



# Assessing the Level of **Transparency** in Political Party Financing and the **Risk of Illicit Financing** in Zambia

**STUDY REPORT  
MAY 2025**



# **Final Study Report: Assessing the Level of Transparency in Political Party Financing and the Risk of Illicit Financing in Zambia**

## **Client**

BBC Media Action

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## EXECUTIVE SUMMARY

Corruption and unregulated political financing have the potential to undermine the integrity of elections. Therefore, promoting transparency in political financing and mitigating the risk of illicit financing of political parties are critical for democratic governance. Recognising the importance of political finance transparency in combating corruption, Article 7.3 of the United Nations Convention against Corruption (UNCAC) obligates state parties to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties. The African Union Convention on Preventing and Combating Corruption (AUPCC) also obligates state parties to adopt legislative and other measures to proscribe the use of funds acquired through illegal and corrupt practices to finance political parties, and incorporate the principle of transparency into the funding of political parties.

In Zambia, Article 60 of the Constitution provides for the regulation of political party finance, but Zambia has not enacted a law to operationalise this constitutional provision. Due to this lack of legislation, political parties in Zambia do not disclose their sources of funding and do not publish their financial reports for public scrutiny. To generate evidence for corrective action, Transparency International Zambia, with support from BBC Media Action through the Deepening Democracy Facility, conducted this study to investigate the level of transparency among Zambian political parties and assess the risk of illicit financing. This study employed a quantitative survey to provide initial results, followed by desk-based research to provide a deeper context for the quantitative results. The survey targeted 40 political parties and received responses from 28 parties between March and May 2025. Out of these 28 political parties, 57% participated in the 2021 General Elections, with 39% participating at the local government level and 36% participating at both the parliamentary and presidential levels.

The findings reveal a concerning picture of low transparency and accountability, coupled with

high risk of illicit financing. Only 25% of the political parties reported that they maintained detailed financial records and managed their political finances through commercial bank accounts. Meanwhile, 50% of the sampled political parties did not conduct due diligence on the source of financing before accepting donations, and an additional 64% accepted anonymous contributions. Furthermore, out of the 28 political parties, 75% reported receiving donations from foreign interests, including foreign governments, entities, and companies. The top sources of financing for the political parties in Zambia included funds from the party leadership, party membership, members of parliament, and donations from both local and foreign businesses.

It was also notable that the majority of the 28 political parties did not have adequate systems and policies in place to mitigate the risk of illicit financing, as over 53% did not have finance management manuals or policies, despite 50% reporting the presence of anti-corruption or integrity policies. The lack of due diligence on the sources of donations and acceptance of donations from companies participating in the public procurement process was attributed to limited access to beneficial ownership registers among political parties.

In light of these findings, Transparency International Zambia calls upon the Zambian Government to enact a political finance regulation law to enhance transparency and accountability among political parties in Zambia. There is also a need to strengthen oversight by requiring political parties to submit income and expenditure statements as part of their annual returns. Political Parties should strengthen financial management by developing financial management manuals and conducting financial transactions through designated commercial bank accounts. Furthermore, civil society and the media should support the reform process by intensifying scrutiny of political party funding, conducting investigations and studies on the management and sources of financing.

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# 1 - BACKGROUND

## 1.1 STANDARDS FOR INTEGRITY IN POLITICAL FINANCE

Globally, there is increasing evidence that corruption and unregulated donations are exerting undue influence on politics, thereby undermining the integrity of elections.<sup>1</sup> To protect democracy from corruption and undue influence, political finance must be transparent and originate from legitimate sources. This is because promoting such standards would close opportunities for covert, secretive or criminal actors, both foreign and domestic, from exerting undue political influence over public discourse and election outcomes.<sup>2</sup>

Transparency International (TI) envisions a political finance system in which voters know who funds political parties and candidates, all funding represents the legitimate interests of voters, and no funding creates undue advantage.<sup>2</sup> Transparency and Clean Money are the first two key principles in this TI Standard for Integrity in political finance, as the public has the right to know how money influences politics; since information on funding and expenditure provides essential context for making informed decisions at the ballot box. Further, transparency deters illicit interests from seeking to buy political influence and prevents the channelling of public funds to political parties.<sup>2</sup>

Political finance refers to the way in which

political parties and candidates raise and spend money for regular activities and election campaigns, and the political finance system used to regulate this financing.<sup>2</sup> In Africa, many countries continue to struggle with the regulation of political finance and campaign funding.<sup>3</sup> Consequently, it is difficult to deny that money plays a key role in the continent's political dynamics. In fact, the funding of political parties and candidates can have a more significant impact on the fairness of an electoral process than many other factors.<sup>1</sup> While many opposition political parties struggle to raise adequate funding for their electoral activities, ruling parties can extract resources from the state to fund their electoral campaigns and gain a political advantage over opponents.<sup>4</sup> These financing gaps can make it difficult for the opposition to convince (or even reach) the electorate with its messages, and it is challenging for traditionally marginalised groups, such as youths and women, to win elections.<sup>5</sup>

