# NAMIBIA





INSERT PICTURE POST CONSULTATIONS

# Proposed Draft National Anti-Corruption Strategy and Action Plan 2021-2025 (NACSAP)

Prepared by the Anti-Corruption Commission Directorate of Public Education and Corruption Prevention March 2021

#### **Table of Contents**

Acronyms and Abbreviations2
Foreword6
Acknowledgement7
1. Strategic Context
1.1 Introduction9
1.2 Structure of the document
1.3 Background and Revision of the NACS 2016-201910
1.4 Legal framework
2. Strategic Objectives
2.1 Strategy Framework
Strategic Objective 1: Increasing the level of political accountability and transparency21
Strategic Objective 2: Preventing corruption in government offices, ministries and agencies,23
public enterprises, regional councils and local authorities23
Strategic Objective 3- Strengthening efforts to deter corruption
Strategic Objective 4-Conducting extensive anti-corruption education
Strategic Objective 5-Preventing corruption in the private sector
Strategic Objective 6- Engaging Civil Society & the Media in Combating Corruption
Strategic Objective 8: Engagement and participation of youth in anti-corruption programmes42
3. Strategy Structure and Action Plan
3.1 Strategy Structure and Monitoring44
3.2 Monitoring and reporting:47
3.2 Action Plan (KPI template)0

## Acronyms and Abbreviations

ACC	Anti-Corruption Commission
ALAN	Association of Local Authorities Namibia
ARC	Association of Regional Councils
AU	African Union
BIPA	Business and Intellectual Property Authority
CEOs	Chief Executive Officers
CCN	Council of Churches in Namibia
CPI	Corruption Perception Index
CSOs	Civil Society Organizations
ECN	Electoral Commission of Namibia
FAO	Food Agriculture Organisation
FIC	Financial Intelligence Centre
IAEA	International Atomic Energy Agency
IPPR	Institute for Public Policy Research
IUM	International University of Management
KPC	Kimberly Process Certificate
KPI	Key Performance Indicators
LAs	Local Authorities
MAWLR	Ministry of Agriculture, Water, Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MFMR	Ministry of Fisheries and Marine Resources
MHETI	Ministry of Higher Education, Training and Innovation
MICT	Ministry of Information and Communication Technology

MME	Ministry of Mines and Energy
MoEAC	Ministry of Education, Arts and Culture
MOF	Ministry of Finance
MoHISS	Ministry of Home Affairs, Immigration, Safety and Security
MoHSS	Ministry of Health and Social Services
MOJ	Ministry of Justice
MOPE	Ministry of Public Enterprises
MPs	Members of Parliament
MSYNS	Ministry of Sport, Youth and National Service
MURD	Ministry of Urban and Rural Development
MWT	Ministry of Works and Transport
NaCC	Namibian Competition Commission
NACS	National Anti-Corruption Strategy and Action Plan 2016-2019
NACSAP	National Anti-Corruption Strategy and Action Plan 2021-2025
NACSC	National Anti-Corruption Steering Committee
NALAO	Namibian Association of Local Authority Officials
NAMFISA	Namibia Financial Institutions Supervisory Authority
NAMPOL	Namibian Police Force
NANSO	Namibia National Students Organisation
NATIS	National Traffic Information System
NCCI	Namibia Chambers of Commerce and Industry
NCF	Namibia Construction Federation
NDP5	Namibia's Fifth National Development Plan
NEF	Namibia Employers' Federation
NGOs	Non-Governmental Organisation

NIC	Namibia Investment Centre
NID	Namibia Institute for Democracy (NID
NIED	National Institute for Educational Development
NIPAM	Namibia Institute for Public Administration and Management
NPC	National Planning Commission
NSC	Namibia Sport Commission
NTF	Namibia Trade Forum
NUNW	National Union of Namibian Workers
NUST	University of Science and Technology
NYC	National Youth Council of Namibia
OAG	Office of the Auditor-General
OMAs	Offices/Ministries/ Agencies
OOJ	Office of the Judiciary
ОРМ	Office of the Prime Minister
PEs	Public Enterprises
POCA	Prevention of Organised Crime Act
PPU	Public Procurement Unit
PSSR	Public Service Staff Rules
RCs	Regional Councils
SDGs	Sustainable Development Goals
SME	Small and Medium Enterprises
TAW	Treasury Authorization Warrants
UN	United Nations
UNAM	University of Namibia
UNCAC	United Nations Convention against Corruption

UNDP	United Nations Development Programme
------	--------------------------------------

UNPAF United Nations Partnership Framework

## Foreword

NB: (To be crafted post consultation with stakeholders nationwide).

#### Acknowledgement

The Anti-Corruption Commission, the lead agency in the fight against corruption and coordinating body of the National Anti-Corruption Strategy, would like to extend appreciation to all stakeholders who participated and contributed to both the evaluation of the National Anti-Corruption Strategy and Action Plan 2016-2019, which culminated in the formulation of the second National Anti-Corruption Strategy and Action Plan 2021-2025. The contributions enriched the Strategy document. It further ensures representativeness, inclusivity of issues across all spheres of society, tackling current challenges and promoting invaluable principles and values that would translate into social progression for all Namibians. Special recognition also goes to the UNDP for the continued support in the implementation Strategy since its inception.

## **Section 1: Strategic Context**

#### 1. Strategic Context

#### **1.1 Introduction**

This National Anti-Corruption Strategy and Action Plan 2021-2025 (NACSAP) serves as a tool for fostering cooperation and continued synergy across all sectors and spheres of society in Namibia in attaining the national vision for a corrupt-free Namibia. The fight against corruption requires concerted efforts to maintain 'healthy' societies and nation premised on ethics, accountability, transparency and maintained integrity systems for accelerated sustainable national development.

Interventions in the Strategy are multifaceted and inclusive of the various national policies, social dynamics, mechanisms and legal instruments across the various sectors to close the loopholes of corruption by strengthening and reforming existing systems and legislation. The actions and strategic objectives cut across the public, private sectors, civil society, faith-based organisations, regional, traditional, youth and industry-specific issues.

#### 1.2 Structure of the document

**Section 1** – the section zooms into the normative context of the corruption landscape in Namibia. These include the causes of corruption, legal framework, social and economic dynamics and country context.

**Section 2** – This section is the heart of the document, setting out the umbrella of the Strategy framework namely; Strategy vision, mission, objectives, pillars and actions.

**Section 3** - is dedicated to the Strategy implementation. These include the structure and monitoring bodies, key performance indicators of the action plan, which is central to the accountability and execution of the actions hereto contained.

