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2025 CORRUPTION RISKS ASSESSMENT

ON THE

IMPLEMENTATION OF THE SOCIAL CASH TRANSFER PROGRAMME IN ZAMBIA

STUDY REPORT | 2026

Study Report: 2025 Corruption Risks Assessment on the Implementation of the Social Cash Transfer Programme in Zambia

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Transparency International Zambia

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Key Insights

- The Social Cash Transfer (SCT) programme is Zambia's largest and most important public social protection intervention.
- Several stakeholders have conducted evaluations and performance audits on Zambia's SCT programme, demonstrating that the programme has positive impacts on poverty and other vulnerabilities.
- Although there is no information on the corruption risks and vulnerabilities in the implementation of the SCT programme, recent audit reports provide evidence of mismanagement in selected districts. These include the fraudulent inclusion of ghost beneficiaries to facilitate payments; the selective application of proxy means tests (PMTs) in evaluating beneficiaries; and the payment of funds to ineligible beneficiaries, among others.
- These corruption risks are concerning, given the increased budget allocation to the programme.
- Corruption is a systemic phenomenon and, at the same time, a failure of governance and development. Therefore, if policymakers are to tackle corruption rigorously, they need to rely on corruption risk assessments (CRAs).
- This corruption risk assessment (CRA) sought to identify corruption vulnerabilities and risks in the implementation of the Social Cash Transfer (SCT) programme in Zambia. Specifically, it sought to assess the corruption risks and vulnerabilities in the implementation of the Social Cash Transfer (SCT) programme in selected districts across the country and document perceptions and experiences of corruption in the SCT programme in Kalumbila and Solwezi Districts
- The assessment found that the highest corruption risk was the payment of money to representatives of beneficiaries, also known as 'deputies,' following the death of beneficiaries. This was due to the enabling vulnerability of procedural delays in updating beneficiary status information and an accommodative policy seeking to replace the deceased beneficiary with either the deputy or another family member.
- Furthermore, the case study of Kalumbila and Solwezi districts indicates that there were risks of bribery, nepotism, conflict of interest and political interference in the Social Cash Transfer Programme.
- Although the introduction of mobile money payments reduced the risk of handling cash and facilitated the quick processing of payments, it has also elevated corruption risks and implementation challenges, especially for the elderly, blind and technologically vulnerable or illiterate beneficiaries.
- Transparency International Zambia calls on the Government to ensure that mobile money payments are contextualised to district-level situations in terms of network coverage and cash access points; and to individual situations in terms of technological capacity and literacy of the beneficiaries.
- There is also a need to improve the payment process to ensure simultaneous payments across network operators. This will both reduce the number of complaints related to delays and also improve complaint handling.
- The Ministry of Community Development and Social Services should also consistently provide allowances and identification documentation for CWAC and ACC members. This is in light of the heightened corruption risks associated with their voluntary status and the limited financial support to cover transportation and other logistics.

- The Anti-Corruption Commission, Civil Society Organisations and the Office of the Auditor General should upscale their anti-corruption efforts, including corruption prevention efforts targeting the SCT Programme and other similar welfare and empowerment programmes.

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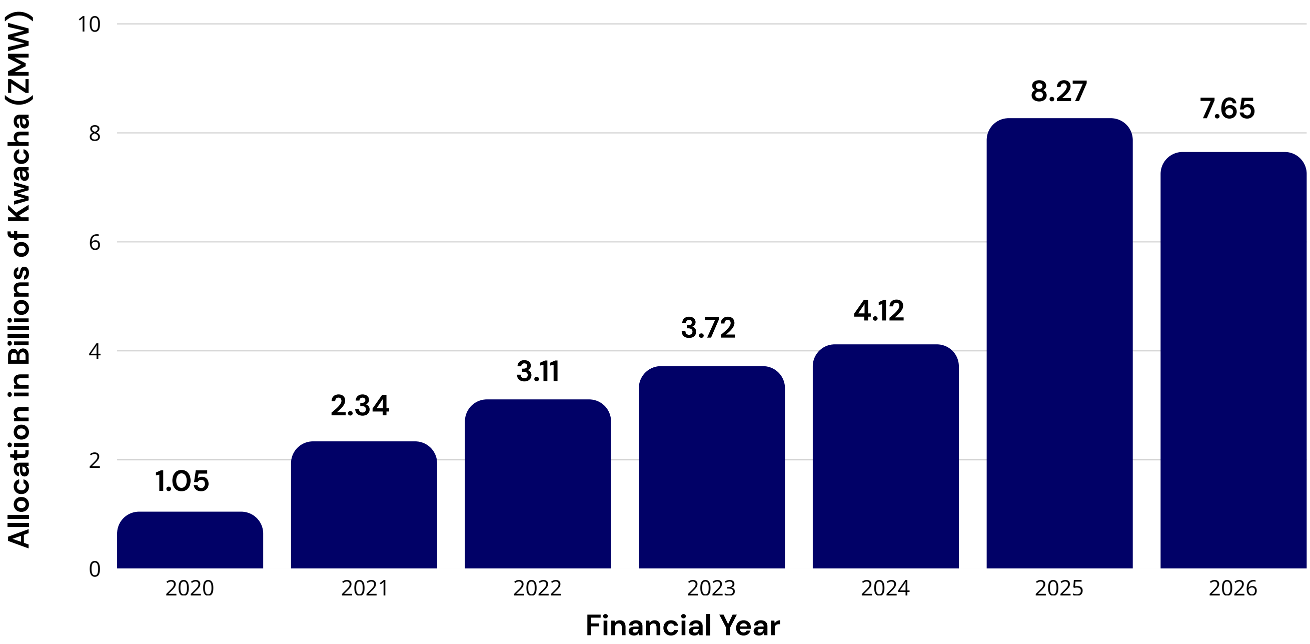
1.1 OVERVIEW OF ZAMBIA'S SOCIAL CASH TRANSFER PROGRAMME

The Social Cash Transfer (SCT) programme is Zambia's largest and most important public social protection intervention. The Programme targets households with persons aged 60 or above, persons with a severe disability, persons who are chronically ill and on palliative care, female-headed households and child-headed households.[1] In terms of beneficiaries, the Zambian government increased the number of beneficiary households under the Programme to 1.3 million in 2025 from 895,000 in[1] 2021.[2] Furthermore, the Government plans to increase the number of beneficiaries to 1.5 million households in 2026, paying K800 (approximately USD$ 40) bi-monthly to households with a person with disability, and K400 (approximately USD $20) bi-monthly to all the other beneficiary households.[2] [1] This cash transfer amount may not be sufficient to fully compensate for financial shocks, particularly affecting food consumption and income.[3] In 2025, the Zambian government allocated over K8.27 billion to the SCT programme, compared with K4.12 billion in 2024. This significant increase in budget allocation was attributed to the introduction of the Emergency Social Cash Transfer, which targeted additional households affected bythe 2023/2024 drought nationwide,[4] with financial support from the World Bank and other bilateral partners.[5] **Figure 1** presents a trend of budget allocations towards the Social Cash Transfer programme.

