

National Anticorruption Strategy (NACS) Review



Contents

Acronyms and abbreviations	iv
Background and Focus	1
Objectives of the Workshop	3
Summary of the Proceedings	4
Welcome Remarks by the TI Z Executive Director	4
The State of Corruption In Zimbabwe: Reflections By Dr. Tsabora	4
Reflections On the NACS Implementation in Zimbabwe by Professor Makochekanwa	7
Subcommittee Implementation Reports	7
Closing Remark by Deputy Chairperson	15
Conclusion	16

Acronyms and Abbreviations

AMU	Asset Management Unit	OPC	Office of the President and Cabinet
AU	African Union	PEPs	Politically Exposed Persons
AUCPCC	African Union Convention on Preventing and Combating Corruption	PFM	Public Finance Management
BUSE	Bindura University of Science Education	PPDPA	Public Procurement and Disposal of Public Assets Act
CGU	Corporate Governance Unit	PRAZ	Procurement Regulatory Authority of Zimbabwe
CPI	Corruption Perception Index	PSMAS	Premier Service Medical Aid Society
ESAAMLG	Eastern and Southern Africa Anti-Money Laundering Group	PWDs	People with Disabilities
FATF	Financial Action Task Force	SADC	Southern African Development Community
FIU	Financial Intelligence Unit	SARs	Special Audit Reports
GoZ	Government of Zimbabwe	SOEs	State Owned Enterprises
IODZ	Institute of Directors in Zimbabwe	TI Z	Transparency International Zimbabwe
LSZ	Law Society of Zimbabwe	UNCAC	United Nations Convention Against Corruption
MDAs	Ministries, Departments and Agencies	UZ	University of Zimbabwe
MEAL	Monitoring, Evaluation and Learning	VID	Vehicle Inspection Department
NACSSC	National Anti-Corruption Strategy Steering Committee	ZACC	Zimbabwe Anti-Corruption Commission
NACS	National Anticorruption Strategy	ZESA	Zimbabwe Electricity Supply Authority
NPA	National Prosecuting Authority	ZIMRA	Zimbabwe Revenue Authority
NPRC	National Peace and Reconciliation Commission	ZUJ	Zimbabwe Union of Journalists
OAG	Office of the Auditor General	ZRP	Zimbabwe Republic Police

Background and Focus

This document is a shadow report published by Transparency International Zimbabwe (TI Z) which aims to assess and review the implementation of the National Anti-Corruption Strategy (NACS), 2020-2024.

Zimbabwe is a State party to the United Nations Convention against Corruption (UNCAC) of 2007, the African Union Convention on Preventing and Combating Corruption (AUCPCC) of 2003 and the SADC Protocol on Corruption (hereafter the SADC Protocol) of 2001. These international and regional treaties, among other things, provide obligations State Parties to adopt policies and laws as part of the tools set required to deal with corruption in their countries. Further, they are a comprehensive set of standards, measures, and rules that all countries can apply to strengthen their legal and regulatory regimes to fight corruption. Article 5 of the UNCAC requires State parties to develop and implement well-coordinated anti-corruption policies, strategies and practices that promote the participation of society, as well as the public and private sectors. Article 36 refers to “specialised” agencies, which require that States “ensure the existence of a body or bodies or persons specialized in combating corruption through law enforcement”. Furthermore, the cooperation of national authorities is required by article 38 of UNCAC, especially in terms of sharing information proving the commission of acts of corruption. The provision directly speaks to the issue of coordination of national institutions (authorities) and actors in the anti-corruption agenda. The Convention also calls for cooperation between state and non-state actors (public-private partnership), especially financial institutions, to share information on incidences of corruption.¹



Zimbabwe launched the National Anti-Corruption Strategy (NACS) for 2020-2024 in July 2020.

¹ See Article 39 of UNCAC.

To harness the strength of various actors in the fight against corruption, Zimbabwe launched the National Anti-Corruption Strategy (NACS) for 2020-2024 in July 2020. The strategy has the following Objectives:



Support citizen empowerment and awareness of their rights and responsibilities relevant to the fight against corruption.



Enhance the structures for deterrence, detection, adherence, and enforcement through improved compliance with anti-corruption and integrity management obligations and mechanisms across sectors.



Increase public demand for more transparency, accountability, and rejection of corruption in government offices, ministries, agencies and State-owned enterprises (SOEs)/parastatals, public institutions, media houses and the private sector.