#### 1.3 Background and Revision of the NACS 2016-2019

The Republic of Namibia implemented its novel National Anti-Corruption Strategy and Action Plan 2016-2019 (NACS) to promote integrity, accountability and transparency across all spheres of society. The Strategy, which was developed in line with the United Nations Convention against Corruption (UNCAC), was approved by Cabinet in August 2016, was implemented between 2017 and March 2020. The Strategy had 75 actions implemented by 22 implementing institutions. Article five of UNCAC requires State Parties to develop and implement a comprehensive National Anti-Corruption Strategy. Namibia signed UNCAC on the 09 December 2003 and ratified it on the 03 August 2004.

To determine the implementation progress, post the National Anti-Corruption Strategy and Action Plan 2016-2019 period, the NACS Secretariat at the Anti-Corruption Commission (ACC) carried out an evaluation exercise for the Strategy. NACS Steering Committee members validated the report, Cluster members, NACS actions implementing institutions and other stakeholders at a workshop held on the 14<sup>th</sup> to 16<sup>th</sup> October 2020.

The final National Anti-Corruption Strategy and Action Plan 2016-2019 Evaluation Report findings show that the NACS implementation was commendable. Of the total NACS, 75 actions, 70 actions representing 93 per cent, were implemented while 5 (7 %) were not implemented during the period of implementation reviewed. While out of the 70 NACS actions implemented, 15 (20 %) were completed, and recommendations thereof paved the way for developing the country's second National Anti-Corruption Strategy and Action Plan for 2021 2025.

Furthermore, the evaluation report provided several recommendations, such as implementing the proposed revision of the strategic objectives to ensure relevance and inclusion of emerging issues. Additionally, most of the 75 actions of the National Anti-Corruption Strategy and Action Plan 2016-2019 had also been recommended for inclusion in the second National Anti-Corruption Strategy.

The majority of the first Strategy's actions have been included in the second Strategy as revised by implementing institutions. All the Ministries have one or more actions. This Strategy further includes other 10

players and bodies of the private sector, sports and youth fraternities. Furthermore, it included specific actions for the media, civil society and faith-based organisations, regional councils, local authorities, and the youth.

Namibia is one of the countries scored by Transparency International's Corruption Perception Index (CPI) on the state of corruption. CPI scores countries on a scale of 0-100, with 0 indicating very high corruption and 100 indicating a very low level of corruption. Furthermore, it also ranks countries from 1 to the last country (depending on how many countries assessed in that particular year), with one being the least corrupt. In 2020, Namibia received a score of 51 out of 100 and was ranked 57 out of 180 countries on the Transparency International CPI for 2020 (seven data sources were used to allocate scores). This score and ranking reflect a drop in Namibia's 2019 score (52) and one place in the ranking (56). The 2020 score is far from NDP5 target, 58 in the 2019/2020 financial year. In addition, the country's desired outcome at the end of the NDP5 period is to be the most transparent and accountable nation in Africa. However, this can only be attained if all stakeholders join hands in the fight against corruption, as the country's score in 2020 is at number six (6) in Sub-Saharan Africa.

Not only is that. At home, despite robust efforts undertaken in the fight against corruption, corruption continues to plaque Namibia. Therefore, this second National Anti-Corruption Strategy and Action Plan 2021-2025 is premised on synergy. It aims to bring all stakeholders under one roof to promote effective governance by aligning the Strategy activities to their respective institution's Strategic Plans. Fighting corruption seeks good governance as the key to Namibia's economic growth and development, as indicated under the fourth pillar of NDP5. To achieve this, all sectors will be required to develop policies and programs that promote transparency and accountability. Transparency and accountability of government institutions align with achieving Outcome 4 of the UN Partnership Framework (UNPAF) 2019-2023.

The National Anti-Corruption Strategy and Action Plan 2021-2025 will outline NACS activities and action plan to be implemented over five years (2021-2025) and ensure that the NACS activities are embedded in

11

implementing institutions Strategic Plans. Furthermore, enforce NACS and Action Plan 2016-2019 evaluation report findings recommendations and contribute to the Sustainable Development Goals (SDG 16), target "16.5 substantially reduce corruption and bribery in all their forms". The ACC will implement the Strategy as the Strategy Steering Committee's coordinating agency, implementing partners, policymakers, external stakeholders, development partners, and the broader public.

Moreover, as recommended, most of the actions have been retained in this new Strategy, the National Anti-Corruption Strategy and Action Plan 2021-2025, as they are enshrined in the lead institutions' mandate, some were not fully implemented. The new Strategy revisited the strategic objectives to ensure that they respond to current and evolving national needs (integrity systems, good governance, and accountability) in the sectors initially enshrined in the Strategy and other sectors such as environment, agriculture, tourism, or as deemed relevant in this Strategy.

#### 1.4 Legal framework

The Republic of Namibia's Constitution establishes Namibia as a multiparty democracy functioning under the Rule of Law. The Constitution follows the principle of separation of powers between the Executive, the Legislature and the Judiciary.

Under section (2), the Namibian Constitution states that there shall be established by an Act of Parliament an Anti-Corruption Commission with its powers and functions provided for in such Act. A constitutional amendment in 2010 shifted corruption investigation power from the functions of the Ombudsman to the ACC. The ACC was established in 2006 in Section 2 of the Anti-Corruption Act, 2003, under the Constitution's ambit. The ACC thus became a constitutionally enshrined institution in 2010.

The Anti-Corruption Act is a crucial piece of legislation dealing with preventing and combating corruption in Namibia. Parliament passed the Act in 2003 following public consultations that had commenced in the mid-1990s. The Act entered into force in 2005, and the ACC was inaugurated on 01 February 2006. The

Prevention of Corruption Ordinance, 1928 (Ordinance No. 2 of 1928), as amended by the Prevention of Corruption Amendment Act, 1985 (No. 21 of 1985), was the forerunner to the current Anti-Corruption Act (Act No. 8 of 2003).

Accordingly, the development and roll-out of the National Anti-Corruption Strategy and Action Plan 2021-2025 have been founded on the commitment to all citizens' social progression. Therefore, the Strategy is aligned with the several national instruments and blueprints, including Vision 2030, second Harambee Prosperity Plan, NDP5 and different institutional strategic plans.

Vision 2030 is the Government's overarching long-term plan for the country, creating "a prosperous and industrialised Namibia developed by her human resources enjoying peace, harmony and political stability by 2030". Vision 2030 foresees that: "Corruption, tribalism, intolerance, racism and poverty on the part of officials and the citizenry, in general, will have virtually disappeared from Namibian society" by 2030.

The second Harambee Prosperity Plan calls for the full implementation of the National Anti-Corruption Strategy and Action Plan. Additionally, NDP5 themed "Working Together Towards Prosperity" is among other pillars premised on good governance seen as a bedrock of democracy and sustainable development. The NDP5 supports Vision 2030 and obligates the Government to continue its fights against corruption.