According to Transparency International's Clean Money Principle, political funding must voice the legitimate interests of voters. This means political finance must originate from legitimate sources and use legal channels. Key elements of this Clean Money Principle include verifying the sources of donations before accepting, refusing and returning suspicious or anonymous donations, declaring company beneficial ownership information when making donations, and restricting contributions from companies

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[1] International Institute for Democracy and Electoral Assistance (2014). Funding of Political Parties and Election Campaigns: A Handbook on Political Finance: Stockholm: International IDEA

[2] Transparency International (2024). Standards for Integrity in Political Finance: A Global Position Paper. <https://www.transparency.org/en/publications/standards-for-integrity-in-political-finance-global-policy-position>

[3] Electoral Institute of Sustainable Democracy in Africa (2023). The Balancing act between Campaign Finance, Money in Politics, and Public Resources in Elections. <https://www.eisa.org/the-balancing-act-between-campaign-finance-money-in-politics-and-public-resources-in-elections/>

[4] Sigman, R. (2023) 'Frontmatter', in Parties, Political Finance, and Governance in Africa: Extracting Money and Shaping States in Benin and Ghana. <https://www.cambridge.org/core/books/parties-political-finance-and-governance-in-africa/8631A198834AC99A094FB8EFBAA2A31#fndtn-information>

[5] Saffu, Y. (2003) 'The Funding of Political Parties and Election Campaigns in Africa', in Reginald Austin and Maja Tjernström (eds), Funding of Political Parties and Election Campaigns. Stockholm: International IDEA.

participating in public procurement, and banning donations from foreign interests.<sup>2</sup> In 2023, at least 64 countries across the world allowed anonymous donations, while nearly half of the 181 countries assessed did not require political finance to flow through banking systems.<sup>6</sup>

Transparency, above all, is the capacity to reveal what the public deserves to know but remains concealed. Full disclosure requires independent agencies that are equipped to verify compliance with rules and that the information disclosed is of good quality, accurate and timely. Key elements of the TI Transparency Principle include the keeping of detailed financial records and maintenance of designated bank accounts by political parties; reporting of both incomes and expenditures to oversight bodies; verification of annual financial reports; submission of special interim disclosures before Election Day; and publication of political finance reports from political parties.<sup>2</sup>

## 1.2 INTERNATIONAL CONVENTIONS AND COMMITMENTS

Recognising the importance of political finance transparency in combating corruption, Article 7.3 of the United Nations Convention against Corruption (UNCAC) obligates state parties to enhance transparency in the funding of candidacies for elected public office and, where applicable, the funding of political parties. Article 7.4 extends this commitment to the adoption, maintenance and strengthening of systems that promote transparency and prevent conflicts of interest. Further, the UN General Assembly

recognises that to prevent and combat corruption, countries must protect the integrity of the electoral process, promote its accountability to voters, promote transparency and impartiality in domestic electoral institutions and oversight mechanisms, and promote transparency in the funding of candidacies, political parties, and electoral campaigns.<sup>8</sup>

The African Union Convention on Preventing and Combating Corruption (AUPCC)<sup>9</sup> also obligates state parties to adopt legislative and other measures to proscribe the use of funds acquired through illegal and corrupt practices to finance political parties, and incorporate the principle of transparency into the funding of political parties. Furthermore, the Southern African Development Community (SADC) Protocol against Corruption defines corruption as the diversion of public funds by public officials for the benefit of third parties and for uses other than the intended purposes.<sup>10</sup>

## 1.3 LEGAL GAPS AND IMPLEMENTATION CHALLENGES

Globally, over 190 countries have committed to enhancing transparency in the funding of candidacies for elected public office and, where applicable, the funding of political parties, through Article 7.3 of the UNCAC and the 2021 Political Declaration of the United Nations Special Session of the General Assembly against corruption. However, relatively few countries are acting on these commitments. An expert survey of 109 countries in 2021 found that one in three

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[6] International IDEA. (2024). Political Finance Database. <https://www.idea.int/data-tools/data/political-finance-database>

[7] United Nations Convention against Corruption.

[https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026\\_E.pdf](https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf)

[8] United Nations General Assembly (7<sup>th</sup> June 2021). Our common commitment to effectively addressing challenges and implementing measures to prevent and combat corruption and strengthen international cooperation, <https://undocs.org/A/RES/S-32/1>

[9] The African Union Convention on Preventing and Combating Corruption (AUPCC).