Ensure protection of whistle-blowers and victims of corruption, thereby encouraging active participation in anti-corruption efforts by members of the public.



Recover assets and proceeds from corruption crimes, and compensate damages inflicted on the state and corruption victims.



Increased level of political parties' transparency, political will, and accountability.

At the time of launching, the NACS acknowledged that the gap in realising the tenets of the UNCAC locally, regardless of the existing local legal and institutional frameworks to fight corruption, was the consensus on the strategy to fight the scourge of corruption (NACS, 2020). The NACS established the National Anti-Corruption Strategy Steering Committee (NACSSC) to breathe life into the NACS according to a specified framework. The core objective of the NACSSC was to “oversee the implementation of the NACS under the auspices of ZACC which will ensure periodic meetings and regular reports to be made available to the public (NACS, 2020). For the past three years, TI Z working closely with the ZACC has convened various spaces of engagement and supported initiatives aimed at realising the targets of the Strategy. As the country reaches the twilight end of the strategy, TI Z and ZACC convened a high-level engagement workshop for key stakeholders involved in the anti-corruption agenda.

This activity report gives an account of the key issues raised by government stakeholders and CSO actors who have been involved in the implementation of the NACS in Zimbabwe.

Objectives of the Workshop



To improve capacity and responsiveness by state institutions and anti-corruption actors in responding to corruption.



To enhance coordination among members of the Subcommittees in implementing the National Anti-Corruption Strategy.

Key government departments, academics, civil society organisations (CSOs) and professional institutions such as the Law Society of Zimbabwe (LCZ) and the Zimbabwe Union of Journalists (ZUJ) were represented at the NACS review meeting. The following government departments participated in the meeting:

ZACC

The National Prosecutions Authority (NPA)

Representatives of the Office of the President and Cabinet (OPC)

The Zimbabwe Revenue Authority (ZIMRA)

The Financial Intelligence Unit (FIU)

Civil society was represented by delegates from a wide spectrum of constituencies, such as:

The, women, youth, and people with disabilities (PWDs).

Academia was represented by lecturers from the University of Zimbabwe (UZ) and Bindura University of Science Education (BUSE).

Summary of the Proceedings



Tafadzwa Chikumbu- Executive Director for TI Z giving the welcome remarks

Welcome Remarks by the TI Z Executive Director

Mr. Tafadzwa Chikumbu welcomed the workshop participants and informed the meeting that the objective was to measure progress in the implementation of NACS to date. The Executive Director further emphasized the need for the five Subcommittees to reflect on their operations from 2020 and come up with recommendations for effective implementation of the strategy. It was noted that Subcommittee 6 has never met since the inception of NACS in 2020 and the meeting was tasked to map out mechanisms to ensure that the committee is operational. He said that the meeting was aimed at lobbying the Government of Zimbabwe (GoZ) to explore options for sustaining the momentum set by NACS including having a successor to the National Anti-Corruption Strategy. To do this, there was a need to learn from past mistakes and design alternatives for a renewed anti-corruption agenda in Zimbabwe.

The State of Corruption in Zimbabwe: Reflections By Dr. Tsabora

Dr. James Tsabora shared his reflections on the political and economic context of the country. He indicated that key state institutions have not been changed after the 2023 General Election held in August. He further informed the participants that the economy is characterised by hyperinflation, high unemployment, a large informal economy, disruption of agricultural output and food shortages and political uncertainty which have resulted in high poverty rates over the years.



Dr Tsabora sharing reflections on Corruption in Zimbabwe

Governance and Rule of Law (Mo Ibrahim Index 2023)



Zimbabwe's overall governance score was

48.1 /100 IN AFRICA

where 100.0 is the best possible score (MIIAG)



The African average score was

48.9%



The overall Governance ranking is

29 /54
IN AFRICA



Low sub-scores on security and rule of law is

46.4%



This reflects deficiencies in human security and safety, rule of law, justice, accountability and transparency, and anti-corruption initiatives according to the 2023 Mo Ibrahim Index.