Below are three strategic documents, activities and expected outcomes that are linked to NACSAP:

Government Strategic Document	Document Linkages with NACS	Activities	Outcomes
Namibia Vision 2030	Section 3.9 Enabling Environment; Section 3.9.4 Good Governance, Transparency, Accountability	Independent watchdog institutions ensure the implementation of anti- corruption programmes and monitor activities of the Government, the private sector, and civil society organisations and agencies.	The Government operates in an effective, efficient, transparent and accountable manner at all levels under accepted constitutional principles.
	Section 6.7 Democratic Governance	Create an enabling environment against social/political conflict and corruption and for democratic participation	
Harambee Prosperity Plan	Effective Governance and Service Delivery	Implementation of the Anti- Corruption Strategy and Action Plan; Access to Public Information; E- Governance	Full implementation of the NACSAP
Namibia's 5 <sup>th</sup> National Development Plan (2017/18 – 2021/22)	Section 5.2 Accountability and Transparency	Strengthen anti-corruption measures by educating public and private entities on measures to prevent and report corruption. Institutions will devise Risk Management Plans that identify areas that are vulnerable to corruption and establish preventative measures.	By 2022, Namibia is the most transparent and accountable nation in Africa. -Reduced Corruption Perception Index from 65% (2015) to 35% (2020/21), 20% (2021/22) -Increased Transparency International index (score) from 53 (2015) to 60 (2020/21), 65 (2021/22)

Moreover, Namibia signed the United Nations Convention against Corruption (UNCAC) in 2003 and ratified the convention in 2004. The revision and development of the Strategy thereof are in line with Article 5 of the UNCAC, which requires State Parties to develop and implement a comprehensive national anti-corruption strategy.

Namibia is also a signatory to the African Union (AU) Convention on preventing and combating corruption, SADC protocol against corruption and the United Nations (UN) Convention against Transnational Organized Crime.

At an operational level, the following legislations are embedded in the Strategy:

#### Prevention of Organised Crime Act, 2003 (Act No. 29 of 2004)

The Act addressed the combating of organised crime, money laundering, racketeering, smuggling of migrants trafficking in persons and criminal gang activities in Namibia and elsewhere. The Act allows for the seizure of property used in offences and profits made, which is then transferred ti a Criminal Assets Recovery Fund and used to fund crime prevention activities.

#### Financial Intelligence Act, 2012 (Act No. 13 of 2012)

The main purpose of the Act is to combat money laundering by imposing a duty on accountable institutions to report certain transactions to the Bank of Namibia (BoN).

#### The Criminal Procedure Act, 2004 (Act No. 25 of 2004) as amended;

The constitutional powers and legitimacy of the Prosecutor-General are complemented by this Act, which gives the Prosecutor-General the prerogative to institute criminal proceedings with regard to offences that fall under the jurisdiction of the Namibian courts.

#### Banking Institutions Act, 1998 (Act No. 2 of 1998)

The Act contains provisions that provide for the detection and tracing of the proceeds of crime and helps to establish an audit trail in the event of criminal investigations.

#### Exchange Control Regulations, 1961 (GN R.1112 of 1961)

The Bank of Namibia has issued two exchange control circulars (No. BON 01/19 of 2 November 2001 and No. BON 02/ 08 March 2002) to authorised dealers in foreign exchange (commercial banks) under the power vested in the Bank under the Exchange Control Regulations, 1961.

Authorised dealers are required to report any foreign transaction involving identified persons and institutions to the Bank. The Bank has the power under regulation 4 of the said regulations to freeze accounts of residents transferring funds to the identified persons and institutions, The Minister of Finance, in turn, has the power to forfeit such monies to the State.

#### The Public Service Act, 1995 (Act No.13 of 1995)

The Act established the public service and also regulates the employment, conditions of service, appointments, misconduct, discipline and discharge of public servants. The Act also deals with the concept of conflict of interest. A staff member can be charged with misconduct if he or she undertakes private work related to the field of operation of the office, ministry or agency in which he or she is employed without the necessary approval. Additionally, a staff member is open to disciplinary action if he or she fails to declare that a member of his or her household operates or undertakes such private work. The Act also prohibits the misappropriation or improper use of any property of the state. In addition, the Act prohibits public servants from using their position or state property to promote or prejudice the interest of any political party.

The regulations promulgated under the Public Service Act, 1995 were amended during the 2015/16 financial year to further regulate the conduct of staff members.

Moreover, Government has also amended the Public Service Staff Rules (PSSR) to extend the definition of "major offences" to include corrupt practices as stipulated on contemplated in Chapter 4 of the Anti-Corruption Act, 2003". The PSSR was finalised by the Public Service Commission and became operational in 2019. The inclusion of corrupt practices in the Public Service Staff Rules will cover the disciplinary mechanism for public service employees.

#### Namibia Financial Institutions Supervisory Authority Act, 2001 (Act No.3 of 2001)

The Act makes provision for the establishment of the Namibia Financial Institutions Supervisory Authority (NAMFISA) to exercise supervision over the business of non-banking financial institutions and services.

#### Companies Act, 2004 (Act. No 28 of 2004)

The Act regulates the establishment and operations of companies, including the judicial management and liquidation of companies. The Act obligates a director of a company to disclose a direct or indirect interest in a proposed contract entered into by the company or a contract already into by the company. Failure to do so constitutes a criminal offence. The same is true for officers of the company who have authorised to enter into a contract on behalf of the company. The Act also deals with the offence of inside trading, which is the practise of dealing in the securities of a company with the intent of profiting on the strength of information not yet disclosed to shareholders.

#### Electoral Act, 2014 (Act No. 5 of 2014)

Chapter 4 of the Act makes provision for increased transparency and accountability in political party financing and addresses vote buying in Section 181. The Act regulates foreign, domestic and public funding of political parties, prescribes audits of political party finances and highlights sanctions of non-compliance.

#### The Procurement Act, 2015 (Act No. 15 of 2015) as amended

The Act, which replaced the Tender Board of Namibia Act, 1996 (Act No. 16 of 1996), makes provision for the procurement of goods and services in the public institutions. Section 66 (3) of the Public Procurement Act, 2015 stipulate that a staff member of the public entity who acts or abets corruptly or fraudulently to gain favour or benefit, including soliciting or accepting improper inducement commits an offence and is liable to a fine not exceeding N\$100 000 or to imprisonment for a period not exceeding ten years. In the same vein, Section 67 also outlines the act of corruption on the part of the bidders, which constitutes criminal activities.

In addition, the Act makes provision for the creation of the Central Procurement Board of Namibia, and charged with the responsibility to conduct the bidding process on behalf of public entities for the award of contracts for procurement or disposal of assets that exceed the threshold prescribed for public entities amongst other functions.