Figure 1: Budget Allocation to the Social Cash Transfer programme, 2020-2026



[1] UNICEF (2025). Qualitative Study of the Social Cash Transfer Programme in Urban Zambia. https://www.unicef.org/zambia/media/6686/file/SE_Zambia_QUIP_Report.pdf.pdf

[2] Government of the Republic of Zambia (2025). 2026 Budget Address By Honourable Dr. Situmbeko Musokotwane, MP, Minister Of Finance And National Planning, Delivered to The National Assembly On Friday, 26th September, 2025. https://www.parliament.gov.zm/node/12578

[3] UNICEF (2025). Qualitative Study of the Social Cash Transfer Programme in Urban Zambia. https://www.unicef.org/zambia/media/6686/file/SE_Zambia_QUIP_Report.pdf.pdf

[4] Government of the Republic of Zambia (2025). Estimates of Revenue and Expenditure (Output Based Budget) For the Year 1st January 2026 to 31st December 2026. https://www.mofnp.gov.zm/?page_id=4096#

[5] World Bank (2024). Project Information Document (PID). https://documents1.worldbank.org/curated/en/099060724130021981/pdf/P1817111271dfb0e1a8541046687bb3e68.pdf

Figure 1 indicates that the budget allocation to the SCT programme increased from K1.05 billion in 2020 to over K7.65 billion in 2026. Furthermore, the 2026 budget allocation to the SCT Programme exceeded the K6.23 billion allocated to the Constituency Development Fund (CDF) programme and the K6.4 billion allocated to Drugs and Medical Supplies.[2] In terms of impact, recent evaluations of the SCT programme in Zambia suggest that the programme has positive and protective effects on food security, income, child health and education, and household assets.[1] There is also evidence that the SCT programme has protective effects on the livelihoods of many recipients. During times of external shocks, such as high inflation and drought, the SCT prevents vulnerable households from sliding further into poverty.[1]

1.2 CORRUPTION RISKS IN ZAMBIA'S SCT PROGRAMME

Transparency International (TI) defines corruption as the abuse of entrusted power for private gain and argues that exposing corruption and holding the corrupt to account can only happen if policymakers understand how corruption works and the systems that enable it.[6] Corruption is a systemic phenomenon and, at the same time, a failure of governance and development. Therefore, if policymakers are to tackle corruption rigorously, they need to rely on corruption risk assessments (CRAs). CRAs such as the Mining Award Corruption Risks Assessment Tool (MACRA)[7] and the Infrastructure Corruption Risk Assessment Tool (ICRAT)[8] are diagnostic tools that identify corruption risks or vulnerabilities within a governance or development system.[9] They identify specific areas that may present opportunities for corruption, focusing on potential rather than the perception, existence, or extent of corruption.[5]

Several stakeholders have conducted evaluations[1] and performance audits[10] on Zambia's SCT programme, demonstrating that the programme has positive impacts on poverty and other vulnerabilities. Although there is no information on the corruption risks and vulnerabilities in the implementation of the SCT programme, recent audit reports provide evidence of mismanagement in selected districts. These include the fraudulent inclusion of ghost beneficiaries to facilitate payments; the selective application of proxy means tests (PMTs) in evaluating beneficiaries; and the payment of funds to ineligible beneficiaries, among others.[11] These corruption risks are

[6] Transparency International (2026). What is corruption? https://www.transparency.org/en/what-is-corruption
[7] Transparency International Australia (2024). THE MACRA TOOL. https://transparency.org.au/publications/macra-tool/
[8] Transparency International Australia (2024). The Infrastructure Corruption Risk Assessment (ICRAT) Tool. https://transparency.org.au/icrat/
[9] McDevitt, A. (2011). Corruption Risk Assessment Topic Guide. Transparency International. https://knowledgehub.transparencycdn.org/kproducts/Corruption_Risk_Assessment_Topic_Guide.pdf
[10] Office of the Auditor General (2023). Follow-up Performance Audit Report of the Auditor General on the Implementation of the Social Cash Transfer Programme in Zambia 2018-2023. https://www.ago.gov.zm/wp-content/uploads/Performance-Audit-Report-on-Social-Cash-Transfer-2018-2023.pdf
[11]Office of the Auditor General (2025). Report of the Auditor General on the Accounts of the Republic of Zambia for the financial year ended 31st December 2024. https://www.ago.gov.zm/wp-content/uploads/Auditor-General-Report-for-the-Financial-Year-2024-ONLINE-PUBLICATION.pdf

concerning, given the increased budget allocation to the programme.

Furthermore, assessments of similar government programmes, such as the Farmer Input Support Programme (FISP), have revealed several corruption risks. According to the International Monetary Fund (IMF), the ineffective implementation of FISP has historically been due to corruption, poor targeting, and leakage to non-beneficiaries, among other factors.[12] In unconditional cash transfer programmes (UCTs), such as the SCT programme, the presence of corruption leads to lower satisfaction among beneficiaries.[13] In addition, corruption and fraud in social welfare programmes can lead to inefficient use of public resources, reduced availability of funds for the poor, loss of programme credibility, political manipulation of funds, and decreased public support for the programme.[14]

1.3 PURPOSE AND OBJECTIVE

The corruption risk assessment (CRA) sought to identify corruption risks and vulnerabilities in the implementation of the Social Cash Transfer (SCT) programme in Zambia. The following specific objectives guided the assessment:

1. Assess corruption risks and vulnerabilities in the implementation of the Social Cash Transfer (SCT) programme in selected districts across the country.
2. Document perceptions and experiences of corruption in the SCT programme in Kalumbila and Solwezi Districts
3. Recommend measures to strengthen integrity and mitigate corruption risks in the implementation of the SCT programme in Zambia

2. METHODOLOGY

2.1 CONCEPTUAL FRAMEWORK

Robert Klitgaard's Principal-Agent model provides an important framework for understanding corruption from a public policy perspective. Klitgaard argues that corruption increases with monopoly or exclusive powers and discretion, and reduces with transparency.[15] This means that public officials implementing the SCT Programme are more likely to engage in corrupt activities if they possess exclusive powers and considerable discretion in making such decisions, while being subject

[12] International Monetary Fund (2023). Zambia: Technical Assistance Report-Diagnostic Report on Governance and Corruption. https://www.elibrary.imf.org/view/journals/002/2023/003/article-A001-en.xml
[13] Gaduh, A., Hanna, R., and Olken, B.A. (2023) The Marginal Disutility from Corruption in Social Programs: Evidence from Program Administrators and Beneficiaries. Faculty Research Working Paper Series RWP23-008. Cambridge, MA: Harvard Kennedy School. Available at: https://appext.hks.harvard.edu/publications/getFile.aspx?Id=5199 (accessed 24 June 2026).
[14] van Stolk, C., and Tesliuc, E.D. (2010) Toolkit on Tackling Error, Fraud and Corruption in Social Protection Programs. SP Discussion Paper No. 1002. Washington, DC: World Bank (and ISSA). Available at: https://www.issa.int/sites/default/files/external-references/files/1002-1--55769.pdf (accessed 24 June 2026).
[15] Alfaro, J. A., & Mordt (5th May 2022). The Anti-corruption Formula. https://www.undp.org/latin-america/blog/anti-corruption-formula

to limited accountability mechanisms, such as transparency or disclosure requirements.

