



TRANSPARENCY  
INTERNATIONAL  
ZAMBIA



**2025 | ANALYSIS OF THE UPND  
ADMINISTRATION'S FOUR-YEAR  
PERFORMANCE ON ANTI-CORRUPTION  
AND GOOD GOVERNANCE**

# **Assessment Report: Analysis Of the United Party for National Development (UPND) Administration's Four-Year Performance on Anti-Corruption and Good Governance**

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## **Acknowledgements**

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## 1. INTRODUCTION

In 2021, the Zambian people elected the United Party for National Development (UPND) administration on a promise of change following a period of sustained economic and governance decline under the Patriotic Front (PF) administration, during which corruption became entrenched and institutionalised, thereby eroding public trust in governance institutions,<sup>1</sup> among other effects. As part of their 2021–2026 Manifesto<sup>2</sup>, the UPND promised to address the obtaining ills through restoring law and order, macroeconomic stability and enhancing the fight against corruption.

This analysis seeks to evaluate the UPND's performance and progress during the first 4 years of office, following the August 2021 elections. The analysis focuses on governance and anti-corruption commitments as outlined in the UPND manifesto. Under section 1, sub section 1.1 we present the objectives of the analysis while sub section 1.2 presents the methodology. Further, we present the main analysis on Anti-corruption performance in section 2, and the General governance performance in section 3, before concluding with some key recommendations in section 4.

## 2. OBJECTIVES

The objectives of this analysis are:

- To assess the UPND administration's progress in achieving their anti-corruption and good governance promises.

- To provide practical recommendations on strengthening the anti-corruption agenda and overall governance in Zambia during the remaining one year of the current UPND mandate.

## 3. METHODOLOGY

In analysing the UPND administration's progress and performance, TI-Z generated 12 key promises from the objectives on corruption, rule of law and economic management outlined in the ruling party's manifesto 2021–2026.<sup>2</sup> These provided the basis for a comprehensive assessment of the progress across seven (7) anti-corruption thematic areas and three (3) sub-themes on the general governance environment.

Further, and in building on the previous analysis of the UPND's 2 years performance, this analysis utilised a five-point scale; with 1 representing very low performance, 2 low performance, 3 moderate performance, 4 high performance and 5 representing very high performance. The results reflect the perceptions of 65 relevant stakeholders promoting good governance in Zambia, including national-level and community CSOs, International and local Non-Governmental Organisations, cooperating partners, academic institutions, think tanks and media houses, among others. TI-Z also conducted thematic analysis on the justifications for the rankings provided by the stakeholders as well as desk-based research to collaborate the findings.

[1] <https://www.imf.org/-/media/Files/Publications/CR/2023/English/1ZMBEA2023001.ashx>

[2]<https://static1.squarespace.com/static/607ecab103ab20228defa27d/t/6093f07e5281d054decacc79/1620308100501/UPND+MANIFESTO.pdf>

## 4. FINDINGS

### 4.1 Political Will and Strengthening the Anti-Corruption Commission

#### Promise 1 (Political Will)

The UPND promised to **fully commit to fighting corruption**, based on a strong principle of zero tolerance to corruption in all its forms.

2.4/5

Rating: 2.4/5 (low performance)

#### Challenges:

- The UPND has excessively focused on the failures of the Patriot Front (PF) administration instead of focusing on fulfilling their own numerous promises<sup>3</sup>
- There is a big gap between political rhetoric and action, while at the same time; the UPND is slow at taking corrective action. Recent examples include the ZAMMSA Scandal<sup>4</sup> and the Sino Mine Pollution<sup>5</sup>
- There is some evidence of politicisation of the fight against corruption as there is limited political will to combat corruption involving UPND officials and supporters,<sup>6</sup> who remain obscure and un-named, while opposition and PF officials are quick to face prosecution and are named<sup>7</sup>

#### Promise 2 (Anti-Corruption Commission)

The UPND promised to strengthen the Anti-Corruption Commission.