Corruption and Governance Indicators

In 2022, Zimbabwe was ranked 157 out of 180 countries on the Corruption Perception Index (CPI), with a score of 23 out of 100 points, indicating a high level of perceived public sector corruption. On the Bertelsmann Stiftung's Transformation Index (BTI) for 2023, Zimbabwe stagnated or suffered a mild deterioration of political and governance indicators, including the control of corruption since 2018. According to the World Bank 2023, Zimbabwe underperforms its regional and African country peers on regulatory quality, the rule of law, control of corruption, voice, and accountability. This implies that despite having an anti-corruption strategy, anti-corruption efforts are not bearing fruits in Zimbabwe.



Zimbabwe scored

23/100

in the 2022 Corruption Perception Index (CPI)

State of Economic Governance & Rule of Law

According to Afrobarometer, 2023, 72% of Zimbabweans polled by Afrobarometer believed that the country was heading in the wrong direction. This was a 10-point increase from 2018 when the Second Republic came in 2018. The TI Z 2021 Bribe Payers Index Survey revealed that 54.4% of the 2500 citizens interviewed indicated that they had been asked to pay a bribe. Half the respondents do not trust the government's sincerity in curbing corruption. Citizens have low trust in the key institutions responsible for countering corruption and 43.1% expressed a lack of confidence in the ZACC. The Zimbabwe Republic Police (ZRP) was perceived by citizens as the most corrupt institution in Zimbabwe followed by the Vehicle Inspection Department (VID) & the Registrar General's Office. Bribery was identified as the most common form of corruption. Patriarchal and unequal society tends to reinforce the negative impact of corruption on women compared to men due to multiple challenges.



OUT OF

2,583

respondents surveyed by TI Z in 2021,

54.4%

indicated that they had been asked to pay a bribe

Anti-Corruption and Oversight Institutions

Anti-corruption and oversight institutions in particular the Office of the Auditor General (OAG) have consistently exposed the prevalence of corruption and corruption risks. Annually the OAG exposes poorly managed accounting records; diversion of public funds for unintended purposes; payments for undelivered goods and the failure to follow procurement procedures in parastatals, ministries, departments and agencies (MDAs) and local authorities.



Anti-corruption and oversight institutions have consistently exposed the prevalence of corruption and corruption risks

Auditing Public Procurement & Corruption Risks

The OAG also exposed corruption in the form of payments without invoices, non-delivery of paid goods, single supplier bias, unjustified price variations, full payments ahead of delivery, poor due diligence, inadequate supporting documents and unauthenticated documents.

Public Procurement Auditing Challenges

There are recurring observations and no action, no redress and no commitment to change by the institutions. The recurring observations have been in the form of management overriding procedures by verbal instructions, intimidation, unvouched expenditure, lack of participation and cooperation from audited clients and unclear records.

Legal and Institutional Framework and Loopholes

As regards the legal and institutional frameworks for combatting corruption in Zimbabwe, the Constitution of Zimbabwe (No. 20) Act of 2013 established ZACC and the NPA as the main institutions responsible for combatting corruption in Zimbabwe. Alongside ZACC and the NPA, other key institutions include the Office of the Auditor General (OAG), the Corporate Governance Unit in the Office of the President and Cabinet (OPC), the Procurement Regulatory Authority of Zimbabwe (PRAZ), the Financial Intelligence Unit (FIU), the Zimbabwe Republic Police (ZRP) and the Zimbabwe Revenue Authority (ZIMRA) to name just a few. There is also a specialised division of the High Court known as the Anti-Corruption Division of the High Court created in line with the High Court Act [Chapter 7:06].

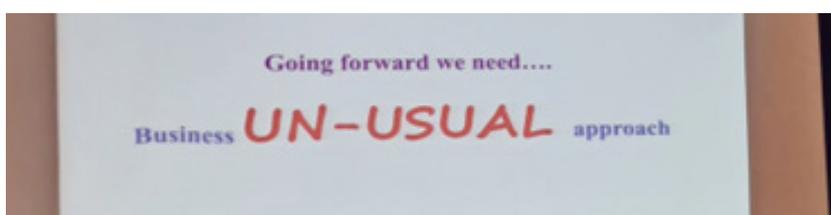
Other key pieces of legislation include the Criminal Law (Codification and Reform) Act, the Prevention of Corruption Act, the Public Procurement and Disposal of Public Assets Act (PPDPA), the Money Laundering and Proceeds of Crime Act, the Public Finance Management (PFM) Act and the Audit Office Act. To complement the local legislation, Zimbabwe has been a party to the UNCAC, the AUCPCC, the SADC Protocol, and the 2007 African Charter on Democracy, Elections and Governance since 2022. Furthermore, the country has been subjected to reviews conducted by the Financial Action Task Force (FATF) which is overseen by the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), of which it is a regional member. However, the absence of the **Whistle blower Protection and Witness Protection Laws** in the country is decelerating its progress on the fight against corruption. Furthermore, the 2023 Amendment to the Criminal Code on criminal abuse of public office has created difficulties in convicting offenders.