Klitgaard's model suggests that having sufficient controls over the exercise of power and discretion and putting in place accountability mechanisms are critical to mitigating corruption risks and ensuring effective implementation and sustainability.[16] Therefore, in the absence of such controls and mechanisms, cash transfers become vulnerable to fraud and corruption, including those associated with political manipulation, during payment processing and the manipulation of selection criteria.[17] This is characteristic of trends in Zambia, where some public officials plunder funds by manipulating payment processes or beneficiary lists.[18]

2.2 RESEARCH DESIGN

In conducting the Corruption Risk Assessment (CRA), Transparency International Zambia employed an exploratory sequential mixed-methods design, which included the collection of quantitative data through an experiential-based survey, followed by the collection of qualitative data through key informant interviews, and desk-based research. This design enabled deeper exploration and identification of corruption risks and good practices, as well as the development of a case study highlighting key perceptions and experiences in the programme.

2.3 CORRUPTION EXPERIENTIAL SURVEY

TI-Z conducted the experiential survey in September 2025, with 632 respondents, including 407 CWAC members, 96 ACC members, and 87 Pay Point managers. Furthermore, 20 DWAC members, and all 12 District Social Welfare Officers and 10 Provincial Social Welfare Offices in the target districts and provinces, respectively, participated in the survey. In selecting the sample, TI-Z employed quota sampling and did not target beneficiaries, due to difficulties in establishing a complete list of participants in the SCT programme. Data collectors were given quotas based on respondent categories in specific districts. The selected districts included Chongwe, Ndola, Chipata, Kasama, Mansa, Chinsali, Solwezi, Mongu, Kapiri Mposhi, Kabwe, Livingstone and Choma. Figure 2 presents the distribution of the respondents by stakeholder category, while Figure 3 presents the distribution of the sample by province and district.

[16] Mbugua, L. N. (2015). Challenges in Management of Older Persons Cash Transfer Programme in Kenya. Case Study Of Ministry of Labour, Social Security And Services. https://www.strategicjournals.com/index.php/journal/article/view/71
[17] Chêne, M. (2010). Corruption prevention strategies in cash transfer schemes. https://www.u4.no/publications/corruption-prevention-strategies-in-cash-transfer-schemes.pdf
[18] Office of the Auditor General (2025). Report of the Auditor General on the Accounts of the Republic of Zambia for the financial year ended 31st December 2024. https://www.ago.gov.zm/wp-content/uploads/Auditor-General-Report-for-the-Financial-Year-2024-ONLINE-PUBLICATION.pdf

Figure 2: Distribution of Sample Respondents by Stakeholder Category

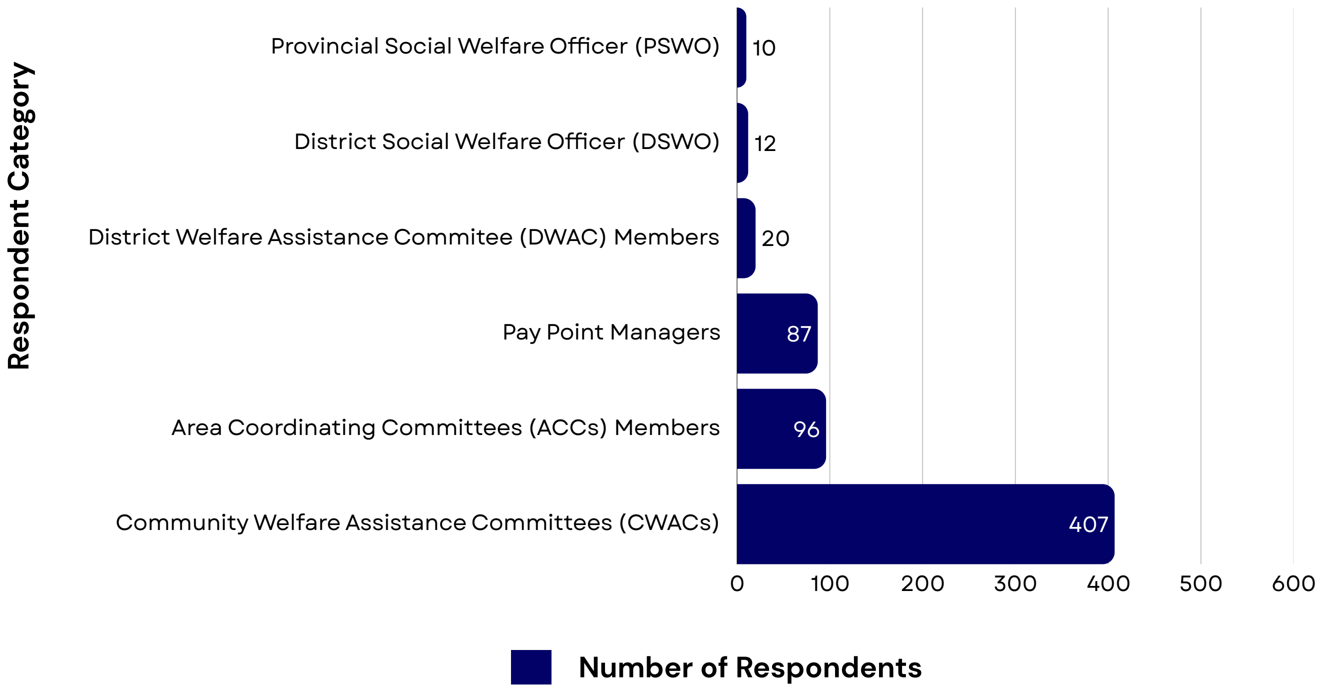


Figure 3: Distribution of Sampled Respondents by District (n=632)

