA

**POLICY RECOMMENDATIONS  
FOR ADDRESSING  
LAND CORRUPTION IN ZAMBIA**

October 2024

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## 1 - INTRODUCTION AND BACKGROUND

Transparency International Zambia (TI-Z) in Partnership with Transparency International Secretariat (TI-S) has been implementing the Land and Corruption in Africa Phase II (2021–2025) project. The aim of the project is to ensure that corrupt practices in land administration and land deals are addressed contributing to improved livelihoods.

Zambia has a dual land tenure system namely leasehold tenure on state land administered by the State and customary tenure on customary land administered by chiefs or traditional leaders. Occurrences of corruption in the land sector have been rampant for a long time and this has been acknowledged widely by government and stakeholders. Some aggregate indices that cover various types of corruption, including land corruption, are the Corruption Perception Index (CPI) which shows that Zambia scored 33% for the period 2021/ 2022 in relation to access to public services.<sup>1</sup> The prevalence of a bribery experience according to the Zambia Bribe Payers Index in 2022, stood at 62.6%.<sup>2</sup> Some selected reported incidences of corruption associated with land are as follows:

▶ In 2024, the Minister of Lands and Natural Resources revoked the land agency of Kafue Town Council following reports of illegal land allocations in the Lusaka South National Park. The Minister stated that the Kafue Town Council had been allocating

land fraudulently to developers without adhering to the stipulated procedures. He disclosed that the Council used a site plan acquired fraudulently to carry out these allocations.<sup>3</sup>

▶ In 2024, the Anti-Corruption Commission arrested a Senior Planner at the Northern Provincial Planning Unit and a Lands Officer at the Ministry of Lands for abuse of authority of office. The duo did abuse the authority of the office in the manner they selected some members of the public as beneficiaries of a named property, an act which was prejudicial to the rights or interests of the Government.<sup>4</sup>

▶ In 2023, Chief Chiwala of the Lamba people, called for the intervention of the Anti-Corruption Commission (ACC) to investigate and prosecute Ministry of Lands workers reportedly involved in illicit land deals. The chief stated that officials at the Ministry of Lands had even gone as far as forging land documents and irregularly issuing land titles.<sup>5</sup>

▶ In 2022, the Minister of Lands and Natural Resources, said he was saddened with the continued reports of corruption in the administration of land. The Minister said he had been receiving reports from different parts of the country on how title deeds and multiple allocation of land has been administered in corrupt ways.<sup>6</sup>

### Footnotes

[1] <https://www.transparency.org/en/countries/zambia>

[2] ACC, TI-Z (2023), 2022 Zambia Bribe Payers Index (ZBPI) Survey Report, Anti Corruption & Transparency International Zambia

[3] <https://www.lusakatimes.com/2024/07/09/lands-minister-elijah-muchima-revokes-kafue-town-councils-land-agency/>

[4] [www.acc.gov.zm](http://www.acc.gov.zm)

[5] <https://www.lusakatimes.com/2023/10/24/chief-chiwala-calls-for-acc-investigation-into-alleged-ministry-of-lands-corruption/>

[6] <https://www.lusakatimes.com/2022/08/16/corruption-in-land-administration-irks-govt/>

## 2 - LAND CORRUPTION RISK FACTORS

Some common risks and forms of corruption in the land sector are highlighted in table 1 below.