# Section 2: Strategic Objectives & Actions

#### 2. Strategic Objectives

#### 2.1 Strategy Framework

The Strategy is premised on the social and economic climate of the country. Namibia's fight against corruption and promotion of integrity, accountability focuses on five strategic pillars: prevention, public education, law enforcement, deterrence and harmonisation. The mechanisms mentioned above are anticipated to promote integrity, transparency, accountability, ensure compliance, and foster synergy across sectors and effective governance. Likewise, this Strategy gives high priority to the key issues prioritised in high-level documents.

2.1.1 Vision and mission of National Anti-Corruption Strategy

#### Vision

A corrupt free Namibia

#### Mission

To develop, establish, maintain an effective system of integrity, transparency, ethics and accountability in all sectors of society in Namibia

#### Strategic Objectives

The Strategy has eight Strategic Objectives. The objectives include various sectors at the institutional and grassroots level(s) in private and public bodies. Accordingly, the strategic objectives respond to key issues and country challenges within this context. The strategic objectives were crafted through desk research, consultations with stakeholders, including institutions, civil society, youth, and stakeholders in all 14 regions and key informant input.

#### The following strategic objectives inform the actions:

- 1. Strategic Objective 1: Increasing the level of political accountability and transparency
- 2. **Strategic Objective 2:** Preventing corruption in government offices, ministries and agencies, Public Enterprises, Regional Councils and Local Authorities
- 3. Strategic Objective 3: Strengthening efforts to deter corruption
- 4. Strategic Objective 4: Conducting extensive anti-corruption education

- 5. **Strategic Objective 5:** Enhance measures and increase accountability to prevent corruption in the private sector
- 6. Strategic Objective 6: Engaging civil society and the media in combating corruption
- 7. Strategic Objective 7: Preventing corruption and promoting accountability in the sports fraternity
- 8. Strategic Objective 8: Engagement and participation of youth in anti-corruption initiatives

#### Strategic Objective 1: Increasing the level of political accountability and transparency

It is imperative that political parties be held to high standards of accountability. It is the elected political parties that form the government of the day. Political parties ought to be held demonstrate an exemplary standard of accountability. Political accountability is instrumental in upholding democracy and transparency.

Chapter 4 of the Electoral Act, 2014 makes provision for the comprehensive regulation of the political party financing and accountability by political parties. These includes a provision for the annual declaration by political parties of their assets and liabilities to the Electoral Commission of Namibia (ECN), which should include the sources of funds (Section 139). Such declarations are open for inspection by the public. Furthermore, Section 140 of the Act requires the keeping of an accurate and permanently maintained record of any contribution, sources of funds and assets as well as audited financial statements, while Section 181 prohibits the buying of votes by political parties.

To this effect, there is a need for continued enforcement from all bodies such as the Electoral Commission of Namibia, Ministry of Finance and the National Assembly as well as robust engagement, awareness and education on the provisions.

#### Specific objective 1.1: Increasing the transparency of political party financing

Action 1.1.1	Annual reviews on whether provision of party transparency as contained in
	Chapter 4 of the Electoral Act, 2014 have been complied with. Annual reports
	thereon will be published and submitted to Parliament. Each report will investigate
	any reasons for non-compliance and will offer solutions.
Responsibility:	ECN, Parliament, MoF
Action 1.1.2	Strengthening cooperation between ECN, Parliament and MoF with regard to political parties funding
Responsibility:	ECN, Parliament, MoF

Action 1.1.3Compile and submit the Post-elections report within the prescribed period in terms<br/>of section 116 of the Electoral Act.

Responsibility: ECN

#### Strategic Objective 2: Preventing corruption in government offices, ministries and agencies,

#### public enterprises, regional councils and local authorities

An important building block of the Government of Namibia's second National Anti-Corruption Strategy and Action Plan consists of reforms in the internal management of public resources and administration to reduce opportunities and incentives for corruption, while minimising wastages in public institutions. The prevention of corruption in, regional councils, local authorities, government offices, ministries and agencies and in public enterprises remain crucial in the Strategy.

Moreover, the actions under this Strategic Objective focus on reforms in the public sector and the administration's internal management to reduce opportunities and incentives for corruption while seeking to improve service delivery and promote integrity.

#### Specific Objective 2.1: Addressing public institutions' specific vulnerabilities by systematic implementation of preventative measures

Action 2.1.1 Periodic review of the public sector systems to ensure that they uphold the principles of good governance. OPM

**Responsibility:** 

Action 2.1.2 Revision and harmonisation of the public sector systems and legislation inclusive of RC& LAs to ensure that they uphold the principles of good governance.

> NB: Ministry of Urban and Rural Development, ALAN, ARC, NALAO and Office of the Prime Minister were given the task to look at the two governing regulations that RC and LAs use. These are the Public Service Act and Regional Councils Act, as well as the Local Authorities Act. The institutions, as mentioned earlier, were to find the best way to incorporate the declaration of Interest and Assets in the RCs and LAs Act.

Responsibility: MURD, RCs, LAs, OPM. 
 Action 2.1.3
 Develop a national framework for conducting corruption risk management in public and private bodies

Responsibility: ACC

- Action 2.1.4Develop a national framework for conducting practices, procedures and system<br/>examination in public and private bodies and build capacity thereof.
- **Responsibility:** ACC, MoPE and MURD, ALAN, ARC
- Action 2.1.5 Implement Corruption Risk Assessment and other system examination of procedures on corruption vulnerabilities in O/M/As, RCs, LAs, private bodies and provide recommendations for risk mitigation and organisational transformation.
   Responsibility: ACC, MoPE and MURD, ALAN, ARC
- Action 2.1.6
   Strengthen policies and procedures in dealing with the collection of money and other related finances when dealing with National Documents.

   Responsibility:
   MoHAISS
- Action 2.1.7
   Strengthen policies and capacity building of staffs to reduce loopholes that are caused by middle man in the issuing of National Documents

   Responsibility:
   MoHAISS
- Action 2.1.8 Develop and implement anti-corruption mechanisms to close loopholes for corruption in the force
- Responsibility: MoHAISS- NAMPOL
- Action 2.1.9 Develop and implement anti-corruption mechanisms to close loopholes for corruption in works and transport sector

# Responsibility: MWT, NATIS Action 2.10 Develop and implement anti-corruption mechanism to close the loopholes for corruption in the public sector Responsibility: OMAs/ RCs/ LAs

Specific Objective 2.2: Enhancing accountability, transparency and integrity specifically in public institutions

Action 2.2.1 Ensure implementation and roll-out of the integrity committees in OMAs, RCs, and LAs charged with overseeing the implementation of integrity systems and plans complying with provisions thereof and compiling annual ethics and transparency reports.