[https://au.int/sites/default/files/treaties/36382-treaty-0028 -  
african union convention on preventing and combating corruption e.pdf](https://au.int/sites/default/files/treaties/36382-treaty-0028_-_african_union_convention_on_preventing_and_combating_corruption_e.pdf)

[10] SADC Protocol Against Corruption. <https://www.sadc.int/document/protocol-against-corruption-2001>

countries did not mandate the publication of financial reports, while only 36 countries published details of donations, including information on timing, amounts, and identification of donors online.<sup>11</sup>

In Africa, while political campaigns are costly, few African countries provide public funding to political parties; therefore, most political parties rely on private funding or donations. Only 9 countries (20%) of the 44 with available data in Africa place limits on campaign donations, and 10 countries out of 46 (22%) place limits on the spending of political parties.<sup>12</sup> Most private funding comes from the 4 primary traditional sources. These include party membership fees, corporate donations, foreign donations, and self-funding,<sup>13</sup> especially by wealthy political leaders and candidates.

Several African Countries have passed laws to improve financial regulatory processes, including the introduction of systems for political party funding and giving local enforcement agencies the authority to implement such acts. Cameroon, Kenya, Nigeria, Rwanda and Senegal, for example, criminalise donations to political parties from foreign donors but do not provide public funding for political activities. In Kenya, section 28 (1) of the Political Parties Act 2011, which was revised in 2015, forbids parties from accepting funds from non-citizens.<sup>12</sup>

Nigeria's primary political finance oversight agency, the Independent National Electoral Commission (INEC), is legally required to report to the National Assembly when a political party fails to keep and report financial accounts properly. However, the National Assembly does

not have sufficient legal authority to reprimand the INEC if it fails to do so. The INEC has not performed these constitutional functions since the return of democratic governance in 1999; nor has the National Assembly been proactive in rebuking such inaction. Consequently, shirking donation bans is standard practice.<sup>14</sup>

In South Africa, the enacted Political Party Funding Act 6 of 2018<sup>15</sup> limits the amount of donations received each year and forbids donations from foreign governments and foreign government agencies. However, the law allows political parties to receive donations from other foreign entities, provided the funding is for the training or skills development of a party member or for policy development by the party.<sup>13</sup> The law also provides for public funding of represented political parties as well as administrative fines and penalties for non-compliance.<sup>15</sup>

In Zambia, Article 60 of the Constitution<sup>16</sup> provides for the establishment and management of a Political Parties' Fund, the submission of audited accounts to foster accountability, the declaration of sources of funds, and the regulation of the maximum amount of expenditure for campaigns and elections. However, Zambia has not enacted a law to operationalize these constitutional provisions. This is partly because stakeholders disagree on the selection criteria for funding through the Political Parties Fund, as many political parties have no representation in parliament. Further, the government is wary of the financial burden of funding political parties.<sup>17</sup>

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[11] Global Data Barometer (GDB). (2022). Political Integrity Module. Available at: <https://globaldatabarometer.org/open-data/>

[12] International IDEA (2018). Political Finance Database, <https://www.idea.int/data-tools/data/political-finance-database/>,

[13] International IDEA (2019). The Integrity of Political Finance Systems in Africa: Tackling Political Corruption. International IDEA Policy Paper No. 20.

<https://www.idea.int/sites/default/files/publications/integrity-of-political-finance-systems-in-africa.pdf>

[14] Ukase, P. I., (2016). Political parties and election/campaign financing in Nigeria: interrogating the 2015 general elections. Global Journal of Human-Social Science: Political Science, 4/16,

[https://globaljournals.org/GJHSS\\_Volume16/2-Political-Parties-and-Election-Campaign.pdf](https://globaljournals.org/GJHSS_Volume16/2-Political-Parties-and-Election-Campaign.pdf)

[15] Political Party Funding Act 6 of 2018. <https://www.gov.za/documents/acts/political-party-funding-act-6-2018-english-setswana-23-jan-2019>

[16] Constitution of Zambia (Amendment) Act No 1 of 2016. Available at <https://www.parliament.gov.zm/node/4831>

[17] <https://uncaccoalition.org/uncacparallelreportzambia/>

Due to this lack of substantive legislation, political parties in Zambia do not disclose their sources of funding and do not publish their financial reports for public scrutiny. In recent years, the Drug Enforcement Commission (DEC) and other law enforcement agencies have attempted to investigate political parties to establish their sources of funding; however, these investigations have proven challenging due to the lack of relevant legislation.<sup>17</sup> Zambia currently has no bans on donations to political parties from foreign interests, corporations or even corporations with public contracts.<sup>18</sup>

## 1.4 THE RESPONSIBILITY OF POLITICAL PARTIES

The relationship between money and politics in democracies is a key concern for policymakers, civil society and the public,<sup>19</sup> as unregulated funding of political parties can allow for undue influence and even criminal influence on politics and policymaking.<sup>2</sup> The principal-agent model presents a framework for understanding this policy problem from both the policy implementation and public policy-making perspectives. Essentially, the people, as the principals, support political parties, as the agents, to represent their interests.<sup>20</sup> Therefore, there arises a principal-agent problem when illicit funding of political parties leads to conflict of interest among political parties, in such a way

that the interest of the people is no longer a priority.