Table 1: Risks and forms of corruption in the land sector<sup>7</sup>

AREA	RISK FACTORS	FORM
<b>LAND ADMINISTRATION</b>	<ul style="list-style-type: none"> <li>• Inadequate land laws and procedures.</li> <li>• Excessive or unpublished fees for land services.</li> <li>• Lack of recognition of land uses and rights.</li> <li>• Under-developed and non-transparent land registration systems.</li> <li>• Absence of up-to-date and accurate land records.</li> <li>• Existence of multiple land management authorities.</li> <li>• Irregular practices in the collection of land taxes.</li> <li>• Limited accessibility of services.</li> <li>• Lack of effective complaint, grievance and independent oversight mechanisms.</li> <li>• Absence of a code of conduct.</li> </ul>	<ul style="list-style-type: none"> <li>• Bribery of land administration officials and law enforcement authorities.</li> <li>• Fraud and production of false land claim documentation.</li> </ul>
<b>CUSTOMARY LAND TENURE</b>	<ul style="list-style-type: none"> <li>• Lack of legal recognition and delineation of customary land.</li> <li>• Traditional practices of payments and exchanges.</li> <li>• Opaque systems, absence of outside control and lack of clarity in allocation of land.</li> <li>• Monetarisation and speculation cm land sales.</li> </ul>	<ul style="list-style-type: none"> <li>• Abuse of power by chiefs.</li> <li>• Conversion of property and capture of revenues by chiefs and influential people.</li> <li>• National institutions and business interests override local land rights.</li> </ul>
<b>MANAGEMENT OF STATE-OWNED LAND</b>	<ul style="list-style-type: none"> <li>• Lack of inventory, delineation and management of state land.</li> <li>• Irregularity of land prices for disposal and acquisition.</li> <li>• Unclear institutional responsibilities and decision mechanisms.</li> <li>• Absence or lack of clarity of regulations for leasing land or exercising eminent domain.</li> <li>• Lack of effective complaint, grievance and independent oversight mechanisms.</li> </ul>	<ul style="list-style-type: none"> <li>• Bribery of government officials to obtain public land at a fraction of market value.</li> <li>• Manipulation of compulsory land acquisition and compensation processes by government officials and investors.</li> <li>• Irregular conversion of property and land classification status by government officials.</li> </ul>

[7] Transparency International (2011). Corruption in the Land Sector.

Table 1: Risks and forms of corruption in the land sector

AREA	RISK FACTORS	FORM
<b>LAND USE PLANNING, CONVERSION AND INVESTMENTS</b>	<ul style="list-style-type: none"> <li>• Lack of transparency of planning processes and land allocation procedures.</li> <li>• Opaque, slow and bureaucratic processes for issuing building development permits.</li> <li>• Unclear land use and property rights.</li> <li>• Lack of effective complaint, grievance, independent oversight and enforcement mechanisms.</li> <li>• Lack of an independent media.</li> </ul>	<ul style="list-style-type: none"> <li>• Capture of rents and profits originating from land conversion and re-zoning by government officials and investors.</li> <li>• Abuse of government officials' discretionary power to propose real estate and land developments that increase the value of her/his personal property.</li> <li>• Acquisition of land through state capture and/or by investors and developers having received insider information from government officials.</li> <li>• Bribery of government officials by investors and/or developers.</li> </ul>
<b>PAYMENTS FOR ENVIRONMENTAL SERVICES</b>	<ul style="list-style-type: none"> <li>• Lack of legal recognition of tenure rights.</li> <li>• Lack of recognition of protected areas and lands reserved for environmental protection.</li> <li>• Opaque, slow and bureaucratic payment systems.</li> </ul>	<ul style="list-style-type: none"> <li>• Capture of funds by developers, investors and government officials.</li> <li>• Acquisition of parcels eligible for payments by developers, investors, and government officials.</li> </ul>

### 3 - LEGISLATION AND INSTITUTIONAL FRAMEWORK

The legal, policy and institutional framework in Zambia does not address land corruption specifically but deals with corruption in general. However, the national lands policy embraces principles such as good governance, equity, transparency and accountability which would indirectly assist in dealing with land corruption. However, such principles are yet to be implemented through enactment or amendments to the land governance legislation.

The Government of Zambia launched the National Policy on Anti-Corruption in 2009 and updated it in 2023 to help coordinate and scale up the fight against corruption in

general. The main legislation guiding the implementation of this Policy is the Anti-Corruption Act No. 3 of 2012.

The Public Interest Disclosure (Protection of Whistleblowers) Act No. 4 of 2010 provides for the protection of whistle blowers in Zambia. The Act encourages people who observe any acts adverse to the interest of the public to report such acts by getting in touch with law enforcement agencies in order to preserve the public interest.

Section 9 (1) of the Lands Act provides that a person shall not without lawful authority occupy or continue to occupy vacant land. This would, in a way, help prevent illegal occupation of land through corrupt means.

The Urban and Regional Planning Act of 2015 provides for a procedure for conversion of land use of property which calls for newspaper and bill board adverts to foster transparency and allows for the public to object to proposed change of use during stipulated time. This can help to curb corrupt change of land use.