**Responsibility:** OPM, OMAs, RCs and LAs, PEs, MoPE

Action 2.2.2 Oversee the signing of the one-page integrity pledge to uphold and guide ethical conduct, including integrity, honesty, objectivity and impartiality

**Responsibility:** OPM, Integrity Committees of All OMAs, MoPE, RCs, LAs

 Action 2.2.3
 Ensure transparency and compliance in the allocation and distribution of agricultural, veterinary and water sector initiatives

 Responsibility:
 MAWLR

Action 2.2.4 Develop proper mechanisms for the transparent and equitable allocation of land

**Responsibility:** MAWLR, Traditional Authorities, Local Authorities

Action 2.2.5	Ensure protection of natural resources and environment through specific anti-corruption and transparency policies and procedures
Responsibility:	MEFT, ACC
Action 2.2.6	Promote systems of integrity through specific anti-corruption and transparency policies and procedures in higher education
Responsibility:	MHETI
Action 2.2.7	Promote systems of integrity through specific anti-corruption and transparency policies and procedures in formal education system administration
Responsibility:	MoEAC
Action 2.2.8	Promote systems of integrity through specific anti-corruption and transparency policies, procedures including official permits and national documents
Responsibility:	MoHAISS
Action 2.2.9	Promote systems of integrity through specific anti-corruption and transparency policies and procedures in the health sector
Responsibility:	MoHSS
Specific Objective 2.3:	Enhancing transparency and integrity specifically in Public Enterprises
Action 2.3.1	Standardise regulations and policies for PEs
Responsibility:	MoPE
Action 2.3.2	Reports and data on the conduct and performance of all PEs are made available publicly per the relevant law. Standardise regulations and policies for PEs

# Responsibility: MoPE Action 2.3.3 Facilitate corruption awareness and ethics training for PEs staff members in collaboration with anti-corruption bodies

Responsibility: MOPE, ACC

### Specific Objective 2.4: Strengthening the integrity and transparency of the Judiciary Action 2.4.1 An analysis of all judicial reform initiatives introduced to streamline the efficiency of the judiciary management systems in Namibia **Responsibility:** Office of the Judiciary Action 2.4.2 Adequate resources availed to the Judiciary to ensure that the courts have sufficient and well-trained staff (all judicial officers and court support staff). **Responsibility:** Office of the Judiciary Action 2.4.1 Necessary infrastructural resources and facilities sufficient and necessary for the effective and efficient operation of the courts availed **Responsibility:** MoJ Specific Objective 2.5: Strengthening the integrity and transparency of Parliament Action 2.5.1 Resources availed to Parliament within the means of the state to ensure that Parliament can carry out its oversight role effectively **Responsibility:** Parliament, MoF

Action 2.5.2	Parliament will annually publish a report on compliance with their specific rules on asset disclosure.
	<b>NB</b> : Amend, reform and strengthen the Code of Conduct and Rules of the Parliament that are clear as well as specify and provide for the actions in line with the Constitution Article 59 (2) and Code of Conduct chapter 5 to provide for actions and measures that need to be taken in the event of non-compliance. The regulations should also provide for the protection of the members of Parliament in terms of privacy, human rights and what should be done with the information provided. It is also recommended that information provided to be subjected to further audits. The Office of the Auditor-General should be tasked with the responsibility to audit information declared annually and produce a report.
Responsibility:	Parliament, OAG
Action 2.5.3	Training courses on the various legislation will be offered to MPs and staff annually
Responsibility:	Parliament
Action 2.5.4	Periodical public seminars consultations, and public debates will be facilitated to disseminate best practices on integrity amongst MPs and discuss topical issues related to integrity and corruption annually
Responsibility:	Parliament, ACC
Action 2.5.5	Strengthening of parliamentary and public oversight through and follow up action on findings. Parliament should develop punitive measures to take Accounting Officers to task.
Responsibility:	Parliament
Specific Objective 2.6:	Support to public procurement system reform
Action 2.6.1	(MoF) PPU to continue conducting public awareness activities on public procurement as per the public Education Strategy year after year.
Responsibility:	MoF/ PPU

Action 2.6.2	Training courses in public procurement for public entities (including internal auditors), the Office of the Auditor-General and private audit firms
Responsibility:	MoF/ PPU
Action 2.6.3	Capacity development of the PPU staff will continue to take through unaccredited short courses, professional courses and internal capacity development
Responsibility:	MoF/ PPU
Action 2.6.4	Development of unaccredited and accredited anti-corruption training courses and delivery thereof, by institutions of higher learning.
Responsibility:	PPU, UNAM, NUST, NIPAM, ACC and other tertiary institutions
Action 2.6.5	In order to ensure transparency in the procurement system, information on procurement plans, procurement implementation reports, and contract awards will readily be made publicly accessible
Responsibility:	MoF, PPU, All public institutions

### Specific Objective 2.7: Enhancing transparency and accountability in budget management

Action 2.7.1	Reduce diversion of resources into non-budgetary accounts
Responsibility:	MoF, All public institutions
Action 2.7.2	Reduce diversion of resources into non-budgetary accounts
Responsibility:	MoF, All public institutions
Action 2.6.3	Regular training on budget design and management with MPs and specifically Members
	of the Parliamentary Standing Committee on Public Accounts to strengthen the oversight
	function in this regard

Responsibility:	Parliament, OAG, MoF
Action 2.7.3	Complementing internal audits with independent external audits
Responsibility:	OAG
Action 2.7.3	Enhance budget transparency by strengthening the auditing of public institutions and ensuring that audit reports are produced on time
Responsibility:	OAG
Action 2.7.4	Enhance budget transparency: In year reports to improve the amount of accessible information available on the budget.
Responsibility:	OAG
Action 2.7.5	Ensure RCs and LAs capacity in financial management and auditing.
Responsibility:	OAG
Action 2.7.6	Strengthen compliance on OMAs to oversee all ITC procurements and ensure that such procurement is only done in consultation and certification by OPM. OPM to conduct more awareness to OMAs and collaborate with MoF for payments only to be made after certification by OPM. OPM should also develop a tool that will
	strengthen compliance.
Responsibility:	OPM

## Specific objective 2.8: Prevent corruption and promote transparency in the extractive industries, fishing and other living marine resources

The proper utilisation and management of natural resources have great potential to contribute to Namibia's long-term growth prospects and sustainable development. Accordingly, transparency, accountability and effective governance are crucial for Namibia to derive benefits from the extractive industry, fisheries and other living marine resources. Therefore, effective regulatory frameworks and anti-corruption efforts should be put in place before and post the extraction of natural resources.