The illicit funding of political parties and corruption are a result of information asymmetry, as the people have limited information on the behaviour of political parties and candidates.<sup>21</sup> It therefore follows that transparency, which refers to both the degree of openness in decision-making processes and the extent of disclosure of interactions that could influence those decisions,<sup>22</sup> is a potential solution to this agency problem. Transparency in the funding of political parties can help to reduce conflicts of interest and corruption, thereby strengthening the integrity of political parties and elections.<sup>23</sup>

Despite the lack of domestication of these international instruments in Zambia, as evidenced by the lack of substantive legislation, political parties have the responsibility to ensure that they remain unencumbered by the influence of political donors and to avoid corruption and illicit sources of funding. Although political parties are not legally required to disclose their sources of financing in Zambia or publish their financial reports for public scrutiny, they can promote transparency and the clean money principles as measures to mitigate the risk of corruption and illicit funding, acting as ethical agents of the people. The purpose of this study is to investigate the level of transparency among Zambian political parties and to assess the risk of illicit financing.

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[18] International IDEA (2025). Political Finance Database: Zambia. [https://www.idea.int/data-tools/data/country?country=249&database\\_theme=302](https://www.idea.int/data-tools/data/country?country=249&database_theme=302)

[19] International IDEA (2019). The Integrity of Political Finance Systems in Africa: Tackling Political Corruption. <https://www.idea.int/sites/default/files/publications/integrity-of-political-finance-systems-in-africa.pdf>

[20] Lane, J. (2013) The Principal-Agent Approach to Politics: Policy Implementation and Public Policy-Making. *Open Journal of Political Science*, 3, 85-89. <https://www.scirp.org/journal/paperinformation?paperid=30539>

[21] Anderson E. Sarah, Buntaine T. Mark, and Zhang Bing. 2019. "Non-Governmental Monitoring of Local Governments Increases Compliance with Central Mandates: A National-Scale Field Experiment in China. *American Journal of Political Science*. Vol. 63 (3) p.626-643

[22] Hellman J. and Kaufmann D. (2001). Confronting the Challenge of State Capture in Transition Economies. <https://www.elibrary.imf.org/view/journals/022/0038/003/article-A010-en.xml?ArticleTabs=fulltext>

[23] Transparency International (2023). Transparency of the funding of candidates and political parties. <https://www.transparency.org/en/publications/transparency-of-funding-candidates-and-political-parties>



## 2 - RESEARCH OBJECTIVES

1. Assess the level of transparency and accountability among political parties in Zambia regarding the management of political party funds.
2. Assess the current efforts and policies of political parties aimed at mitigating the risk of illicit financing.
3. Investigate the sources of funding for political parties in Zambia and assess the risk of illicit financing.

## 3 - METHODOLOGY

This study employed a quantitative survey to provide initial results, followed by desk-based research to provide a deeper context for the quantitative results. This approach enabled a deeper understanding of the quantitative results by drawing on information from media articles, research studies, relevant policies, laws, and other sources.

### 3.1 POLITICAL PARTY SURVEY

The survey purposively targeted 40 political parties that participated in the National Democratic Institute (NDI) funded Zambia Political Accountability and Leadership (ZPAL) Project, implemented by Transparency International Zambia. These included the 16 political parties that fielded presidential candidates in the 2021 general elections (see [Appendix A](#)). In Zambia's majoritarian electoral system, the dominance of larger political parties implies that smaller parties are less likely to win elections.<sup>24</sup> Therefore, given the study's aim to assess the risk of illicit financing, a phenomenon that is prevalent among larger political parties, the targeting of larger and more established political parties focused the study on participants with the highest risk.

### 3.2 MEASURE OF TRANSPARENCY AND THE RISK OF ILLICIT FINANCING

In following Transparency International's Standards for Integrity in Political Finance,<sup>2</sup> the study utilised the elements of the Transparency and Clean Money Principles to develop indicators that measure transparency and the risk of illicit funding. The table below presents the elements of these two indicators, used to develop appropriate questions.

**Table 1: Transparency and Risk of Illicit Financing Measures**

TRANSPARENCY PRINCIPLE	CLEAN MONEY PRINCIPLE
Records Keeping	Due Diligence and Know-Your-Donor
Use of Bank Account	No Anonymous Donations
Reporting to Oversight Entity	Request for Beneficial Ownership Information for Corporate Donations
Submission of Special Disclosures Before Elections	No Donations from companies participating in public procurement
Publication of financial accounts/statements for voter access	No Donations from foreign Interests

In terms of computation, the transparency indicator ranges from 0 (very low transparency) to 5 (very high transparency). It increases with the number of elements present in a particular political party, as per the Transparency Principle.