## 4 - BEST PRACTICES AND INITIATIVES

In Zambia, there is an apparent absence of local best practices or initiatives designed to specifically deal with land corruption. For detection and prevention of corruption in general, the Anti Corruption commission has been facilitating the mainstreaming measures in the routine business of public institutions such as the Ministry of Lands and Natural Resources through the establishment of Integrity Committees and the launch of the public service code of ethics aimed at promoting ethical conduct in the public service. Further, Government mandated all public institutions to develop Service Charters to enhance efficiency, transparency and accountability in public service delivery. Despite the measures, land corruption remains rampant.

To help detect corruption in general (including land corruption) the Anti-Corruption Commission developed an Online Anonymous Whistle Blower System that allows people to report corruption online and remain anonymous. In this system, the whistle blower can use their gadget in the comfort of their home or office and make any report to the Anti-Corruption Commission on any suspected corrupt practices. Other international best practi-

ces and initiatives for dealing with land corruption are described in box 1 below.

*Box 1: Best practices for addressing land corruption*<sup>8</sup>



### INCREASE TRANSPARENCY

Transparency can be achieved by full public disclosure of by allowing public access to land administration documents. Information on how decisions are made in land allocation should also be available to the public.



### ENSURE ACCOUNTABILITY

One way to increase accountability is by including strong and effective oversight institutions, such as parliamentary committees, anti-corruption commissions and law enforcement bodies. Ensuring accountability also requires strong institutional accountability measures, like financial inspections and independent audits of land surveyors, A third form of accountability is social accountability, understood as the capacity of citizens to hold governments accountable.



### ORGANISE LAND ADMINISTRATION

Good practice in the reform of land administration is to simplify the administrative system, reducing steps and preventing opportunities for corruption.



### ENSURE PARTICIPATION

Affected population should be involved in the identification of land parcels and their demarcation. Hotlines and mailboxes can be used as anonymous methods of reporting corruption and lodging formal complaints.



### IMPROVE HUMAN RESOURCES MANAGEMENT

by producing and disseminating institutional codes of conduct and ethics.

[8] Zuniga, N. (2018). Land Corruption Topic Guide, Transparency International.

*Box 1: Best practices for addressing land corruption*



### TECHNOLOGY

The Urban and Regional Planning Act of 2015 provides for a procedure for conversion of land use of property which calls for newspaper and bill board adverts to foster transparency and allows for the public to object to proposed change of use during stipulated time. This can help to curb corrupt change of land use.



### COMPREHENSIVE LEGAL AND INSTITUTIONAL FRAMEWORKS

Land legislation should be accompanied by anti-corruption legislation with clear definitions of corruption and what the sanctions for corrupt actions are.

tions already submitted to management, and may or may not conduct interviews. Councils sometimes rely on payslips or bank statements in assessing land applicant's ability to develop the land. Such an unclear selection process is open to abuse and corruption as evidenced by several reported incidences of corruption in local councils.

The Zambian Constitution of 2016 introduced a lands commission as responsible for land alienation on behalf of the President. Article 254(2) of the Constitution of the Republic of Zambia provides that *"the President may, through the Lands Commission, alienate land to citizens and non-citizens, as prescribed."* However, eight years after the constitution was amended, the Lands Act has not been amended to reflect the provision of the constitution and therefore the status quo still remains, i.e. the lands commissioner's discretionary power in the allocation of land have remained the same and still prone to corruption. The gap in the Lands Act is that it does not provide comprehensive provisions on land allocation and the commissioner of lands instead relies on the non-binding Administrative Circular of 1985. Another gap identified in the Lands Act is the lack of clear guidance and transparent mechanisms for protection, use, allocation and disposal of public land and therefore such land is often susceptible to encroachment, abuse and corrupt allocation at the expense of sustainable development.

The National Land Policy provides for allocation of 50% of available land to women. However, the gap is that this policy provision has not been supported with amendments to relevant Acts and thus leaves women vulnerable to corrupt practices in form of sextortion for example.

## 5 - GAPS IN THE LEGAL, POLICY, AND INSTITUTIONAL FRAMEWORKS

### 5.1 Lack of Comprehensive and Transparent Land Allocation Processes

There is apparent discretion in the allocation of land by the Commissioner of Lands and this is prone to corruption. Gaps in the Lands Act and the Urban and Regional Planning Act are that the pieces of legislation do not provide for comprehensive provisions on land allocation and the commissioner of lands instead relies on the Administrative Circular of 1985. This circular provides for local councils to invite potential applicants for available land. Councils may decide whether or not to advertise in the press, on their notice boards or select from applica-

## ➤ 5.2 Under-Developed Land Registration System

The Lands and Deeds Registry Act has a number of gaps including:

1. Lack of provisions for mandatory decentralization of deeds registries;
2. Lack of integration of the existing township and municipal registries established under the Urban and Regional Planning Act makes the lands register incomplete;
3. Out-dated and lacking provisions to enhance ease of doing business through the use of modern ICT based methodologies for land registration.