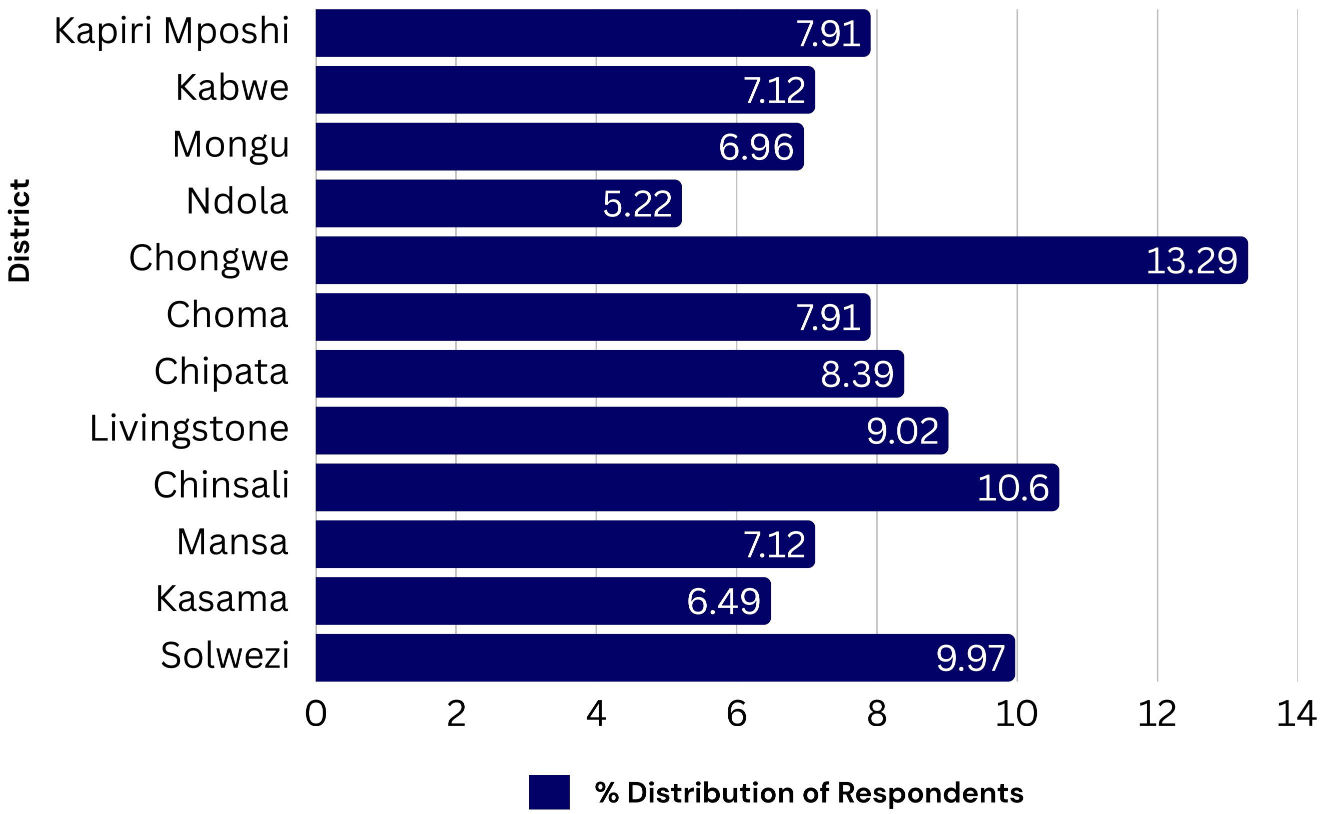


Figure 3 indicates that Chongwe district had the highest number of respondents (13.29%), followed by Chinsali (10.6%), Solwezi (9.97%) and Livingstone (9.02%); with the remaining districts each accounting for between 5% and 9% of the sample.

In analysing the survey data, TI-Z generated both the status of performance of critical roles in the SCT programme and the risk and vulnerability ratings, using weighted averages across respondents. In line with Transparency International's Guide on Corruption Risk Assessments,[19] corruption vulnerabilities (V) were defined as institutional weaknesses in the SCT programme within the control of policymakers and implementers, and corruption risks (R) as those outside their control or emanating from the identified vulnerabilities. TI-Z presented both categories of findings using tables and figures derived from statistical software.

2.4 KEY INFORMATION INTERVIEWS

TI-Z conducted key informant interviews in October 2025, with 19 stakeholders from Solwezi and Kalumbila Districts participating in the key informant interviews (KIIs). These included CWAC Members, ACC Members, and District Social Welfare Officers. Key insights from the interviews were derived through thematic analysis, with the themes informing the development of the case study on perceptions and experiences of corruption in these districts. TI-Z also synthesised information from key informants through desk-based research to eliminate errors or bias in the responses. Furthermore, the derived themes and case study narrative were peer reviewed to identify any analytical bias.

3. STATUS OF IMPLEMENTATION OF THE SCT PROGRAMME

3.1 PUBLIC PARTICIPATION IN THE SCT PROGRAMME

There was evidence of high public participation among critical stakeholders in executing their roles and responsibilities, due to strong community ownership and the volunteer system used to implement the programme. To enhance transparency and accountability in the SCT Programme Implementation, the lowest community structures, comprising CWAC and ACC members, are responsible for sharing information with beneficiaries, supporting the registration of new beneficiaries, confirming the beneficiary list before payments, and witnessing payments, among other tasks. Table 2 presents the status of role and responsibility performance for both CWAC and ACC members.

[19] Transparency International (2011).Corruption Risk Assessment Topic Guide. https://knowledgehub.transparencycdn.org/kproducts/Corruption_Risk_Assessment_Topic_Guide.pdf

Table 1: Status of Role and Responsibility Performance, CWAC and ACC members.

CWAC Members (n=383)		ACC Members (n=89)	
Role	**Participation Rate (%)**	**Role**	**Participation Rate (%)**
Sharing information with beneficiaries (Transparency)	99.2%	Share information with the public	98.8%
Supporting the registration of new beneficiaries	99.0%	Support the registration and enumeration process	97.8%
Visiting beneficiaries in homes	94.0%	Coordinating the work of CWACs	97.8%
Validation of Beneficiaries list	91.6%	Reporting errors on the beneficiaries list	96.6%
Witnessing of Payments	90.3%		
Receiving complaints and grievances	95.3%	Receiving complaints and grievances	95.5%
Referring difficult complaints and grievances to ACCs	87.9%	Referring difficult complaints and grievances to DSWOs	95.5%

As indicated in Table 1, the survey found that the vast majority of CWAC members (more than 87%) were actively performing their stipulated roles. In contrast, ACC members' participation was higher, at more than 95%. However, some CWAC members cited the lack of allowances and transportation as a limitation to visiting beneficiaries.

in each district, DSWOs and DSWC members are responsible for various oversight roles. These included recruiting and training stakeholders such as CWAC and ACC members, undertaking community sensitisation and awareness-raising, registering and enumerating beneficiaries, and handling grievances, among others. Table 2 presents the status of role and responsibility performance for both DSWOs and DSWC members.