Action 2.8.1:	Assess and align current legislation and subordinate legislation with international fishing and other living marine resources industry standards
Responsibility:	MFMR
Action 2.8.2:	Assess and align current legislation and subordinate legislation with international extractive industry standards.
Responsibility:	MME
Action 2.8.3:	Develop proper mechanisms for the transparent and equitable allocation of fishing and other living marine resources rights and or quotas
Responsibility:	MFMR
Action 2.8.4:	Improve on the implementation of current policy and regulatory framework in tangent with the UN Food and Agriculture Organization (FAO) Code of Conduct on Responsible Fishing Practices
Responsibility:	MFMR
Action 2.8.5:	Provide public education on the fishing and other living marine resources industries
Responsibility:	MFMR
Action 2.8.6:	Fishing and other living marine resources industries to adopt and implement specific anti- corruption and transparency policies and procedures
Responsibility:	MFMR
Action 2.8.7:	MFMR to establish a committee to deal with grievances and dispute resolutions for the fishing industry
Responsibility:	MFMR
Action 2.8.9:	Monitor national grievance and dispute resolution mechanisms w.r.t the extractive industry.

MME
Ensure transparency compliance with international extractive industry standards set by EITI by training the relevant officials and by amending existing or incorporating additional regulatory measures. MME to oversee compliance with IAEA and KPC, as Namibia is a producer and trader of uranium and diamonds.
MME
Provide public education on the extractive industry
MME

#### Strategic Objective 3- Strengthening efforts to deter corruption

While a well-functioning, competent and clean judiciary is key in upholding the rule of law, anti-corruption laws are an effective means of the anti-corruption strategy. Anti-corruption laws and strengthening the capacity of ACC are deemed effective means of the anti-corruption Strategy. Namibia believes that a competent, transparent and well-functioning judiciary is the backbone of good governance and the key to the rule of law in the country. Therefore, Anti-Corruption law enacted to deter corrupt actions, prosecute corruptors and revitalise justice in the country.

#### Specific Objective 3.1 Strengthening the Anti-Corruption Commission

Action 3.1.1	Recruit and retain competent ACC staff
Responsibility:	ACC, OPM
Action 3.1.2	Strengthen ACC's financial capacity to enable it to carry out its mandate effectively
Responsibility:	Parliament, ACC, MOF
Action 3.1.3	Strengthen the capacity of ACC investigators and prosecutors through extensive joint training
Responsibility:	ACC, Office of the Prosecutor General
Action 3.1.4	Monitor delays in corruption cases, the reasons for the delays and recommendations to eliminate unnecessary delays
Responsibility:	OoJ, ACC, Office of the Prosecutor-General
Action 3.1.5	Develop and enact an Audit Bill to ensure Auditor General Reports are followed by rectified accounts.
Responsibility:	OAG, relevant committees of Parliament.

#### Specific Objective 3.2: Strengthening anti-corruption legislation

Action 3.2.1	Amend the Anti-Corruption Act, 2003 to include the solicitation for or acceptance of a bribe by a foreign public official or an official of an international public organisation as a criminal offence
	<ul> <li>Amend the Anti-Corruption Act, 2003 to include embezzlement by a person in the private sector as a corrupt practice</li> </ul>
Responsibility:	ACC, MOJ, Office of the Attorney General
Action 3.2.2	Combat illicit enrichment inclusive of enabling tax authorities to conduct lifestyle audits
Responsibility:	MoF
Action 3.2.3	Amend the Criminal Procedure Act, 1977 to include the corrupt practices referred to section 1 of the Anti-Corruption Act, 2003 in the list of offences provided for in Schedule 1 and Part IV of Schedule 2 to the Act
Responsibility:	MoJ, ACC
Action 3.2.4	Amend the Prevention of Organised Crime Act, 2004 (POCA) to align it with the Anti- Corruption Act, 2003. In particular, the definitions of "authorised member of police" and "member of the police" should be extended to include authorised officers of ACC, to enable such officers to enforce POCA
Responsibility:	MOJ, ACC
Action 3.2.5	Implement and monitor both Whistleblower Protection Act, 10 of 2017 and Witness Protection Act, 11 of 2017
Responsibility:	MOJ
Specific Objective 3	3: Addressing public institutions' specific vulnerabilities
Action 3.3.1	Monitor the register of business entities and individuals who are barred from undertaking government-related work due to previous irregularities and dishonesty or corruption convictions
Responsibility:	MOF
Action 3.3.2:	Implement, enforce and report to OPM on the provision of the Public Service Staff Rules amended to extend the definition of "major offences" to include corrupt practices as contemplated in Chapter 4 of the Anti-Corruption Act, 2003
<b>Responsibility</b> :	OPM, all OMAs, ACC

Action 3.3.3 Review progress made on preventing the laundering of the proceeds of crime

Responsibility: FIC, Office of the Prosecutor General & NAMPOL

#### Strategic Objective 4-Conducting extensive anti-corruption education

A corruption free society needs to be an informed society. Therefore, all people including public servants and private employees' participation in periodic training or awareness programmes on corruption, ethics and integrity is crucial in fighting corruption through behavioural change. For this reason, it is crucial to promote and organise anti-corruption public debates at national, regional, and local levels.

A nation-wide civic education strategy on corruption will thus be designed and implemented through the following actions:

## Specific Objective 4.1: Conduct anti-corruption, ethics and integrity training for personnel of public institutions

Action 4.1.1	Ensure participation of public servants at periodical training courses on ethical issues and integrity for staff of O/M/As, RCs and LAs.
Responsibility:	ACC, OPM, NIPAM, OMAs, ALAN, ARC and NALAO
Action 4.1.2	Training and counselling on compliance and conflict of interest
Responsibility:	OPM Division: Integrity Unit
Action 4.1.3:	Implement a training programme on ethics, integrity and anti-corruption for school teachers
Responsibility:	MoEAC, ACC

Specific Objective 4.2: Increasing the degree of public awareness on the impact of corruption

Action 4.2.1	Organising periodical consultations and public debates for promoting the best anti- corruption practices within local and regional authorities and increasing citizens' confidence
Responsibility:	ACC, NALAO, ARC
Action 4.2.2	Organise awareness sessions on corruption and ethics for the public to enhance general knowledge and understanding
Responsibility:	ACC
Action 4.2.3	Monitor delivery of the anti-corruption theme in the civic life skills subject in schools
Responsibility:	MoEAC (NIED), ACC

Action 4.2.4 Implementing civic education programmes for promoting ethics, integrity, openness and access to and protection of information through relevant educational media and the establishment of regional access centres

Responsibility: MICT

### Strategic Objective 5-Preventing corruption in the private sector

Weak institutions for corporate governance not only result in inefficiency, they encourage corruption. Poorly governed managers may use their positions to extract favours from the state which they can later expropriate, rather than reinvest into restructuring their own firms, to avoid sharing their gains with the other stakeholders. Business associations are a means of engaging in collective action, providing a more powerful unified voice and protecting the single firm from potential backlashes or competitive disadvantage while pursuing ethical business practices. Business associations can serve as a legitimate instruments to represent interest in the formulation of law and policy.