The Office of the Auditor General has exposed corruption in the handling of transactions by various departments



The delay in promulgating legislation to protect Whistleblowers and Witnesses is viewed as decelerating Zimbabwe's progress in the fight against corruption



Reflections On the NACS Implementation in Zimbabwe by Professor Albert Makochekanwa

Prof. Makochekanwa informed participants that corruption is posing more excessive harm to society and a decisive move needs to be undertaken to fight it holistically. He cited the former Minister Dzingai Mutumbuka who lost his Chisipite house to fraudsters due to alleged corruption at the Deeds Office. The example reflects that corruption is now enshrined in institutions and organised syndicates are spearheading it. A good score and ranking on the Corruption Perception Index (CPI) plays a key role in attracting the needed investment into the country. Therefore, implementers of NACS must work effectively and efficiently in fighting corruption. Subcommittee Members present were urged to critically evaluate, assess, and come up with proposals and recommendations to tackle the challenges they faced in the implementation of strategies to fight corruption. In addition, participants were tasked to also analyse whether the process of coming up with NACS documents, its implementation roadmap and coordination by secretariat is effective.



A good score in the annual CPI plays a key role in influencing the decisions of investors into the country



Makhosini Hlongwane of the Zimbabwe Union of Journalists presenting the report for Sub-Committee 1

Subcommittee Implementation Reports

Presentation by Subcommittee 1

Subcommittee 1 which is mandated to **Support citizen empowerment and awareness of their rights and responsibilities relevant to the fight against corruption** accomplished the following initiatives:

- ▶ Mass media (52 TV episodes annually and several radio programmes on different stations, national and provincial)-using local languages.
- ▶ Physical campaigns (rural and urban) where 56 rural districts covered and four cities covered (Mutare, Harare, Bulawayo, and Gweru).
- ▶ Coalitions built with churches and multiple stakeholders for awareness.
- ▶ Empowerment and incentivise the media through excellence awards for the media.
- ▶ Consultations to include anti-corruption in the school curriculum (NACS Steering Committee recommendation).

The impact of these initiatives was an increase in the number of people reporting corruption.

However, the challenges identified that affect the anti-corruption efforts are:

- ▶ Fear - lack of robust legislation on Whistleblower and Witness Protection bills

- ▶ Budgets were limited - media and awareness campaigns need consistency and therefore adequate resources.

- ▶ Tracker - Lack an objective criterion to track improvement in citizen awareness.

- ▶ State capture - citizens' perceptions of state capture caused resistance to awareness campaigns.

- ▶ Heightened intolerant political atmosphere - 2023 elections, ground not conducive for activities, added to resistance to messaging.

- ▶ Limited inclusivity - limited resources and materials for all groups e.g. Braille, sign language, minority languages.



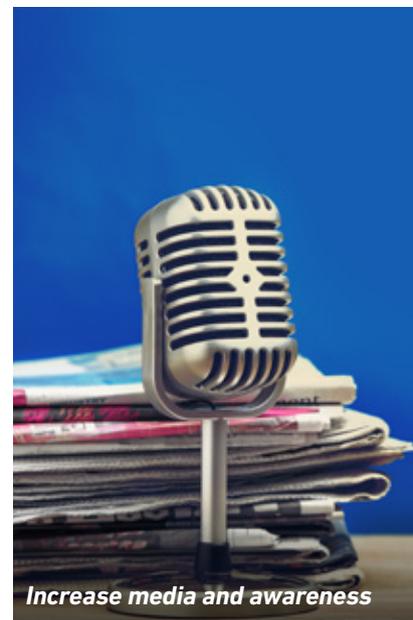
The subcommittee recommended the following:

- ▶ The government needs legislation to protect whistleblowers and witnesses, as well as encourage proactive reporting.

- ▶ Media and Awareness - Increase budget to increase visibility and awareness.

- ▶ • Intolerance - engage political parties, capacitate NPRC, depoliticize anticorruption.