2.3/5

Rating: 2.3/5 (low performance)

#### Prospects:

- The UPND appointed a new Board and Director General at the Anti-Corruption,<sup>8</sup> therefore addressing the leadership vacuum at the institution, created by the resignation of the Director General and dissolution of the Board in July 2024.<sup>9</sup> However, the administration has not addressed the underlying corporate governance issues between the Board and the Director General.
- Over the past 4 years, the UPND Administration has significantly increased the budget allocated to the Anti-Corruption Commission. The budget Allocation increased from K72.8 million<sup>10</sup> in 2021 to almost K180 million in 2025.<sup>11</sup>

#### Challenges:

- There has been limited strengthening of the Anti-Corruption Commission due to stalled legal reforms, such as the amendment of the Anti-Corruption Act,

[3] <https://diggers.news/local/2023/01/13/when-you-have-no-ideas-you-focus-on-the-blame-game-kampyongo/>

[4] <https://zm.usembassy.gov/united-states-to-cut-50-million-in-medications-and-medical-supplies-support/>

[5] <https://diggers.news/opinion/2025/08/25/hh-sounds-apologetic-than-authoritative-on-mine-spillage-pollution-part-1/>

[6] <https://diggers.news/local/2024/07/26/were-investigating-some-ministers-govt-officials-for-corruption-acc/>

[7] <https://diggers.news/courts/2024/11/14/lusambo-appeals-4-year-sentence/>

[8] <https://diggers.news/local/2025/01/18/hh-appoints-hamaundu-as-acc-chair-nalucha-engwase-as-commissioners/>

[9] <https://diggers.news/local/2024/07/18/hh-dissolves-acc-board-2/>

[10] [https://www.mofnp.gov.zm/?page\\_id=4096#](https://www.mofnp.gov.zm/?page_id=4096#)

[11] [https://www.mofnp.gov.zm/?page\\_id=4096#](https://www.mofnp.gov.zm/?page_id=4096#)

even though these reforms are part of the IMF Supported Program. The IMF recently underscored the importance of strengthening governance, promptly adopting the new Anti-Corruption Act and strengthening the independence of the Anti-Corruption Commission.<sup>12</sup>

#### Promise 3 (Cost and Benefits of Corruption)

The UPND promised to increase the benefits of being honest and the costs of being corrupt.

2.2/5

Rating: 2.2/5 (low performance)

#### Challenges:

- Apart from the prosecution of former ministers and officials, there has been limited policy direction and specific action to increase the benefits of being honest and the cost of being corrupt within their administration. Such action should include the enactment of effective asset declaration and lifestyle audit laws.<sup>13</sup>

## 4.2 Performance on other Measures taken to Combat Corruption

#### Promise 4 (Fast-Track Courts)

The UPND promised to establish special fast track anti-corruption courts to clear the backlog of outstanding

2.4/5

corruption cases and expedite the conclusion of similar cases going forward.

Rating: 2.4/5 (low performance)

#### Prospects:

- In conjunction with the National Prosecution Authority, the Judiciary has developed rules for the Economic and Financial Crimes (EFC) Court. Among these rules is the hearing and determining of matters before the Court within five months from the date of plea or filing of appeal.<sup>14</sup> Consequently, the EFC Court has finalized several high profile cases.<sup>15</sup>

#### Promise 5 (Open-Door Policy)

The UPND promised to ensure that all public offices will have open door policies at all levels from the minister to the lowest technocrat.

2.3/5

Rating: 2.3/5 (low performance)

#### Prospects:

- The President has facilitated for periodic meetings with a consortium of Civil Society Organisation as part of the Open-door policy<sup>16</sup>
- Some public officials have been open to dialogue and meetings. However, the majority of these meetings and engagements have not lead to meaningful action.<sup>17</sup>

[12] <https://www.imf.org/en/News/Articles/2025/08/05/pr25276-imf-executive-board-concludes-2025-article-iv-con-and-completes-5th-review-ecf-zambia>

[13] <https://zm.usembassy.gov/transparency-international-zambia-2023-anti-corruption-conference/>

[14] <https://zambialii.org/akn/zm/act/si/2024/10/eng@2024-01-26/source.pdf>

[15] <https://www.npa.gov.zm/index.php/2024/09/28/court-orders-forfeiture-of-former-first-ladys-15-luxury-properties/>

[16] <https://diggers.news/local/2024/12/10/proposed-cybercrimes-bills-a-threat-to-democracy-csos-tell-hh/>

[17] <https://tizambia.org.zm/2025/05/a-rapid-assessment-on-the-status-of-implementation-of-zambias-imf-governance-diagnostic-recommendations/>

**Challenges:**

- There is no policy guidance on the open-door policy with respect to public officials such as ministers and other technocrats. Further, some stakeholders have also faced challenges in gaining access to the President.<sup>18</sup>

government officials declare any new wealth annually.