[24] Lijphart, A. 2012. Patterns of democracy: government forms and performance in thirty-six countries. Rev. 20d ed. New Haven, US: Yale University Press.

However, the risk of illicit financing indicator ranges from 0 (very low risk) to 5 (very high risk). It decreases with the number of elements present in a particular political party, in accordance with the Clean Money Principle.

### **3.3 DATA COLLECTION**

Between March and May 2025, Transparency International Zambia (TI-Z) wrote letters to 40 political parties, requesting that they provide contact information for their officials to participate in the study. Following the collection of this information, TI-Z conducted face-to-face interviews with the political officials to administer the questionnaire. The face-to-face interviews were preferred as they increased data quality through the explanation of questions by the data collectors. However, the data collectors also administered an electronic version of the survey to some respondents who were hard to reach.

### **3.4 DATA ANALYSIS**

The researchers entered the data into STATA for descriptive analysis, which included generating the transparency and risk of illicit financing scores for each political party. Thereafter, the researchers used these measures to create visualisations and tables regarding the characteristics of the political parties. The results demonstrated an association between the level of transparency and the risk of illicit financing, as well as the characteristics of political parties that may influence both variables. Once the quantitative analysis was completed, the researchers conducted comprehensive desk-based research to provide a deeper context for the results.

### **3.5 RISKS MITIGATION AND LIMITATIONS**

This sampling approach minimised potential non-responses among the political party respondents, as the targeted 40 political parties comprised parties that TI-Z had previously engaged with and were thus familiar with the importance of political party integrity and the regulation of political party financing. The study, however, relied on self-reported information and hence did not adequately control for response bias. Despite this limitation, it is notable that self-reported data has become the global standard for collecting sensitive information from political parties.<sup>25</sup>

### **3.6 ETHICAL CONSIDERATIONS**

The questionnaire included a consent form that outlined the study's objectives to ensure subjects understood the research purpose. The researchers also presented the information collected from the survey in an aggregate manner, and thus did not attribute any particular response to a specific respondent or political party. Further, the participation of each subject in this research was voluntary, as the respondents reserved the right to withdraw from the study at any time during the interview or to choose not to answer any or all questions. Finally, the researchers ensured that they did not collect any personal information about the respondents, focusing instead on the characteristics of the political party. They also ensured that individual responses provided by the political parties were strictly confidential.

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[25] Wahman, M. (2023). The Cost of Politics in Zambia.

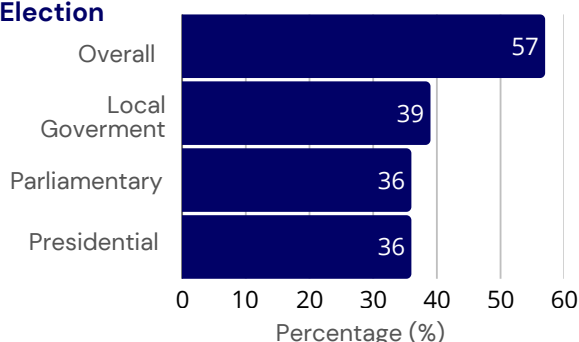
## 4 - FINDINGS

During the period from March to May 2025, 28 out of the targeted 40 political parties provided information to Transparency International Zambia on the state of transparency, accountability, and the risk of illicit financing within their political parties. This section presents the findings from the analysis of this information, as well as desk-based research used to provide deeper context to the findings.

### 4.1 POLITICAL PARTY CHARACTERISTICS

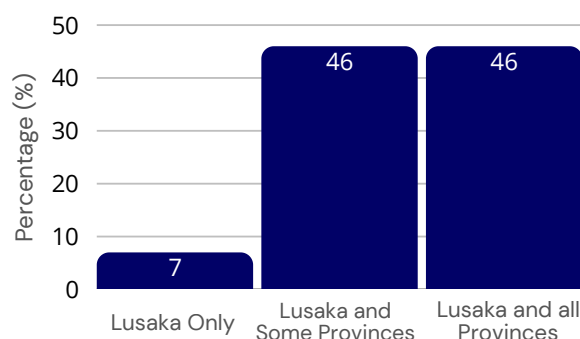
**Participation in the 2021 General Elections:** The majority of the 28 political parties sampled (57%) held conventions and participated in the 2021 General Elections, with 39% participating at the local government level and 36% at both the parliamentary and presidential levels. The presidential elections were the most contested, with 16 presidential candidates running for election,<sup>26</sup> while 21 political parties, as well as independent candidates, participated at the parliamentary level.<sup>27</sup> Following the elections, only 3 political parties won seats in parliament, while 13 members of parliament won as independents.<sup>28</sup> **Figure 1** presents the participation of the sampled political parties in the 2021 general elections.

