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EVALUATION REPORT OF THE NATIONAL ANTI-CORRUPTION STRATEGY & ACTION PLAN (2016-2019)

**PREPARED BY ANTI-CORRUPTION COMMISSION (ACC)
DIRECTORATE OF PUBLIC EDUCATION AND CORRUPTION PREVENTION- OCTOBER 2020**

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This report was prepared by the NACS Secretariat, who are staff members in the Directorate Public Education and Corruption Prevention at the Anti-Corruption Commission. The evaluation team expresses gratitude to all implementing institutions and individuals for critique and valuable input provided during the conduct of this evaluation.

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CONTENTS

Acknowledgement	2
List of Abbreviations	4
Executive Summary	6
1. INTRODUCTION AND BACKGROUND	10
1.1 Background	10
1.2 Purpose and objectives	11
1.3 Evaluation Scope	11
2. METHODOLOGY	13
2.1 Data Collection and Analysis	13
2.1.1 Document review and analysis	13
2.1.2 Focused-group discussions	13
2.1.3 Limitations	14
3. FINDINGS AND PROGRESS MADE	15
3.1 General findings- How we did?	15
3.2 Progress made on Strategic Objectives and 75 NACS Actions	19
3.3 Findings of evaluation criteria	65
3.3.1 Relevance	65
3.3.2 Efficiency and Effectiveness	65
3.3.3 Impact or added value	67
3.3.4 Sustainability	67
3.3.5 Established partnerships and cooperation	68
4. RECOMMENDATIONS	70
5. LESSONS LEARNED	72
6. REFERENCES	74

LIST OF ABBREVIATIONS

ACC	Anti-Corruption Commission
AEIMS	Adults Education Information Management System
BIPA	Business and Intellectual Property Authority
CCL	Cabinet Committee on Legislation
CPA	Criminal Procedure Act
CRA	Corruption Risk Assessments
CSOPP	Civic Organizations Partnership Policy
CSOs	Civil Society Organizations
DPSM	Department of Public Service Management
ECN	Electoral Commission of Namibia
ELIMS	Electronic Labour Information Management System
ERP	Enterprise Resource Planning
FIC	Financial Intelligence Centre
IAEA	International Atomic Energy Agency
ICSP	Integrated Client Services Project
IGF	Inter-Governmental Forum on Mining, Minerals, Metals and Sustainable Development
IUM	International University of Management
MFMR	Ministry of Fisheries and Marine Resources
MICT	Ministry of Information and Communication Technology
MITSMED	Ministry of Industrialisation, Trade and SME Development
MLAC	Mineral Licence Advisory Committee
MME	Ministry of Mines and Energy
MOF	Ministry of Finance
MOJ	Ministry of Justice
MOPE	Ministry of Public Enterprises
MPs	Members of Parliament
MURD	Ministry of Urban and Rural Development
NACS	National Anti-Corruption Strategy and Action Plan 2016-2019
NACSC	National Anti-Corruption Steering Committee
NAMPOL	Namibian Police Force
NC	National Council
NCC	Namibia Competition Commission

NCCI	Namibia Chambers of Commerce and Industry
NDP5	Namibia's Fifth National Development Plan
NFSI	National Forensic Science Institute of Namibia
NIEIS	Namibia Integrated Employment Information System
NIPAM	Namibia Institute for Public Administration and Management
NSW	National Single Window
NUST	University of Science and Technology
OAG	Office of the Auditor-General
OOJ	Office of the Judiciary
OPM	Office of the Prime Minister
PECP	Public Education and Corruption Prevention
PSSR	Public Service Staff Rules
SDG	Sustainable Development Goals
TAW	Treasury Authorization Warrants
ULIMS	Urban Land Information Management System
UNAMC	University of Namibia
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime
UNPAF	United Nations Partnership Framework

Executive Summary

The Namibian Government developed a National Anti-Corruption Strategy and Action Plan 2016-2019 to promote systems of integrity, accountability and transparency. Likewise, to strengthen domestic anti-corruption systems, inclusive of legislation, policies and institutions. It had six strategic objectives which informed the implementation of 75 actions, executed by 22 implementing institutions inclusive of civil society, private and public sectors. The various institutions responded in addressing the fundamental challenges and strengthening the integrity systems. The Strategy was implemented between 2017/2018 and 2019/20 financial years.

The NASC Steering Committee Secretariat conducted the internal evaluation to assess the extent to which the Strategy objectives were met. The findings, lessons learned, and recommendations from the evaluation are envisaged to inform the formulation of the new anti-corruption Strategy 2021-2025.