Table 2: Status of Role and Responsibility Performance, DSWO and DSWC members.

DSWOs (n=11)		DSWC Members (n=18)	
Role/Responsibility	**Participation Rate (%)**	**Role/Responsibility**	**Participation Rate (%)**
Conducting training for all district-level stakeholders (CWACs, ACCs, DWACs, etc.)	100.0%	Assist the DWSOs with recruiting and training stakeholders	100.0%
Organising sensitisation and awareness activities in the district	100.0%	Assist the DWSO with undertaking community sensitisation	100.0%
Monitoring the payments to beneficiaries	100.0%	Assist the DWSO in registering and enumerating new beneficiaries	94.44%
Conduct bi-monthly control visits with the stakeholders	100.0%	Regular monitoring of the register of beneficiaries	94.4%
Collecting and analysing bank statements	100.0%	Supporting the final validation of the list of beneficiaries	77.8%
Preparing and submitting minutes and reports to PSWOs	100.0%	Approve Expenditure as Signatories of the Administration and Transfer Accounts	55.6%

Monitoring the Transfer Account	90.0%	Approving administrative budgets and transfers during meetings	77.8%
Receiving complaints and grievances from stakeholders	100.0%	Support the handling of grievances at the district level and from ACCs	88.9%
Referring difficult complaints and grievances to PSWOs	100.0%	Conducting monitoring visits within the district	100.0%

As indicated in Table 2, the survey found that the vast majority of DSWOs (more than 90%) were actively performing their stipulated roles. In comparison, DSWC members' participation ranged from 55.6% to 100% across various roles. Notably, only 55.6% of the sampled DSWC members reported approving expenditures as signatories of the Administration and Transfer Accounts. Furthermore, only 77.8% reported approving administrative budgets and transfers.

3.2 CORRUPTION RISKS AND VULNERABILITIES IN THE SCT PROGRAMME

The survey indicates that the highest corruption risk was the payment of money to representatives of beneficiaries, also known as 'deputies,' following the death of beneficiaries. There was a 61.6% chance that some deputies would continue to receive payments after the death of the legitimate beneficiaries. This was due to the enabling vulnerability of procedural delays in updating beneficiary status information and an accommodative policy seeking to replace the deceased beneficiary with either the deputy or another family member. Table 3 presents the main corruption risk in the implementation of the SCT Programme.

Table 3: Corruption Risk Factors in the SCT Programme in Zambia

Corruption Risk	Rating (Max=100)	Level of Risk
Inclusion of Wrong Beneficiaries (V)	24.1	Low
Payment of Money to Wrong Beneficiaries (V)	16.2	Very Low
Failure to Declare that Beneficiaries have Died (R)	48.9	Moderate
Payment to Deputies of Deceased Beneficiaries (R)	61.6	High
Theft of Money from Beneficiaries after payment (R)	39.6	Low
Delays in making payments to beneficiaries (V)	59.4	Moderate

Note that R=Corruption Risk and V= Programme Vulnerability, and that the Risk Rankings from 0-20 were categorised as "very low," 21-40 as "low", 41-60 as "Moderate," 61-80 as "high", and 81-100 as "Very High."

Table 3 also indicates a moderate vulnerability (59.6% chance) of delays in making payments to beneficiaries, while the vulnerability of including wrong beneficiaries was low (24.1%). Furthermore, the risk of theft following payments was low (39.6%), while the vulnerability of paying money to the wrong beneficiaries was very low (16.2%). The CWAC and ACC members considered that delays in making payments, coupled with limited communication, were the major sources of complaints and grievances, as beneficiaries were constantly seeking information about delayed payments. Furthermore, Mobile money payments were said to have exacerbated the situation, as some network providers may delay even after others have made payments. Some respondents also noted that unscrupulous family members and deputies were the perpetrators of the few instances of theft of beneficiaries' money, as they gained access to beneficiaries' mobile money wallets or cash.

3.3 DISTRIBUTION OF CORRUPTION RISKS AND VULNERABILITIES IN THE SCT PROGRAMME

The results indicated that Ndola and Chongwe districts had the highest risk of failure to declare that the legitimate SCT programme beneficiary had died. There was a 83.1% chance in Ndola district and a 79.3% chance in Chongwe district. Figure 4 presents the distribution of the risk of failure to declare that the beneficiary has died by province and district.