**Figure 1: Participation in the 2021 General Election**



**Distribution of Party Leadership:** The majority of the sampled political parties were larger and more established, as they had established political party structures across the country. Only 7% had leadership only in Lusaka Province, while 92% had either leadership in Lusaka and some provinces across the country, or leadership in Lusaka and all provinces across the country. **Figure 2** presents the distribution of leadership of the sampled political party.

**Figure 2: Distribution of Political Party Leadership across the Country**



Further analysis revealed that the average years of existence for the political parties with leadership in Lusaka only were 8 years. In comparison, those with leadership in Lusaka and all Provinces had an average of more than 17 years. This means that older political parties tend to have more distributed leadership structures as compared to newer political parties. The survey also established that 68% of the parties had office bearers for all positions at the national level, while only 36% had office bearers for all positions at the provincial level.

**Distribution of Administrative Structure:** Out of the 28 political parties sampled, 79% had secretariat offices located in Lusaka province, while only 14% had administrative offices in all

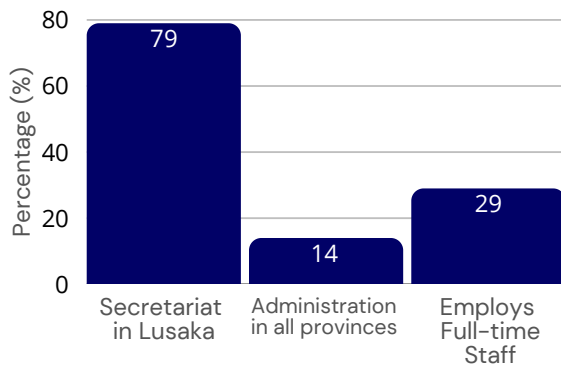
[26] Transparency International (2021). Report On The 2021 General Elections. <https://tizambia.org.zm/wp-content/uploads/2024/06/General-Elections-Report-October-2021.pdf>

[27] European Union Election Observation Mission (2021). Zambia 2021 Final Report. [https://www.eeas.europa.eu/eom-zambia-2021/eu-eom-zambia-2021-final-report\\_en](https://www.eeas.europa.eu/eom-zambia-2021/eu-eom-zambia-2021-final-report_en)

[28] Electoral Commission of Zambia (2021). 2021 Presidential Election Results by Constituency. [https://www.elections.org.zm/?page\\_id=4682](https://www.elections.org.zm/?page_id=4682)

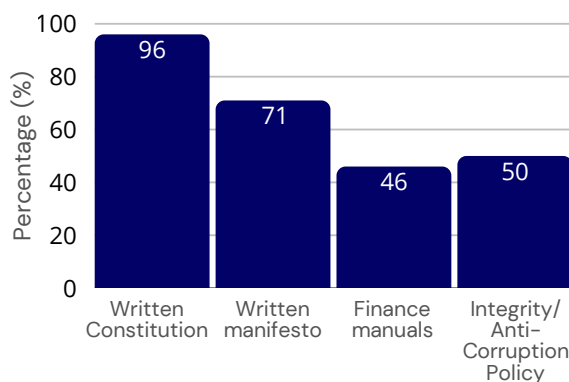
provinces. Further, only 29% of the sampled political parties had full-time staff employed by the political party at the secretariat or administrative offices. **Figure 3** presents the distribution of the administrative structure.

**Figure 3: Distribution of Administrative Structure across the Country**



**Policy and Oversight Environment:** Almost all the political parties sampled (96%) had Party Constitutions, while 71% reported that they also had Party Manifestos developed before the 2021 general elections. However, only three political parties published their manifestos before the 2021 general elections.<sup>25</sup> Further, the analysis revealed that 46% of the political parties had finance management manuals or policies, while 50% reported that they had Integrity or Anti-Corruption Policies. **Figure 4** presents the state of the policy and oversight environment among the sampled political parties.

**Figure 4: Policy and Oversight Environment in Selected Political Parties**

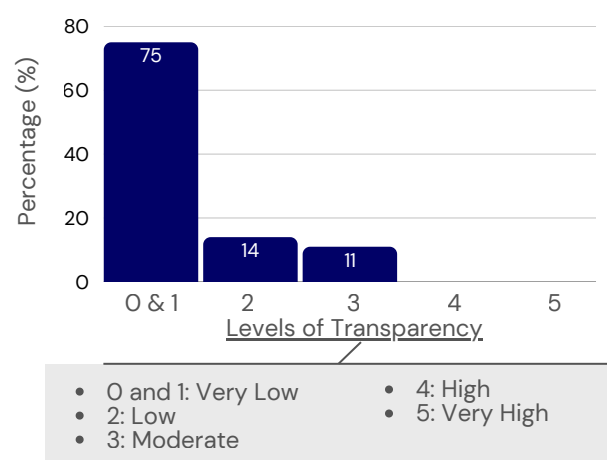


## 4.2 LEVEL OF POLITICAL FINANCE TRANSPARENCY

Out of the 28 political parties sampled, only 25% reported that they maintained detailed financial records and managed all incomes and expenditures through a commercial bank account, while 68% reported submitting annual returns, which do not include income and expenditure accounts, to the Registrar of Societies. The Registrar of Societies is the public entity responsible for overseeing and registering political parties in Zambia, as mandated by the Societies Act, Chapter 119 of the Laws of Zambia.<sup>29</sup> Among the 28 political parties sampled, no political party reported that they publish financial records for public scrutiny by voters.