Moreover, the Namibian Companies Act, Act 28 of 2004 ("the Act") contains several provisions that will directly impact all companies, directors and officers. The Act was amended to remove gender bias and include Namibian legislation like the Anti-Corruption Act of 2003 to standardise company secretarial documents to the official language and update penalties and fees applicable. Based on the above statement, this Strategic Objective seeks to foster cooperation with private companies to prevent and deter corruption.

<b>Specific Objective 5</b>	.1: 8	Supporting tra	insparency	and integrity	in private enterprise

Action 5.1.1	Assist enterprises in the private sector in developing internal integrity systems compliance procedures and ethics codes. Further, integrate anti-corruption awareness
Responsibility:	NCCI, NCF, NTF, NIC, SME Compete
Action 5.1.2:	Conduct assessment to ascertain ways to simplify bureaucratic procedures for service to private enterprises
Responsibility:	BIPA
Action 5.1.3:	Undertake robust civic education on company registration, integrity and business conduct
	in Namibia to allow aspiring entrepreneurs to make an informed decision.
Responsibility:	BIPA

Action 5.1.4 Ensuring that private enterprises, taking into account their structure and size, have sufficient internal auditing controls to help prevent and detect acts of corruption and that the accounts and required financial statements of such private enterprises are subject to appropriate auditing and certification procedures.

**Responsibility:** BIPA, MoF

Action 5.1.5 Promoting transparency among private entities, including where appropriate, measures regarding the identity of legal and natural persons involved in the established and management of corporate entities

Responsibility: BIPA, MoF

- Action 5.1.5: Extractive industry bodies to adopt and implement specific anti-corruption and transparency policies and procedures
- Responsibility: MME, Chambers of Mines, Diamond Commissioner

### Strategic Objective 6- Engaging Civil Society & the Media in Combating Corruption

As stakeholders in good governance and as institutions mediating between the state and the public the Government of the Republic of Namibia recognises that organisations that comprise civil society citizen groups, non-governmental organisations, trade unions, business associations, think tanks, academia, religious organisations and the media can have an important role to play in constraining corruption. Independent Civil Society Organisations (CSOs) and the media, as independent actors representing the interests of the general public, are uniquely positioned to assist the Government to bring to light cases of corruption.

### Specific Objective 6.1: Supporting transparency in civil society

Action 6.1.1:	Organising	anti-corruption	public	dialogue,	ethics	training	and	corruption

- Responsibility: NID, IPPR, Civic+264, CCN, NUNW, MSYNS
- Action 6.1.2: Continuously engage relevant CSOs to assist in research on anti-corruption issues

Responsibility: ACC, NID, IPPR, Civic+264, NGOs

- Action 6.1.3: Review existing legal and regulatory environment for civic organisations to provide a parallel complementary voluntary registration system for CSOs and simplify the formal registration of CSOs as provided for in the Civic Organisations Partnership Policy of 2005. This process needs to speed up NPC to bring all the CSOs on board for the Civic Organizations Partnership Policy of 2005 to be realised.
- **Responsibility:** NPC, civil society, NGOs, faith-based organisations

Action 6.1.4: Encourage transparency initiatives through the development and implementation of comprehensive CSOs codes of conduct on ethics.

**Responsibility:** BIPA, NaCC, MoHSS

Action 6.1.5 Stronger collaboration with the academic community on corruption issues (research and programmes)

**Responsibility:** UNAM, NUST, IUM, ACC and other tertiary institutions

# Specific Objective 6.2: Supporting the role of the media

Action 6.2.1:	Continue to build and maintain an enabling environment for free media in line with
	the Namibian Constitution
Responsibility:	MICT, NEF
Action 6.2.2:	Develop and conduct more public education seminars on corruption for media
	houses and enhance partnership with media houses in the fight against corruption
Responsibility:	MICT, NEF, ACC
Action 6.2.3	Ensure ongoing training of investigative journalists on anti-corruption related issues as a
	priority
Responsibility:	MICT, NEF, ACC
Action 6.2.4	Encourage the media to design and implement internal media codes of conduct on ethics, anti-corruption and transparency, as well as self-regulation in reporting on corruption issues
Responsibility:	Media Ombudsman, NEF
Action 6.2.5	The Media Ombudsman to create awareness and popularise the office of the media ombudsman and the 'Self-Regulatory Code of Ethics and Conduct for Namibian Print, Broadcast and Online Media'. Also, sensitising the public about the fact it does not cover freelance and citizen journalism.
Responsibility:	Media Ombudsman, NEF

# Strategic Objective 7: Preventing corruption and promoting accountability in the sports fraternity

Misappropriation of funds meant for the smooth running of the Sport bodies in the Country, alleged inconsistence in the reward system to motivate athletes and infightings among sport administrators are some of the factors that impacted negatively within the country' sport fraternity.

Amendments to the law governing the sport administration need to be drafted to provide for the proper accounting of sport related funds, motivate, protect and appreciate athletes for their contributions towards sport.

An important object of the NACS in Namibia is the creation of an atmosphere in which corruption is rooted out in all spheres of sport administration for the purpose of encouraging and recognition of talents in the Country as per the actions below:

## Specific Objective 7.1: Supporting transparency and integrity in sports

Action 7.1.1: Sports oversight bodies to adopt and implement specific anti-corruption and transparency policies and procedures in all sporting codes

Responsibility: NSC, MSYNS

Action 7.1.2: Promote systems of integrity through corruption awareness and ethics training for sports clubs, administration staff members in collaboration with anti-corruption affiliates

Responsibility: NSC, MSYNS

# Strategic Objective 8: Engagement and participation of youth in anti-corruption programmes

Youth are the backbone of any nation, and Namibia is no exception. It is therefore crucial that youth are extensively engaged and participate in anti-corruption programmes. Such participation is imminent in enforcing ethos and continuity of moral fibre across generations. On the other hand, where there is decay in ethos and diminishing integrity, youth have the capacity to break the chain of corruption, and in the long run translate to better a crop of better leadership and broadly national development.