Figure 4: Distribution of Failure to declare that the Beneficiary has died

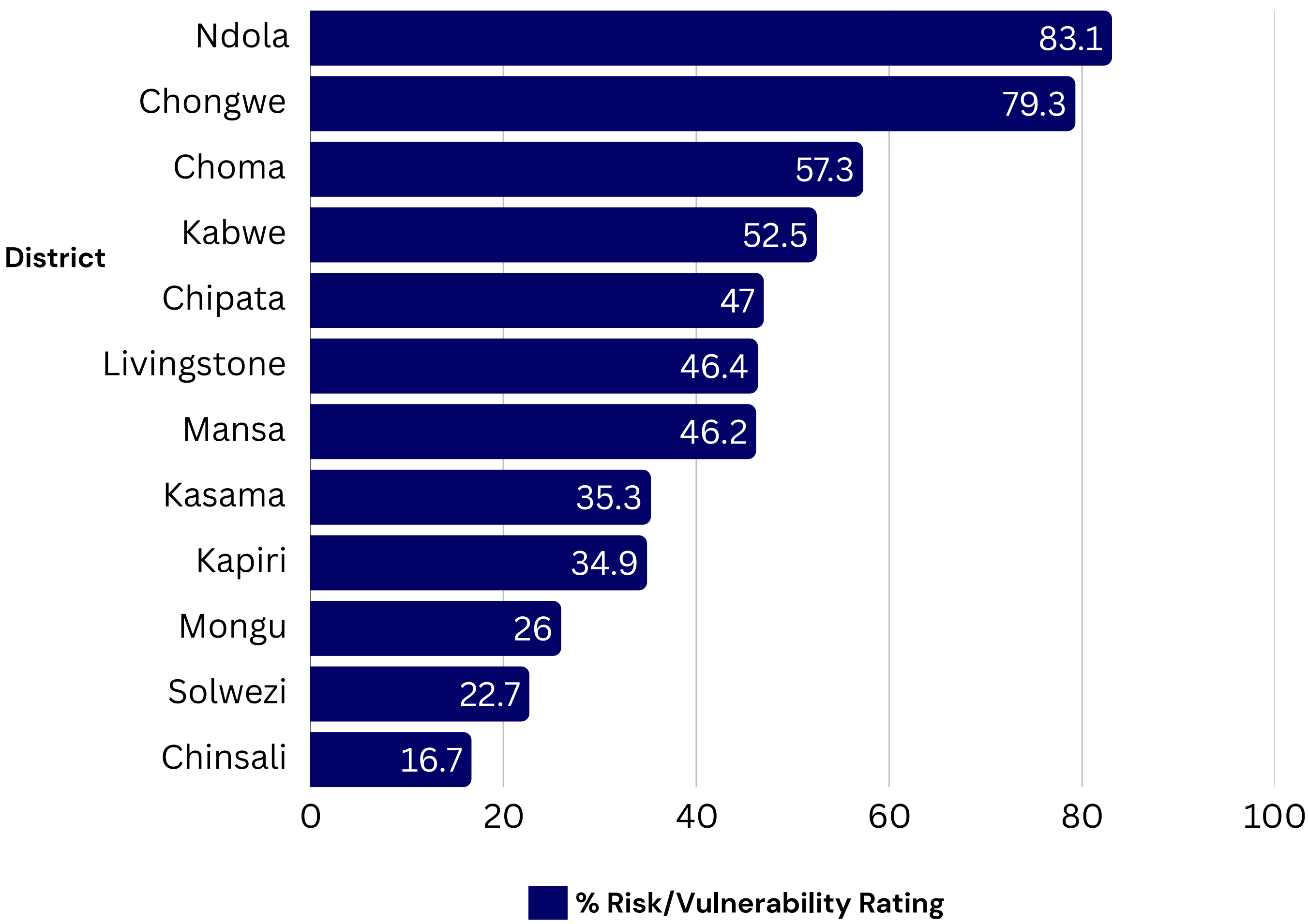


Figure 5: Distribution of Payment to deputies of deceased beneficiaries

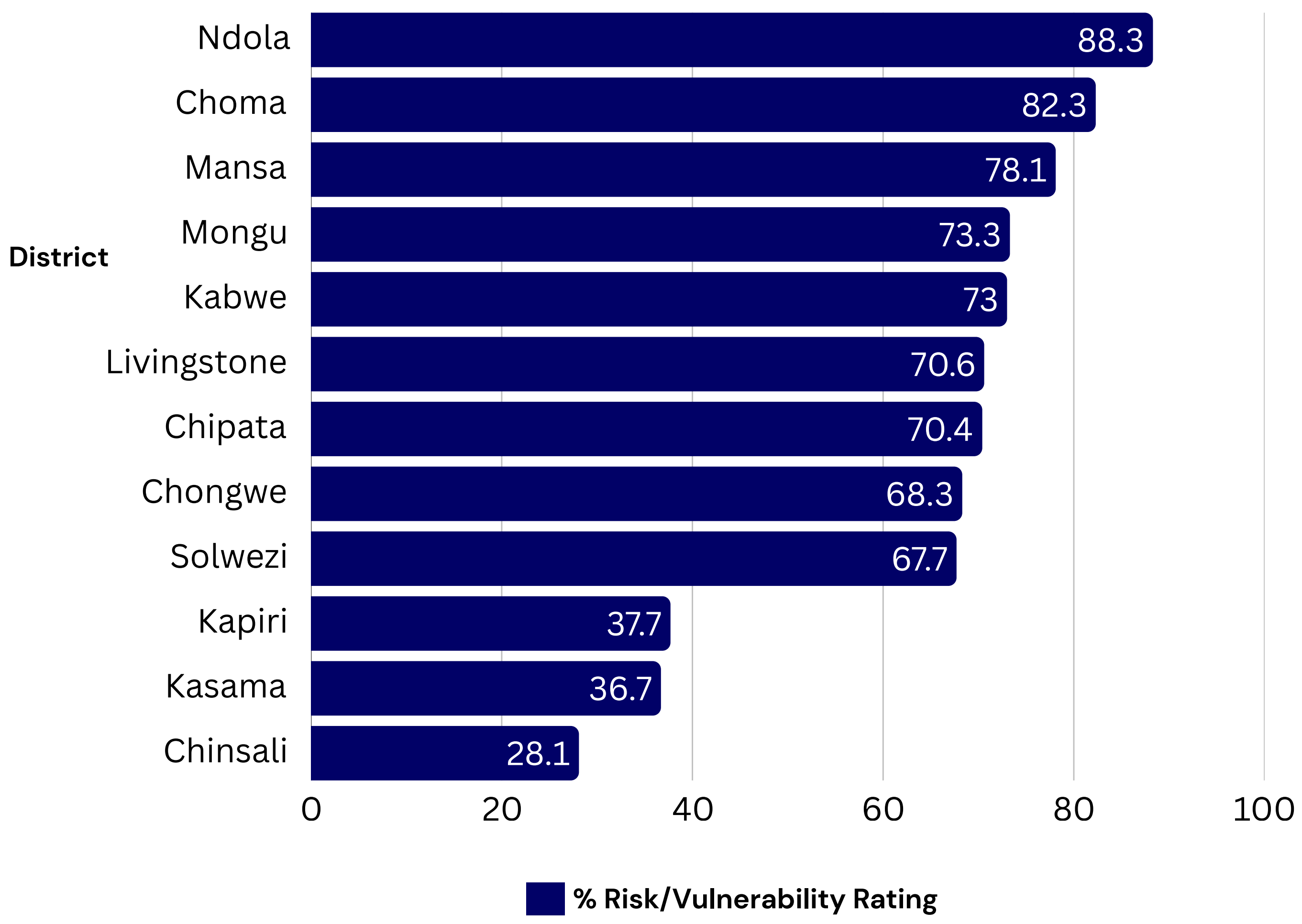


Figure 4 indicates that five districts had medium risks, while four had low risk and one had very low risk ratings. The lowest risk of failure to declare that the beneficiary had died was in Chinsali district (with a16.7% chance).

Figure 5 presents the distribution of the vulnerability of payment to deputies of deceased beneficiaries by provinces and districts. The highest vulnerability was recorded in Ndola at 88.3%, followed by Choma at 82.3%.

Only three districts, namely Kapiri Mposhi (37.7%), Kasama (36.7%) and Chinsali (28.1%), had low ratings, indicating that this vulnerability is widespread.

The survey also found that the vulnerability of delayed payments was widespread across the selected districts, with Kabwe at the top of the list with 84.0% chance, followed by Solwezi district with a chance of 76.5%. Figure 6 presents the distribution of the vulnerability of delays in making payments to SCT beneficiaries by selected districts and provinces.