The majority of the political parties (75%) had a transparency score of 0 or 1, which was categorised as very low transparency, followed by 14% that had a score of 2 and were categorised as low transparency. Only 11% of the political parties had a score of 3, and were classified as moderate transparency, while no political party scored 4 (high transparency) or 5 (very high transparency). **Figure 5** presents the distribution of transparency scores among the sampled political parties.

**Figure 5: Level of Political Finance Transparency in Selected Political Parties**



[29] Ministry of Home Affairs and Internal Security (2022). Regulatory To The Functions. [https://www.mohais.gov.zm/?page\\_id=1562](https://www.mohais.gov.zm/?page_id=1562)



Further analysis revealed that out of the political parties that participated in the 2021 general elections, 75% had very low transparency. Specifically, 33% of these parties participated in local government elections, 38% in parliamentary elections, and 38% in presidential elections. We also established that the average years of existence of political parties with moderate transparency was less than 9 years, as compared to 10 years for political parties with low transparency and 12 years for political parties with very low transparency, suggesting that older political parties have lower levels of transparency.

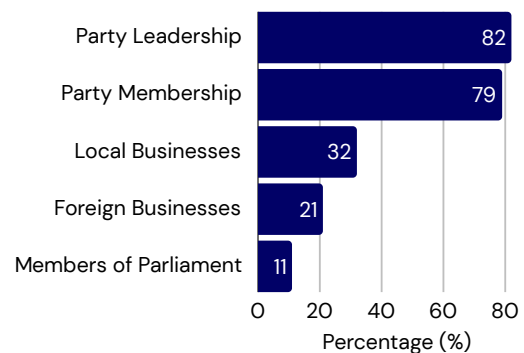
Furthermore, 75% of the political parties that held conventions to select party officeholders before the 2021 general elections, and 77% of the political parties with leadership in Lusaka and all provinces, exhibited very low transparency, suggesting that well-established political parties in Zambia have low levels of transparency. According to the Brennan Center for Justice,<sup>30</sup> transparency is more likely when there are strong legal frameworks for party financing and disclosure, political parties receive public funding, which often comes with transparency requirements, and civil society and media are active in monitoring political behaviour. These elements are largely absent in the Zambian context, which may explain the observed low levels of transparency among political parties.

### 4.3 SOURCES OF POLITICAL PARTY FINANCING IN ZAMBIA

The top sources of political financing for the sampled political parties were party leadership

(82%) and party membership (79%); however, 32% of the political parties also received donations from local businesses, and an additional 21% received donations from foreign companies. Financing from members of parliament (MPs) was the least common source of financing, accounting for only 11% of the political parties, as it is contingent upon having MPs elected to parliament. These findings are consistent with previous studies conducted in Zambia.<sup>31</sup> **Figure 6** presents the distribution of sources of political financing for the sampled political parties.

**Figure 6: Distribution of Sources of Political Financing in Zambia**



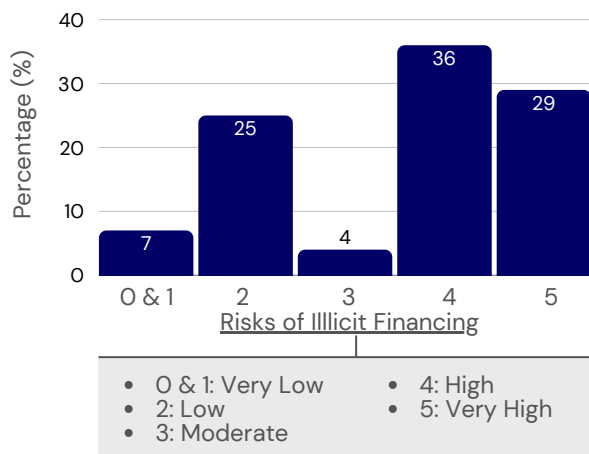
### 4.4 RISK OF ILLICIT FINANCING OF POLITICAL PARTIES IN ZAMBIA

The majority of the sampled political parties (64%) had risk scores of 4 (high risk) and 5 (very high risk), while 4% had risk scores of 3 (moderate risk). However, 25% had scores of 2 (low risk), and another 7% had risk scores of 0 or 1, which were combined and categorised as very low risk. **Figure 7** presents the distribution of the risk of illicit financing among the sampled 28 political parties in Zambia.