**Rating: 1.6/5 (low performance)**

**Challenges:**

- There has been a lack of demonstrated commitment due to failure to declare assets and liabilities by the President.<sup>21</sup> Zambia still does not have a comprehensive declaration of assets law for all public officials.<sup>22</sup>

**Promise 6 (Access to Information)**

The UPND promised to ensure that all unclassified public records are readily available and open to the public for scrutiny.

2.2/5

**Rating: 2.2/5 (low performance)**

**Prospects:**

- Zambia enacted the Access to Information Act No. 24 of 2023 on 13th December 2023, and the Act was assented to by the Republican president on 22nd December 2023<sup>19</sup>

**Challenges:**

- Despite the issuance of the Access to Information (Commencement) Order<sup>19</sup> on 25th June 2024, there is still no effect access to information. This is because a lack of full operationalisation of the Act and thus public records are not available or open to public scrutiny.<sup>20</sup>

**Promise 7 (Declaration of Assets/Wealth)**

The UPND promised to ensure

1.6/5

**Promise 8 (Lifestyle Audits)**

The UPND promised to conduct lifestyle audits, with any civil servant found wanting to be suspended until a court ruling.

1.8/5

**Rating: 1.8/5 (low performance)**

**Challenges:**

- The UPND Administration has not develop a law or policy on lifestyle audits and thus Government has not implemented this promise. Further, the position on suspending civil servants until court rulings has been selectively implemented<sup>23</sup>

**Promise 9 (Unexplained Wealth Orders)**

The UPND promised to introduce unexplained wealth orders to allow law enforce-

2.1/5

[18] <https://diggers.news/local/2024/12/10/proposed-cybercrimes-bills-a-threat-to-democracy-csos-tell-hh/>  
 [19] <https://tizambia.org.zm/2025/05/a-rapid-assessment-on-the-status-of-implementation-of-zambias-imf-governance-diagnostic-recommendations/>

[20] <https://tizambia.org.zm/2025/05/a-rapid-assessment-on-the-status-of-implementation-of-zambias-imf-governance-diagnostic-recommendations/>

[21] <https://diggers.news/local/2025/03/06/no-law-obliges-a-sitting-president-to-declare-assets-post-elections-ag/>

[22] <https://zm.usembassy.gov/transparency-international-zambia-2023-anti-corruption-conference/>

[23] <https://diggers.news/local/2025/08/01/weve-closed-one-case-against-solicitor-general-due-to-insufficient-evidence-acc/>

ment to seize any property purchased using means that cannot be proven within the courts of law.

**Rating: 2.1/5 (low performance)**

**Prospects:**

- The UPND Administration has introduced unexplained wealth orders and several properties have been forfeited to the state.

**Challenges:**

- The use of unexplained wealth orders has largely been on officials and associates from the previous administration and thus raising concern on possible selective application of the law.<sup>24</sup>

**Promise 10 (Operation Recovery)**

The UPND promised to launch "Operation Recovery," to ensure public money corruptly obtained is returned to the public.

**2.8/5**

**Rating: 2.8/5 (moderate performance)**

**Prospects:**

- The Administration successfully launched "Operation Recovery" and Several cases have resulted in recovery of stolen money and properties<sup>25</sup>

## 4.3 Performance on general Good Governance Measures

### Promise 11 (Rule of Law)

The UPND promised to uphold the rule of law, security and justice.

**2.6/5**

**Rating: 2.6/5 (moderate performance)**

**Prospects:**

- There has been an improvement in public order and rule of law, especially with regards controlling the dominance of political party carders.<sup>26</sup> However, recent enactment of cyber laws are constraining the freedom of expression.<sup>27</sup>

**Reasons/Justifications:**

- The Executive arm of government has continued to dominate the other arms of government, thereby compromising effective checks and balances. Civil society believe that the exercise of executive powers by the President compromises the independence of the Judiciary, as the President is able to remove judges that deliver judgements that are seemingly unfavourable to the executive.<sup>28</sup>
- Electoral malpractices during by-elections are concerning, especially when the ruling party is seemingly participating in the vice.<sup>29</sup>

[24] <https://www.npa.gov.zm/index.php/2024/09/28/court-orders-forfeiture-of-former-first-ladys-15-luxury-properties/>

[25] <https://diggers.news/local/2024/11/14/npa-recovers-over-k1-5bn-as-dpp-insists-were-not-targeting-anyone/>

[26] <https://diggers.news/local/2021/08/26/saccord-hails-upnd-govts-commitment-to-ending-caderism/>

[27] <https://techafricanews.com/2025/04/23/laz-opposes-zambias-new-cyber-laws-over-rights-infringement/>

[28] <https://diggers.news/local/2024/10/21/hh-fires-3-concourt-judges/>

[29] <https://dailyrevelationzambia.com/ti-z-concerned-with-k50-distributions-other-gifts-by-upnd-officials-in-kawambwa/>

### Promise 12 (Economic Management)

The UPND promised to enhance economic management and the management of public resources.