- ▶ Lack of objective measures - Develop an objective mechanism to track attitude change.





*A representative of Subcommittee 2
Reporting on their Activities*

Presentation by Subcommittee 2

The Subcommittee 2 which is mandated to **Enhance the structures for deterrence, detection, adherence, and enforcement** through improved compliance with anti-corruption and integrity management obligations and mechanisms across sectors accomplished the below initiatives.

- ▶ Conducted joint operations and sharing of information amongst the responsible stakeholders through workshops, trainings, and meetings regularly. Stakeholders include ZRP, ZACC, ZIMRA, the FIU and OAG among Others.
- ▶ Joint efforts resulted in operations focusing on the Premier Service Medical Aid Society (PSMAS), the Civil Servants' vehicle rebates and the popular 'Pangolin Operation' which wiped out various EcoCash bulk payers who were successfully prosecuted.

The challenges faced were:

- ▶ Lack of adequate mechanisms to detect crime.
- ▶ It takes time to detect crime resulting in the tampering with evidence by the perpetrators e.g. Cases involving local authorities.
- ▶ Delay or refusal to supply of information timeously by other MDAs or companies involved in investigations leading to the destruction of evidence or poor investigations without adequate evidence.
- ▶ Delay in the finalization of investigations sometimes due to lack of mutual legal assistance (MLA) signed with other jurisdictions.
- ▶ Lack of public awareness by the general populace on the technical aspects of corruption.
- ▶ Delay in the finalisation of corruption related trials.
- ▶ Frustration of witnesses with the slow pace of processing cases.
- ▶ Hostile witnesses.
- ▶ Banks and real estate agents are not reporting excessive cash transactions.



The lessons learnt by the Subcommittee is that investigations should be properly made through the joint efforts from all stakeholders and an arrest may only be made once there is adequate evidence to avoid the perceived “Catch and Release” and to **“Investigate to arrest and not arrest to investigate.”** The proposed recommendations are:

- ▶ Legislative reforms by enacting law specifically related to the Investigations and prosecution of Anti-corruption cases e.g. anti-corruption court rules.

- ▶ Amendment of the law to give a clear and precise definition of what a public officer is. The definition should encompass all those employed in state owned entities e.g. the Zimbabwe Electricity Supply Authority (ZESA), Net*One etc.

- ▶ Other MDAs and stakeholders should be compelled to supply information required for investigations timeously/ within a stipulated time.

- ▶ Digitization of all stakeholder information platforms for easier access to information for the purposes of investigations and prosecution. At the time of reporting, there was dependence on letters which take long to be responded to or are not responded to at all.

- ▶ Review of the Prevention of Corruption Act.

- ▶ Training on detection and investigation of crimes for anti-corruption agencies.

- ▶ Strengthening relations with other jurisdictions through MLA for easier gathering of evidence and detection of crime by investigators from foreign countries.

(All photos) The meeting in December 2023 meeting was an opportunity for government stakeholders and CSO actors involved in the implementation of the NACS in Zimbabwe to reflect on its implementation.

Presentation by Subcommittee 3

The Subcommittee 3 which is mandated to **Increase public demand for more transparency, accountability, and rejection of corruption in government offices**, which includes MDAs, SOEs/ parastatals, public institutions, media houses and the private sector accomplished the below initiatives:

- ▶ A total of **1,111 Integrity Pledges** by members of Parliament and public officials from various bodies were signed and is an ongoing exercise.
- ▶ Establishment of integrity committees in **150 institutions from 2021** at the time of reporting, against a target of 100 annually through joint training by ZACC, ZIMRA and TI Z.
- ▶ Training of Board Members through workshops by the OPC's Corporate Governance Unit (CGU) thereby enhancing transparency and accountability.
- ▶ The Procurement Regulatory Authority (PRAZ) engaged in public awareness programmes on the new procurement legislation and its implementation and offered capacity building of Law enforcement agencies in understanding the PPDPA Act.
- ▶ Training of court officials at Anti-Corruption courts to ensure integrity and accountability.
- ▶ The Institute of Directors in Zimbabwe (IODZ) facilitated the establishment of Integrity Committees in the private sector.