Certificates of title at the Ministry of Lands and Natural Resources are only issued in a few provincial centres in the Country. This results in increased workload for staff and thus breeding grounds for corrupt practices to get the job done quickly. Further, manual registration systems in councils are prone to errors and abuse.

## ➤ 5.3 Inadequate Land Repossession Procedures on State Land

Land can be re-entered or repossessed by the State in line with section 13(1) of the Lands Act. The gap is that the Act is silent on how the notice of re-entry ought to be served. Delays or non-delivery of a re-entry notice by the Ministry, to a land owner, leaves room for the process to be corruptly abused and land 'grabbed' on account of 'lapse' of the three months' notice within which a property owner should have made representations as to why their property should not be repossessed.

## ➤ 5.4 Land Tenure Insecurity in Customary Areas and Urban Informal Settlements

The primary legal instrument to protect the customary land rights of local communities in converting land from customary to leasehold tenure is the Lands (Customary Tenure) (Conversion) Regulations (2006) to the Lands Act. A chief and local authority are required to confirm, through signed written consent that the land is not being used for other purposes; that the members of the community were consulted; and that the investor's interest does not conflict with the needs, interests and rights of local land users.

The gap is that the requirement for consent of a chief for conversion of land from customary tenure to leasehold tenure does not require proof of community consultations and this leaves room for abuse and corruption in land conversions. Further, the absence of records to indicate the extent of conversions contributes to apprehension among customary authorities over their shrinking sphere of control.

Absence of suitable documentation for legal ownership and protection of various categories of rights makes customary land tenure insecure and prone to corruption in form of land grabs. Although a few chiefdoms such as Chamuka in central province have adopted fit-for-purpose land administration initiatives supported by UN-Habitat in which customary land occupants are issued with customary land occupancy certificates, there are no comprehensive guidelines or legal framework for the registration of land rights under customary tenure.



The majority of the urban population in Zambia lives in informal or unplanned settlements. Landholdings in informal urban settlements are insecure because they are subject to acquisition for planned urban development. The Urban and Regional Planning Act provides for issuance of occupancy licenses and certificates of Titles in such areas. However, the weakness or gap is in the implementation of the Act which results in a slow pace at which occupancy licenses and certificates of title are issued due to insufficient capacity and financial constraints by local councils. Further, fees associated with obtaining these documents are not affordable by many occupants and thus remain prone to corrupt land grabs due to tenure insecurity.

### ➤ 5.5 Gaps to National Lands Policy

The National Lands Policy is based on principles of good governance, transparency accountability and equity. However, it does not explicitly provide for any policy guidelines on the detection or prevention of corruption in the land sector.

### ➤ 5.6 Existence of Multiple Land Administration Authorities

The institutional framework for land governance is anchored in the Ministry responsible for Lands which is the principal and performs the functions of policy guidance to all institutions involved in land alienation and the general public, land identification land allocation, land survey, land registration, dispute resolutions and collections of land related fees and other charges. However, there are also other Government institutions including local councils which perform land administration

and public land management functions. This structural set up means that the key functions of land administration and management are spread across many institutions and this renders the land administration and management of land ineffective and prone to corruption.

## 6 - RECOMMENDATIONS

The following are the proposed policy recommendations for addressing the gaps highlighted in the report.

➤ **Policy Objective 1: Enhance good governance, transparency, equity and accountability in land allocation by the Ministry of Lands and Natural Resources and local councils.**

### POLICY MEASURES

*Amend the legal framework to:*

- 1** Implement a gender sensitive simple, equitable, transparent and cost-effective land allocation system on state land;
- 2** Provide for the functions of the Lands Commission established under the constitution of 2016 and define the functions of the Commissioner of Lands to improve accountability and diminish discretion in the alienation of land;
- 3** Strengthen and incorporate the provisions of the land administration circular of 1985 on land allocation into the Lands Act;
- 4** Ensure that committees on land allocation at both central and local government levels do include representation from the anti-corruption commission, community leaders, civil society organisations (CSOs), non-governmental organisations (NGOs) and

other non-state actors whose key mandate is to fight corruption;