Specific Objective 8.1: Enhance the understanding of youth about corruption, ethics and integrity

Action 8.1.1:	Develop and implement a training programme on ethics, integrity and anti-corruption for youth leadership in all 14 regions
Responsibility:	MSYNS, ACC, MoEAC, NYC, NANSO, political parties youth wings
Action 8.1.2:	Promote dialogue on corruption, good governance, ethics and integrity for youth
Responsibility:	MSYNS, ACC, MoEAC, NYC, NANSO, political parties youth wings
Action 8.1.3:	Build capacity of the youth bodies and affiliates on anti-corruption, ethics and Integrity training
Responsibility:	ACC, MSYNS, NYC, NANSO, political parties youth wings

# Section3:StructureandImplementation Plan

# 3. Strategy Structure and Action Plan

# 3.1 Strategy Structure and Monitoring

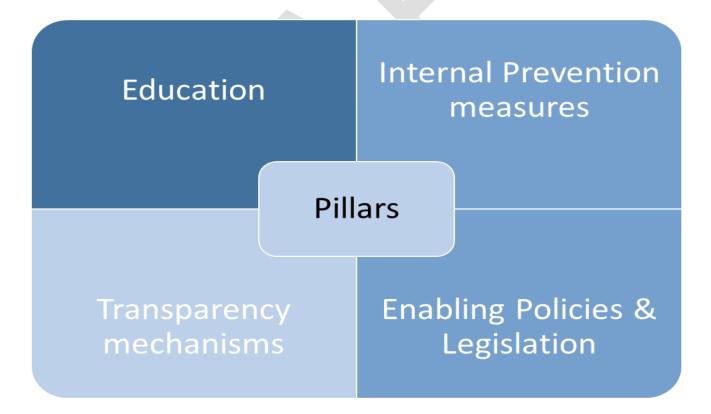
A National Steering Committee will monitor the overall implementation of the Strategy. The Strategy structure is one of the best practices derived from the previous Strategy. Accordingly, as with the other components, the structure is also informed by the following strategic objectives:

- Strategic Objective 1: Increasing the level of political accountability and transparency
- **Strategic Objective 2:** Preventing corruption in government offices, ministries and agencies, Public Enterprises, Regional Councils and Local Authorities
- Strategic Objective 3: Strengthening efforts to deter corruption
- Strategic Objective 4: Conducting extensive anti-corruption education
- Strategic Objective 5: Enhance measures and increase accountability to prevent corruption in the private sector
- Strategic Objective 6: Engaging civil society and the media in combating corruption
- Strategic Objective 7: Preventing corruption and promoting accountability in the sports fraternity
- Strategic Objective 8: Engagement and participation of youth in anti-corruption programmes

For this Strategy, the Clusters and Steering Committee structures were retained as a best practice since they were instrumental in fostering cooperation and would serve as platforms to account for actions and exchange ideas. However, what is different is that the Strategy has considered political office bearers (i.e. ministers or deputy ministers) and board members to be members of the Steering Committee. This is imperative to strengthen the monitoring of the NACS implementation process. Furthermore, NACSC Clusters are retained, with the membership being strictly Accounting Officers (Executive Directors) and Chief Executive Officers (CEOs). An additional monitoring structure in the form of the Strategy Regional Forums chaired by the Governors in all the 14 regions has also been included to ensure inclusivity, ownership and accountability at all levels of society.

The Strategy Steering Committee will be nominated at the induction. The Steering committee efforts will be supported by four Clusters, with each Cluster overseeing the implementation of actions under one or more Strategy objectives. This is imperative in order to strengthen the monitoring of the NACS implementation process. Furthermore, NACSC Clusters are retained, with the membership being strictly Accounting Officers (Executive Directors) and Chief Executive Officers (CEOs).

Activity grouping analysis such as Policies, Prevention, Mechanism and Education will explain the reason for having four clusters.



Activities in the Strategy Action Plan are designed under Clusters as follows:

- Strategic Objective 1: Increasing the level of political accountability and transparency
- **Strategic Objective 2:** Preventing corruption in government offices, ministries and agencies, Public Enterprises, Regional Councils and Local Authorities
- Strategic Objective 3: Strengthening efforts to deter corruption
- Strategic Objective 4: Conducting extensive anti-corruption education
- Strategic Objective 5: Enhance measures and increase accountability to prevent corruption in the private sector
- Strategic Objective 6: Engaging civil society and the media in combating corruption
- Strategic Objective 7: Preventing corruption and promoting accountability in the sports fraternity
- Strategic Objective 8: Engagement and participation of youth in anti-corruption programmes

Cluster(s)	Strategic Objective (s)
Cluster 1:	<ul> <li>Strategic Objective 1: Increasing the level of political accountability and transparency</li> <li>Strategic Objective 3: Strengthening efforts to deter corruption</li> </ul>
Cluster 2:	<b>Strategic Objective 2</b> : Preventing corruption in government offices, ministries and agencies / Regional Councils (RCs) and Local Authorities (LAs).
Cluster 3:	<b>Strategic Objective 4:</b> Conducting extensive anti- corruption education
	<b>Strategic Objective 6:</b> Engaging civil society and the media in combating corruption
	<b>Strategic Objective 8:</b> Engagement and participation of youth in anti-corruption programmes
Cluster 4:	Strategic Objective 5: Enhance measures and increase accountability to prevent corruption in the private sector
	<b>Strategic Objective 7:</b> Preventing corruption and promoting accountability in the sports fraternity

# 3.2 Monitoring and reporting:

# **Parliamentary Committee**

- Serves as the overall oversight body of the Strategy implementation to ensure accountability at national level, drive change and foster collaboration.
- ACC, the Strategy coordinating institution to serve as Secretariat to the Forum.

# National NASCAP Steering Committee:

- Responsible for monitoring and setting direction for the Strategy, provide leadership,
- Headed by Chairperson and supported by the Vice-chairperson
- Members are mainly: Ministers, deputy ministers (political office bearers)
- ACC to serve as the Secretariat

# **Clusters:**

- Serves as a platform for tracking progress
- Implementing institutions' accounting officers, accompanying technical staff members
- Meeting quarterly
- ACC to serve as the Secretariat

# **Strategy Regional Forums**

- Operational at regional level: Governors serve as the Chairpersons
- Platform for sharing information and stakeholders engagement, meeting twice a year
- Regional bodies to identify a vice chairperson
- Members are implementing institutions, CEOs and technical staff members

ACC Regional staff members will serve as Secretariat. As indicated above, the Secretariat will assist the Strategy Steering Committee and all other legs of the structure in coordinating and monitoring the progress in executing actions under the Strategy.

Moreover, the Secretariat will develop a monitoring and evaluation plan for the Strategy. The plan would complement the existing monitoring and reporting process to ensure efficiency, effectiveness and account for actions and implementation. Overall, to develop a tool for improved strategy execution.

Moreover, Key Performance Indicators (KPIs) and targets are more precise and SMART (Specific, Measurable, Achievable, Realistic and Timely), and this would come from the vital implementing institutions.

Complementary, with support from implementing institutions and the Secretariat, the Steering Committee will undertake robust communication through the media to inform the public on the Strategy's success. Awareness and communicating the progress made throughout the Strategy implementation period is hoped to influence perceptions, encourage participation by stakeholders at all levels, change in behaviours, attitudes, practices and policies.

# 3.2 Action Plan (KPI template)

	Implementing institution	Action	Output	KPI	KPI Definition	КРІ Туре	Baseline			Planned Action Steps		
Objective								Q1	Q2	Q3	Q4	oteps