Mrs. Gladys Nyakoty, ZACC General Manager, Prevention of Corruption, giving the Subcommittee 3 report"

The Subcommittee encountered the following challenges:

- ▶ **Effective coordination of stakeholders:** The subcommittee consists of stakeholders who have different primary goals. Therefore, it was difficult for the coordination of subcommittee 3 to fully dedicate staff to the NACS.
 - ▶ there was a risk of missing out on the activities being conducted by other stakeholders in other regions.
- ▶ **Inadequate funding:** The committee relied heavily on members' internal budgets which was a barrier. NACS does not have a specific stand-alone budget.
 - ▶ The NACS remain in Harare and dissemination is at the pity of subcommittee members if they have programmes in other regions. All subcommittee meetings were conducted in Harare which is a limiting factor on inclusivity of the NACS.
- ▶ **Lack of decentralisation of NACS at provincial level:** The subcommittee members are based in Harare and
 - ▶ A ME&L framework is key for the implementation of a key strategy like the NACS. The subcommittee implementation was not monitored against an M&E framework.



A participant discusses the Subcommittee 3 report

The subcommittee submitted the following recommendations:

- ▶ Need to roll out the integrity pledge tailored for different sectors and population segments (e.g. academia, school children, etc.)

- ▶ Need to roll out the establishment of integrity committees to both private and public sector. Currently, the committee has been focusing on the public sector, the participants gave a recommendation for the committee to engage the private sector.

- ▶ Inadequacy of funding for training and rolling out.

- ▶ Monitoring, Evaluation, Accountability and Learning Framework to enable effectiveness of the implementation of the strategy.

- ▶ Providing adequate funding to operationalize the strategy.

- ▶ Decentralization of the NACS at provincial levels; and

- ▶ Improved coordination amongst Subcommittee Members.

Presentation By Subcommittee 4

Subcommittee 4 is mandated to **Ensure protection of whistleblowers and victims of corruption**, thereby encouraging active participation in anti-corruption efforts by members of the public accomplished the following initiatives:

- ▶ Crafted a draft Bill on Witness Protection and Whistleblowers through the collaboration of ZIMRA, the Law Society of Zimbabwe (LSZ), ZACC and the Ministry of Justice, Legal and Parliamentary Affairs.

- ▶ Overwhelming stakeholder buy-in and cooperation demonstrated by the participation of a wide spectrum of society.

- ▶ Sourced funding from the African Development Bank (AfDB) for a consultant to work on the progression of the three draft bills (Witness Protection Bill, Whistleblowers Protection Bill and the Anti-Corruption Commission Amendment Bill) by March 2024.



Members of Subcommittee 1 listen attentively to a presentation

The challenges encountered are:

- ▶ The NACS did not have a designated budget. There was overreliance on ZACC's budget, as well as cooperating partners.
- ▶ Resolutions from the NACS to the NACSSC were taken on board but there was a lack of monitoring and evaluation mechanisms to track implementation.
- ▶ The terms of reference of the NACS Secretariat were absent from the strategy documents.

The subcommittee submitted the following recommendations:

- ▶ There is need to review the scope of the NACS to investigate the broader legal framework dealing with corruption laws in Zimbabwe.
- ▶ Funding is required to meet the evolving needs of the NACS (a broader introspection of the Corruption laws of Zimbabwe).
- ▶ The thematic area was narrowly crafted, it is limited to witness protection and whistle blowers when in fact there are so many gaps in the legislative framework which needed to be addressed.
- ▶ Our membership does not include Parliamentarians, but they are a key stakeholder who should be brought on board. It is our recommendation that Parliamentarians should be in all Sub Committees and Strategic Pillar 6 should be dissolved.
- ▶ NACS going forward the Steering committee should have clearer and broader TORs.
- ▶ The inclusion of Traditional Leaders in the NACS Steering Committee.
- ▶ Representation in the Committee has always been centralised in Harare. There has not been any representation in all the other 9 provinces of the country.
- ▶ There is a need to develop a Monitoring, Evaluation, Accountability, and Learning (MEAL) framework for NACS II.

Presentation by Subcommittee 5

The committee focuses on **tracking, and confiscation of illegal assets originating from corruption crimes**, locally and abroad, ensuring the compensation of the persons who have suffered prejudice. The committee collaborates with the courts, law-enforcement bodies, and the Reserve Bank of Zimbabwe (RBZ) to ensure the return of assets gained through fraud and corruption in public entities.