2.7/5

**Rating: 2.7/5 (moderate performance)**

#### Prospects:

- There has been improvements in economic management, as evidenced by successful debt restructuring, improved macroeconomic stability, including lower inflation and stability of the exchanges, and investments in various sectors of the economy<sup>30</sup>

#### Reasons/Justifications:

- Despite the increased transparency of the Ministry of Finance and National Planning, in sharing key reports, there is evidence of abuse of resources under programme such as the Constituency Development Fund (CDF)<sup>31</sup>
- Many Zambians remain poor, despite improved economic performance due to slow implementation of development programmes. At national level, the incidence of poverty increased 60.0% in 2022 compared to 54.4% in 2015.<sup>32</sup>
- Although there have been consistent policy pronouncements, the UPND Administration continues to grapple with an increase in illegal mining of minerals across the country, resulting in associated risks such as pollution and loss of life.<sup>33</sup>

## 5. CONCLUSION AND RECOMMENDATIONS

Transparency International Zambia (TI-Z) has evaluated the UPND's performance on anti-corruption and good governance to determine the administration's progress in achieving its promises. The highest score was 2.8/5 (moderate performance) on recovering plundered public money, followed by 2.7/5 (moderate performance) on economic management, as evidenced by the successful debt restructuring, improved macroeconomic stability and investments in various sectors. This third highest score was 2.6/5 on restoring the rule of law, security and justice. Stakeholders submitted that the UPND has controlled the dominance of political party cadres, even though the enactment of cyber laws continues to constraint freedom of expression. It is also notable that the CSOs and NGOs gave the UPND administration low performance scores on 10 out of the 12 promises assessed. Consequently, the overall performance of the UPND administration after 4 years in government was 2.1/5. This means that the administration achieved an overall score of low performance on its anti-corruption and governance promises.

In arriving at this score, stakeholders cited prospects such as the introduction of wealth orders and forfeiture of properties, the enactment of the Access to information Act No. 24 of 2023, the holding of meetings

[30] <https://www.imf.org/en/News/Articles/2025/08/05/pr25276-imf-executive-board-concludes-2025-article-iv-con-and-completes-5th-review-ecf-zambia>

[31] <https://tizambia.org.zm/2025/03/analysis-of-the-2023-constituency-development-fund-cdf-audit-report/>

[32] <https://www.undp.org/sites/g/files/zskgke326/files/2023-10/highlights-of-the-2022-poverty-assessment-in-zambia-2023.pdf>

[33] <https://www.zra.org.zm/illegal-mining-requires-a-multi-faceted-approach-hon-lufuma/>

with a consortium of CSOs, and the speedy handling of court cases following the establishment of fast-track courts, among others. The major challenges include the excessive focus on the failures of the previous Patriotic Front Administration, the notable gap between political rhetoric and action as well as the slow pace in taking corrective action. Other observations included the politicization of the fight against corruption and stalled legal reforms such as the amendment of the Anti-Corruption Act.

In considering the above, Transparency International Zambia recommends:

- Deep reflection and introspection on the part of the administration with respect to the findings of this report. It is important to note that external stakeholders provide an independent perspective which merits the Administration's consideration.
- Restoration of political will in the fight

against corruption beyond the President. Other senior public officials such as Ministers and Permanent Secretaries should also demonstrate political will in order to present a united front.

- Acceleration of governance reforms such as the amendment of the Anti-Corruption Act, full operationalization of the Access to Information Act, and enactment of declaration of assets and lifestyle audit laws
- Enhancement of economic reforms to integrate new measures aimed at addressing the cost of living, poverty and income inequality
- Stronger resolve to strengthen the civic space and to embrace integrity as the country approaches the 2026 general election
- Fair application of unexplained wealth orders across political parties and among politically influential persons in both former and current administrations.



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