- 5** Ensure that information about land such as availability, location, type and allocation procedures is made easily available to the public by all land allocation authorities to enhance transparency;
- 6** Publish the details of all land applicants that the Ministry of Lands and Natural Resources or local councils intends to allocate land to, in order to provide an opportunity for members of the public, NGOs, CSOs and other non-state actors to scrutinise such lists and raise objects where corrupt practices are suspected;
- 7** Ensure that minutes of meetings for which land was allocated are signed off and properly filed for possible scrutiny by oversight institutions and foster accountability;
- 8** Ensure that for all land allocated, persons responsible for allocation should sign a binding declaration that the allocation process was done impartially devoid of corruption and that they would be held accountable for their actions;
- 9** Ensure that land is only allocated after it has been surveyed to avoid encroachments resulting from corrupt practices;
- 10** Ensure that the identity of persons or organisations to whom land is to be allocated to are verified by the Department of National Registration and Patents and Companies Registration Authority (PACRA) or Registrar of Societies to ensure that land is not allocated to fictitious entities or proxies;
- 11** Decentralize land allocation systems to the appropriate structures on state land;

- 12** Establish clear and transparent mechanisms for allocation and disposal of public land.

*Institutions should:*

- 13** Abolish the practice in local councils that allows council members to make payments to themselves in form of land;
- 14** Ensure that the auditor general's office conducts regular audits on land allocation, registration and titling in the Ministry of Lands and Natural Resources and local councils.

➤ **Policy Objective 2: Enhance the cadastral survey services to curb encroachments and double allocation of land.**

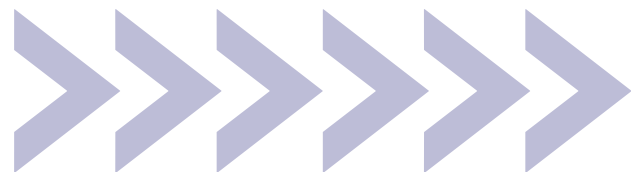
#### **POLICY MEASURES**

*Amend the legal framework to:*

- 1** Promote fit-for-purpose land survey approaches to ensure efficient, cost effective and timely cadastral surveys to avoid delays and subsequent corruption in unplanned or informal settlements;
- 2** Provide for community participatory approaches in undertaking land demarcations to enhance transparency;

*Government Survey Department should:*

- 3** Enhance coordination with local councils to ensure that procedural requirements of subdivision of land are adhered to.



➤ **Policy Objective 3:** Enhance the land registration system to prevent corruption.

**POLICY MEASURES**

*Amend the legal framework to:*

- 1 Simplify the land registration and titling processes to make them more efficient and less prone to corruption in both planned areas and unplanned settlements;
- 2 Compile and maintain an inventory of public land to curb corrupt land allocations;

*The Ministry of Lands and Natural Resources or Local Councils should:*

- 3 Decentralise land registration and titling services to all provinces of Zambia;
- 4 Intensify efforts for registration of eligible properties in planned areas and unplanned settlements;
- 5 Enhance the features of certificates of title to avoid forgeries;
- 6 Ensure the timely issuance of certificates of title in line with service charters;
- 7 Improve access to information on land rights and ownership on the land registers;
- 8 Ensure that land records and registries are up-to-date, efficient and effective to curb instances of land disputes on all land tenure categories.

➤ **Policy Objective 4:** Introduce or strengthen the computerised land administration and information systems.

**POLICY MEASURES**

*Amend the legal framework to:*

- 1 Make it mandatory for the lands and

deeds registries at local councils and the Ministry of Lands and Natural Resources to be computerised and integrated;

- 2 Strengthen the development and application of e-Governance in land administration and management;

*The Ministry of Lands and Natural Resources and Local Councils should:*

- 3 Ensure that a feature is created for public notification on computerised land administration systems to ensure that owners of land are automatically alerted via short text messaging system on mobile phones and email about any transactions on their land to help them track any suspicious activity;
- 4 Enhance the tracking systems on land administrations systems to ensure that members of the public, the anticorruption commission, CSOs, NGOs and other relevant institutions can track land applications, allocations and other functions to foster transparency and accountability;
- 5 Enhance the computerised administration systems to ensure that they are not open to abuse and manipulation by both users and IT personnel;
- 6 Enhance the mechanism for dissemination of statistics and information on land allocation;
- 7 Digitise all land records to maintain a robust land information management system without a possibility of erasing records;
- 8 Link and integrate land and property registries, between the Ministry of Lands and Natural Resources and local councils.