Subcommittee 5 coordinates NACS initiatives on stolen assets”

Effectiveness of NACS Implementation by the Subcommittee

- ▶ Inter-agency cooperation was immensely improved among all the institutions which deal with the recovery of proceeds of crime i.e., AMU, ZIMRA, ZRP and NPA.
- ▶ The Subcommittee managed to collect and collate statistics of Court orders granted (interim and final) for the recovery of proceeds of crime.
- ▶ Demonstration of commitment by the Ministry of Finance and Economic Development (MoFED) which volunteered to be Co-Chairperson of Subcommittee 5.
- ▶ Meetings during COVID-19 where different institutions volunteered to host NACS meetings.

Implementation

- ▶ Absence of a provision for a Co-Chairperson in the NACSSC meetings.
- ▶ Reluctance to participate by some private sector players in the NACSSC activities.
- ▶ Lack of high-value recovery of proceeds of crime from Politically Exposed Persons (PEPs).
- ▶ The lack of dedicated funding for the NACS, meant that the implementation of activities relied on funding from ZACC and cooperating partners.
- ▶ Protracted finalization of money laundering cases.
- ▶ Complex MLA processes.
- ▶ The management of seized assets is costly.



Recommendations



The provision for the office of the Subcommittee Co-chair to take up office in the absence of the chair.



Add more professional bodies representing civil engineers, architects, doctors and others to foster professional integrity.



The provision for the office of the Co-chair to take up office in the absence of the chair.

Closing Remark by the Deputy Chairperson of ZACC

Mr. Kuziva Murapa acknowledged all participants and thanked all the NACS subcommittees for the work done to date. He applauded the determination shown by the various subcommittees as expressed in their reports and highlighted the importance of recommendations proffered. He said that the various concerns in the implementation of the NACS, such as the issue of a dedicated budget, an independent NACS Secretariat and the need to expedite signing of integrity pledges must be addressed. He concluded by wishing all participants happy holidays.



Conclusion

As the report shows, the country has significant developments in terms of a legislative and institutional framework for fighting corruption, including a national strategy to rally various actors to work together to achieve specific milestones in localising the tenets of the UNCAC. However, a sober assessment of progress will show that the country still has some way to go in effectively tackling the scourge of corruption despite the framework in place. Testimony of the work still to be done is the continuous poor fortunes of the country on various governance indices such as the CPI, the AFROBAROMETER and the Ibrahim Index of African Governance (IIAG) to name a few where Zimbabwe performs below the regional average. The country's own anti-corruption oversight institutions also continue to expose recurring corruption and corruption risks in the public sector with no redress and or commitment to change by the institutions involved.

Notable gaps and weaknesses in the implementation of the NACS include the missing legislation for whistleblower and witness protection. There are also problems with the existing legal framework which needs review, particularly the 2023 Amendment to the Criminal Code on criminal abuse of public office. Further to this, in terms of coordination amongst key actors, it is concerning to note that Subcommittee 6 of the NACSSC on political parties' transparency, political will, and accountability has never met to move forward its activities. Other challenges experienced by the NACSSC related to limited resources for subcommittees to implement joint activities, delays in finalizing corruption-related trials, investigations affected by the lack of MLA with other jurisdictions, the slow recovery of proceeds of crime from PEPs, and the lack of an objective criterion to track impact to name just a few. Using these as lessons learned there are opportunities to address these deficiencies to deepen implementation of the NACS.

Given the foregoing, this shadow report makes a call to action for the authorities to prepare a successor to the first NACS, informed by the lessons learnt from the first iteration of the first strategy. All the recommendations for improvement tabled by the subcommittees in this report must be looked at carefully and implemented to improve the localization of the UNCAC, bettering the changes of Zimbabwe to perform better in various global governance and corruption indices.

TI Z takes the opportunity to acknowledge the input of various government stakeholders and CSO actors who participated in reviewing the implementation of the NACS, as well as the production of this report. Indeed, these actors also attained notable milestones contributing as members of the various subcommittees and this is commendable. They are encouraged to maintain the spirit of cooperation in any successor to the current NACS.



A sober assessment of progress will show that the country still has some way to go in effectively tackling the scourge of corruption despite the framework in place.



This shadow report makes a call to action for the authorities to prepare a successor to the first NACS.



96 Central Avenue
P O Box CY 434, Causeway Harare, Zimbabwe
Tel: +263 242 793 246/7, +263 78 209 1460
VOIP Calls: 08677004072

 @TIZIM_info

 www.tizim.org