Figure 6: Distribution of Delays in making payments to beneficiaries

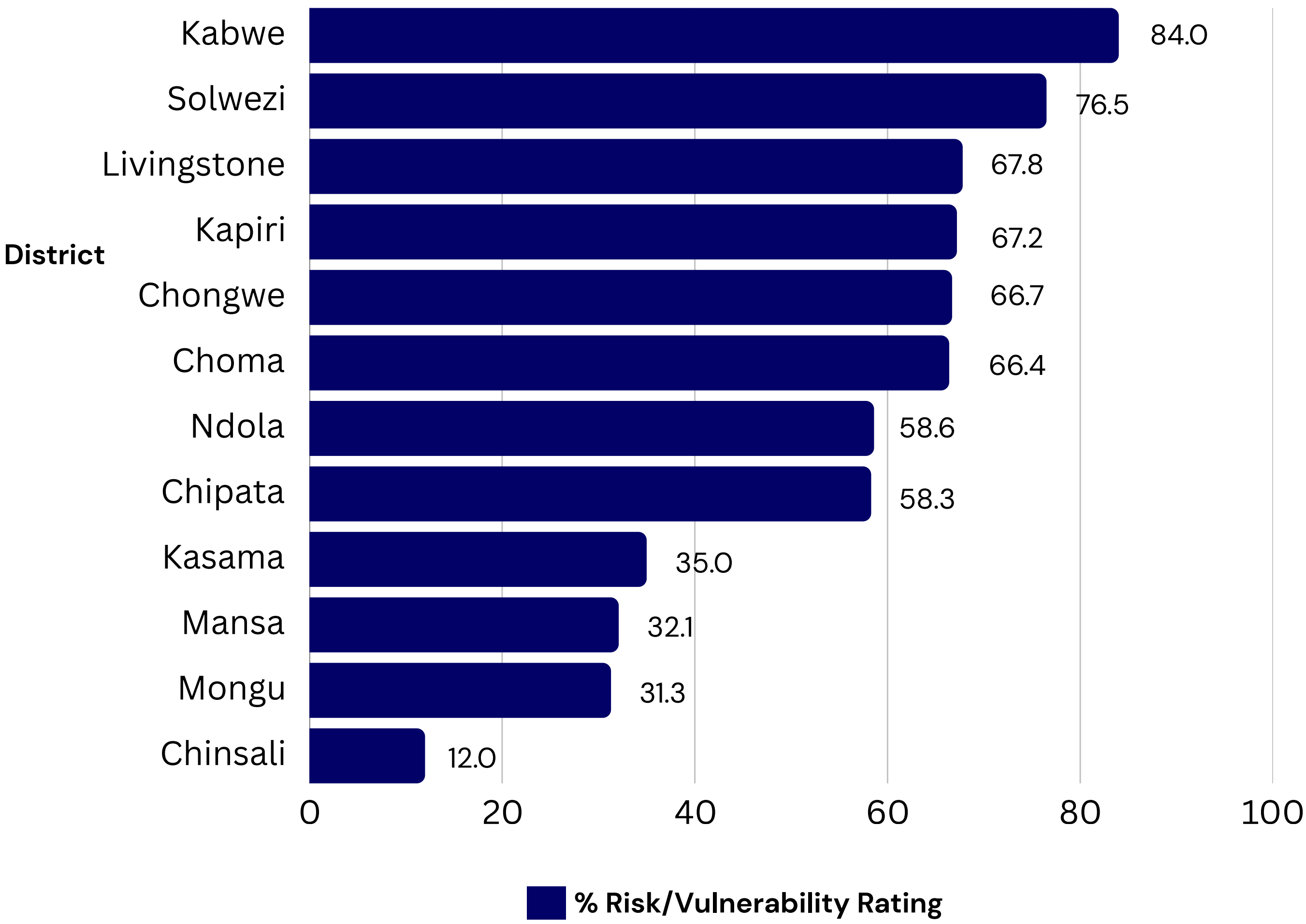


Figure 6 indicates that the only districts with a very low chance of delayed payments were Chinsali (12%), while Mongu (31.3%), Mansa (32.1%) and Kasama (35%) had low chances. This suggests that the distribution of SCT programme funds takes into account the poverty situation and community needs, with districts that are more vulnerable experiencing fewer payment delays. Furthermore, districts that have fully migrated to electronic payments with high service provider efficiency experience fewer payment delays.

3.4 PERCEPTIONS AND EXPERIENCES OF CORRUPTION IN THE SCT PROGRAMME: CASE OF KALUMBILA AND SOLWEZI DISTRICTS

3.4.1 SCT PROGRAMME BENEFITS AND INTRODUCTION OF ELECTRONIC PAYMENTS

In Kalumbila and Solwezi districts, most beneficiaries used the SCT payments to purchase food, medicine, and educational supplies, while others used the money for investment purposes, such as purchasing fertiliser, constructing houses, and investing in pottery and livestock businesses. To sustain these benefits and reduce the risks associated with handling cash payments, the Zambian government introduced electronic payment methods, including mobile network payments and mainstream bank account transfers.[20] In 2023, electronic payments were introduced on a pilot basis, limited to areas with good telecommunications network coverage. Thereafter, they were scaled to all districts nationwide, in line with policy guidance to migrate all beneficiaries.

Several stakeholders supported the implementation of the SCT programme at the district level. CWAC and ACC members served as community volunteers, supporting the identification and enumeration of new beneficiaries, monitoring payments, and other programme activities within the community. In Kalumbila and Solwezi districts, a critical component of the roles of CWAC and ACC members was sharing information and maintaining communication between community members and public officials. However, the role of Pay Point Managers was significantly reduced, as they only made payments to beneficiaries who were still on cash payments. It was envisioned that Pay Point Managers would no longer be part of the structure once all beneficiaries were migrated to electronic payments.

3.4.2 CORRUPTION PERCEPTIONS AND EXPERIENCES

However, the migration to electronic payments introduced several risks of corruption and implementation challenges. The use of electronic payments increased the importance of transparency, accuracy, and fairness in identifying beneficiaries. In Solwezi and Kalumbila districts, CWAC members verified beneficiaries' residency using local knowledge. Given their voluntary status, CWAC members had an incentive to solicit bribes through assuring inclusion, even though they had no authority to enumerate or determine final beneficiaries. Notably, in Kalumbila and Solwezi districts,

[20] Ministry of Community Development and Social Services (MCDSS) Zambia (n.d.) Available at: https://www.mcdss.gov.zm/?wpfb_dl=67 (Accessed: 25 June 2026).

some community members were asked to pay ZMW20 to be included on the SCT programme beneficiaries list. Furthermore, due to delays in distributing identification materials such as identity cards and branded T-shirts, there was a risk that some unscrupulous members of the community would impersonate CWAC and ACC members in soliciting bribes.