[30] Brennan Center for Justice (2015). Stronger Parties, Stronger Democracy: Rethinking Reform. <https://www.brennancenter.org/our-work/research-reports/stronger-parties-stronger-democracy-rethinking-reform>

[31] Adam Daka (2016). Political party financing in Zambia: exploring sources, transparency and accountability. <https://dspace.unza.zm/items/8aede254-09ba-4856-9aad-47d97a83905d>

**Figure 7: Risk of Illicit Financing among Selected Political Parties**



The above risk profile is due to the underlying findings that 50% of the sampled political parties did not conduct due diligence on the source of financing before accepting donations. In comparison, 64% accepted anonymous contributions, and another 82% did not request beneficial ownership information before accepting donations from businesses or companies. Furthermore, 79% of the sampled political parties accepted donations from other political parties that participated in public procurement or conducted business with the government. In comparison, another 75% accepted donations from foreign interests, including foreign governments, entities, and companies.

Further analysis revealed that out of the political parties that participated in the 2021 general elections, 69% had a high risk or very high risk of illicit financing. Specifically, 44% of these parties participated in local government elections, 39% in parliamentary elections, and 33% in presidential elections.

## 5 - CONCLUSION AND RECOMMENDATIONS

This study found that there is limited transparency and accountability among political parties in Zambia, as 75% of the assessed parties had very low transparency in managing their political financing. Only 25% reported keeping detailed financial records and managing political finances through commercial bank accounts, and nearly 67% reported submitting non-financial annual returns to the Registrar of Societies. The lack of political finance regulation and limited scrutiny of political parties by civil society and the media exacerbates the situation, as no political party has reported publishing financial information for public scrutiny by voters.

The study has also established that there is a high risk of illicit financing of political parties in Zambia, as over 64% of the political parties have either a high risk or a very high risk of illicit financing. Furthermore, 50% of the sampled political parties failed to conduct due diligence on the source of funding before accepting donations, and 64% accepted anonymous contributions. Out of the political parties assessed, 75% reported that they received donations from foreign interests, including foreign governments, foreign entities and foreign companies. This is linked to the finding that the top sources of financing for political parties in Zambia included donations from both local and foreign businesses.

It is also evident that the majority of political parties have not implemented adequate systems and policies to mitigate the risk of illicit financing.

Finally, over 53% of the political parties did not have finance management manuals or policies, despite 50% reporting that they had anti-corruption or integrity policies. The lack of due diligence on the sources of donations and the acceptance of donations from companies

participating in the public procurement process demonstrates the lack of capacity and access to mechanisms such as beneficial ownership registers. In recognising these findings, Transparency International Zambia makes the following recommendations:

**Table 2: Recommendations**

STAKEHOLDER	RECOMMENDATIONS	TIMEFRAME
<b>Government</b>	<ul style="list-style-type: none"> <li>• Enact a law to regulate political party financing and spending to enhance transparency and the accountability of political parties</li> <li>• Strengthen the oversight role of the Registrar of Societies by requiring political parties to submit income and expenditure statements as part of their annual returns.</li> </ul>	<ul style="list-style-type: none"> <li>• Medium Term</li> <li>• Short Term</li> </ul>
<b>Political parties</b>	<ul style="list-style-type: none"> <li>• Strengthen financial management by developing financial management manuals and conducting financial transactions through designated commercial bank accounts</li> <li>• Conduct due diligence checks before accepting donations and avoid donations from companies participating in public procurement</li> <li>• Publish income and expenditure accounts for public scrutiny, to enhance transparency and accountability</li> </ul>	<ul style="list-style-type: none"> <li>• Short Term</li> <li>• Short Term</li> <li>• Medium Term</li> </ul>
<b>Civil Society and Media</b>	<ul style="list-style-type: none"> <li>• Increase the scrutiny of political party funding by conducting assessments and studies on the management and sources of financing</li> <li>• Increase awareness of the importance of transparency in political party financing among voters</li> </ul>	<ul style="list-style-type: none"> <li>• Short-term</li> <li>• Medium Term</li> </ul>

## **Appendix A: List of Target Political Parties that participated in the 2021 Elections**

1. People's Alliance for Change (PAC)
2. United Prosperous and Peaceful Zambia (UPPZ)
3. Zambia United for Sustainable Development (ZUSD)
4. Party for National Unity and Progress (PNUP)
5. United Party for National Development (UPND)
6. Democratic Party (DP)
7. National Heritage Party (NHP)
8. Patriotic Front (PF)
9. Socialist Party (SP)
10. Movement for Multi-Party Democracy (MMD)
11. United National Independent Party (UNIP)
12. Economic Freedom Fighters (EFF)
13. National Restoration Party (NAREP)
14. Leadership Movement (LM)
15. Patriots for Economic Progress (PEP)
16. 3<sup>RD</sup> Liberation Movement (LM)





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