➤ **Policy Objective 5: Improve land tenure security on state land and customary land.**

**POLICY MEASURES**

*Amend the legal framework to:*

- 1 Promulgate guidelines, build capacities and provide for chiefdoms to document land occupancy rights on customary land including land parcel boundaries using fit-for-purpose land administration approaches to enhance tenure security and curb corruption;
- 2 Establish procedures for effective community consultation and participation by all those materially affected by decisions of chiefs to allocate land to investors and other players;
- 3 Ensure that conversions of land from customary tenure to leasehold tenure are based on principles of participatory consultation, transparency and fair compensation;

*The Ministry of Lands and Natural Resources or Local Councils should:*

- 4 Sensitise Chiefs on the risks of allocating large tracts of land to non-Zambians.

➤ **Policy Objective 6: Harmonise the legal or policy frameworks and institutions responsible for land administration, anti-corruption and law enforcement.**

**POLICY MEASURES**

*Amend the legal framework to:*

- 1 Ensure that various statutes on land governance should be consolidated into one Lands Act to ensure that all aspects of land administration are regulated under one statute to avoid duplicity,

- inconsistencies and contradictions;
- 2 Restructure the network of institutions dealing with land administration and management and transfer all oversight land administration functions to the Ministry of Lands and Natural Resources;
- 3 Make the land governance legal, policy and institutional framework consistent with the principles of good governance, transparency, equity and accountability as promulgated by the National Lands Policy and Anti-Corruption policy;
- 4 The Ministry of Lands and Natural Resources should decentralise land administration services in line with the national decentralisation policy for state land;

*Institutions responsible for land administration should:*

- 5 Develop and adhere to timelines set in service charters in the delivery of land administration services;
- 6 Engage with civil society organisations, user representatives and the broader public to improve services and endeavour to prevent corruption through transparent processes and decision-making;
- 7 Collaborate with the Anti-Corruption Commission in the implementation of international codes of conduct and global conventions and regulatory frameworks in the fight against land corruption;
- 8 Collaborate with the Anti-Corruption Commission to regularly review and monitor policy, legal and organisational frameworks to maintain their effectiveness;
- 9 Ensure that all the key land governance statutes are amended to make them

consistent with the principles of good governance, transparency, equity and accountability as promulgated by the National Lands Policy and Anti-Corruption policy;

- 10** Ensure that the legal framework on land data protection are harmonised with the Access to Information Act to ensure that there are no impediments to transparency in access to land information;
- 11** Ensure that the codes of conduct for valuation professionals and estate agents are adhered to in order to ensure that the public is protected against corrupt practices.

## 7 - CASE STUDIES

Some case studies that illustrate how land corruption was addressed are highlighted in the boxes below.

*Box 2: Case Study from Albania* <sup>9</sup>



### **INCREASING TRANSPARENCY: SUCCESSFUL EXPERIENCE IN ALBANIA**

Albania established a system to increase transparency in the process of transferring state public land to local governments. The local government must first present to the Council of Ministers a list of properties that they want to have transferred. The council will react with a preliminary decision including conditions and restrictions. The local government has a three-month period to appeal the decision. After that, the council will decide on the property transfer.

*Box 3: Case Study from Pakistan* <sup>10</sup>



### **ESTABLISHMENT OF COMPLAINTS MECHANISM: SUCCESSFUL EXPERIENCE IN PAKISTAN**

In 2013, the local government of Lahore, Pakistan, established a complaint mechanism within the land registry service, known for having significant problems with corruption and employee misconduct. With this mechanism, as part of completing official forms for land registry, citizens could opt to receive a text message or call to their personal phone to provide feedback. Citizens were encouraged to report problems of corruption and name the officials they dealt with, while keeping the information anonymous. The government used that information to map out sections where there were problems and began addressing them as soon as the programme was launched. About 1 million people were contacted through text messages and calls, and about 175,000 citizens responded to the survey. Of these, 6,000 reported corruption. The government acted on those complaints and produced investigative reports into those allegations.

[9] Zuniga, N. (2018). Land Corruption Topic Guide, Transparency International.

[10] Ibid



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