This corruption risk was exacerbated by the limited number of beneficiaries on the SCT Programme compared to those in need of welfare assistance in these districts. Although CWAC and ACC members were heavily involved in the community-level sensitisation of potential beneficiaries, the approval of the final list was determined by Proxy Means Tests conducted at the national level, resulting in replacements and inclusion of other beneficiaries on the final list. The lack of transparency in the finalisation of the beneficiaries list and the sensitive role of enumerators created an opportunity for rent seeking and political influence. Furthermore, this also generated stakeholder conflicts because community members often accused district-level officials of corruption when their names did not appear on the final list.

The policy to migrate all beneficiaries to digital payments has also introduced significant implementation challenges, particularly in rural areas and among elderly beneficiaries. Although cash payments continue for some beneficiaries, the Zambian government's policy direction was to migrate all beneficiaries to electronic payments. However, some beneficiaries were unable to consistently receive mobile network payments due to a lack of personal phones, network coverage and illiteracy. Furthermore, there were many incidents of SIM card loss, PIN forgetfulness, and mobile money registrations using other people's names, resulting in payment processing challenges. In addressing these challenges, the Government recently procured and distributed 200,000 phones to some beneficiaries.[21]

Electronic payment ensures that all payments are received directly by the beneficiaries. However, some beneficiaries were assisted by digitally literate family members referred to as "deputies" in managing their mobile money accounts. In Kalumbila and Solwezi, the deputies were usually sons, daughters, nephews, and younger siblings appointed by the beneficiaries. While the role of these deputies was originally limited to collecting cash payments on behalf of beneficiaries in the event of sickness or incapacitation, the introduction of electronic payments shifted their influence. In Kalumbila and Solwezi districts, there were isolated incidents of theft as some deputies transferred funds out of the beneficiaries' accounts, while maintaining the narrative that the government had delayed or not paid the beneficiary.

Furthermore, some deputies also demanded facilitation payments or *commissions* for

[20] Ministry of Community Development and Social Services (MCDSS) Zambia (n.d.) Available at: https://www.mcdss.gov.zm/?wpfb_dl=67 (Accessed: 25 June 2026).
[21] Zambian Monitor (28 May 2026) "Govt rolls out 200,000 phones to elderly Social Cash Transfer beneficiaries" Available at: https://www.zambiamonitor.com/govt-rolls-out-200000-phones-to-elderly-social-cash-transfer-beneficiaries/ (Accessed: 25 June 2026).

assisting beneficiaries, even though their assistance was considered voluntary. In these two districts, beneficiaries also incurred transaction fees due to network challenges and a limited number of cash agents, even though mobile money payments were made through mobile wallets, which did not attract withdrawal charges. Furthermore, some mobile money agents also withdraw money from the mobile wallets of some unsuspecting beneficiaries as they sought assistance. In Kalumbila and Solwezi districts, there were incidents of disagreement between deputies and beneficiaries, attributed to a lack of integrity and theft. Notably, in most cases of disagreement, beneficiaries opted to deal with the matters within the family, even though they had the option to report to district offices and replace the deputies. This was attributed to fear, among some beneficiaries, of the disagreement leading to their exclusion from the SCT programme.

Given the presence of CWAC members within the communities, there was a low incentive to conceal the death of a beneficiary. However, some deputies often took control of the money, leading to disputes with other family members, especially when children are neglected. Upon the notice of death, it was standard practice to stop making payments within 6 months. However, payments continued beyond this period if the deputy or another family member qualified to become a new beneficiary. In Solwezi and Kalumbila districts, the names of family members were submitted for consideration as potential beneficiaries following the original beneficiary's death, and an assessment was conducted to determine eligibility. This ensured that a household was not removed from the programme when other members qualified for the SCT Programme.

It was also notable that the processing of mobile money payments was fragmented across various stakeholders. District Social Welfare Offices prepared payment lists, while the Ministry of Community Development and Social Services confirmed the availability of funds for mobile money operators to process payments. Once funding was confirmed, the District Social Welfare Officers instructed payments through a system, and mobile money service providers then credited the beneficiaries' mobile money accounts. There were notable inconsistencies in payment dates due to differences in how mobile money service providers process payments. When payments to beneficiaries via a particular mobile service provider were made while others experienced delays, this generated complaints, with some beneficiaries requesting to switch back to cash payments. According to some respondents, the system utilised to initiate payments often became overwhelmed when several districts attempted to make payments simultaneously, thereby limiting their ability to do so. Unfortunately, district-level officials were often unable to provide satisfactory explanations for the delays due to limited communication and the lengthy electronic payment processing period.

In Kalumbila and Solwezi districts, CWAC and ACC members also expressed concerns over the payment process, as it did not provide for the verification of the payment lists. Although they received lists showing which beneficiaries were migrated to mobile money, they did not receive payment confirmation lists. Therefore, the only source of information about payments was complaints, thereby compromising the redress mechanisms. Given that some complaints were attributed to illiteracy, as some beneficiaries were simply unaware of the payments because they were unable to read payment notifications, the information gap made it difficult for district-level officials to attend to these complaints.

4. CONCLUSION AND RECOMMENDATIONS

This corruption risk assessment on the SCT programme in Zambia, covering the year 2025, provides evidence of high public participation by critical stakeholders in executing their roles and responsibilities. The survey indicates that the highest corruption risk was the payment of money to representatives of beneficiaries, also known as 'deputies,' following the death of beneficiaries. This was due to the enabling vulnerability of procedural delays in updating beneficiary status information and an accommodative policy seeking to replace the deceased beneficiary with either the deputy or another family member. Further, the case study of the Kalumbila and Solwezi districts indicates that there were risks of bribery, nepotism, conflicts of interest, and political interference in the Social Cash Transfer Programme.

Although the introduction of mobile money payments reduced the risk of handling cash and facilitated the quick processing of payments, it has also heightened corruption risks and implementation challenges, especially for the elderly, the blind, and technologically vulnerable or illiterate beneficiaries. In light of these findings, Transparency International Zambia recommends the following:

1. The Ministry of Community Development and Social Services should ensure that mobile money payments are contextualised to district-level situations in terms of network coverage and cash access points, and to individual situations in terms of technological capacity and literacy of the beneficiaries.
2. The Ministry of Community Development and Social Services should improve the payment process to ensure simultaneous payments across network operators, as well as integrate district-level stakeholders in the electronic payment processes. This will both reduce the number of complaints related to delays and also improve complaint handling.
3. The Ministry should also consistently provide allowances and identification documentation for CWAC and ACC members. This is in light of the elevated corruption risks associated with their voluntary status and the limited financial support to cover transportation and other logistics.
4. The Anti-Corruption Commission, Civil Society Organisations and the Office of the Auditor General should upscale their anti-corruption efforts, including corruption prevention efforts targeting the SCT Programme and other similar welfare and empowerment programmes.

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