The evaluation examined various components of the Strategy, including the 75 actions under the Strategy. The evaluation further assessed the structural issues, the role of implementing institutions and reporting and monitoring process against the evaluation criteria of relevance, effectiveness, efficiency, impact (added value), sustainability as well as partnership and cooperation.

For methodology, the evaluators employed a mixed method of document review and four focused-group discussions (Cluster meetings) with stakeholders. A total of 34 stakeholders, in particular, Cluster members participated in the focused group discussions in August 2020.

The evaluation key findings are that the Strategy consisted of 75 actions, of which 70 actions representing 93 per cent have been implemented while 5 (7 %) were not

implemented during the period under review. Out of the 70 NACS actions implemented, 15 (20 %) were completed. 'Completed' in this regard refers to activities that were executed in a single period, in other words, once-off actions. The majority of the actions in the NACS are continuous based on the functions and mandate of the implementing institutions. As such, such actions were successfully accounted for and, therefore, categorised as 'implemented'.

Furthermore, delving into the criteria within the framework of the evaluation, the findings presented are outlined below:

Relevance: The Strategy was the country's response in fulfilling its commitment as a signatory to the United Nations Convention against Corruption (UNCAC). Article 5 of the UNCAC required all State parties to develop anti-corruption strategies. As a member state to the (UNCAC), the Strategy has ensured that all public entities participate to ensure and uphold the rule of law, proper management of public affairs and public property, integrity, transparency and accountability. This was done through progressive policies and programmes that promote accountability and transparency. Besides, the Strategy contributed to the issue of good governance, also fitting

supportively in the context of national development and international instruments. It is also worth noting that although the Strategy's development was finalised in 2016, it remained relevant over the implementation period. One of the challenges was to execute some of the actions promptly. However, the monitoring system and engagement remained instrumental in tracking progress.

Efficiency and Effectiveness: The multi-sectoral Strategy was transverse and required a befitting structure for overall implementation. For adeptness, a body was established to monitor and set-direction for the Strategy. The National Anti-Corruption Steering Committee ("Strategy Steering Committee") was set up during the induction workshop of the Strategy held in February 2017. The Strategy Steering Committee was divided into four Clusters, with each Cluster overseeing the implementation of actions under one or two Strategic objectives. Complementary, a Secretariat, in particular, the Directorate Public Education and Corruption Prevention at the ACC assisted the Steering Committee in monitoring the implementation of the Strategy.

In addition, the Secretariat developed various monitoring tools. Such tools enabled the Secretariat to accord support to the Steering Committee. However, the Secretariat also encountered some challenges such as capacity.

Impact or added value: The Strategy has been an appropriate vehicle for promoting transparency, accountability and ethics. The Strategy enabled the country not only to account for various actions but also implemented policies in closing the loopholes of corruption. It is noted that the three years were short. Moreover, the Strategy obligated institutions to report on some of the activities that they did not report before.

Additionally, the fact that 70 NACS actions, which represent 93 percent, were implemented, had a greater added value on the implementing institutions as this was the first time in the existence of the Namibian nation that a pool of institution in the country was committed to improving their governance systems in order to increase accountability, transparency, integrity and ethics in Namibia.

Sustainability: The strategic objectives and 75 actions were based on the mandate of implementing institutions. Intrinsically, most of the activities continue beyond the Strategy. While the Strategy did not have an exit plan, moving forward, it will be highly recommended that the actions be embedded in the annual plans and implementing agencies' strategic plans.

Established partnerships and cooperation:

Central to the implementation of the Strategy were various stakeholders. Several tools and platforms were initiated and employed to bring stakeholders together. These included the quarterly meetings for implementing institutions and NACS Secretariat, Clusters and NACSC. Members of the NACSC include accounting officers from selected Offices/Ministries/Agencies (O/M/As) and representatives from the private sector, Civil Society Organizations (CSOs) and the media. Moreover, in tracking progress, a reporting process was developed. The various engagement platforms, such as the Cluster meetings were also instrumental and useful. Broadly, the platforms exacerbated the promotion of accountability and transparency.

In light of the findings, the evaluation recommends the following:

- Majority of the actions should be retained in the new Strategy 2021-2025 as they are enshrined in the mandate of the lead institutions, and some were not fully implemented;
- Revisit the strategic objectives to ensure that they respond to current and evolving national needs (integrity systems, good governance, and accountability). An analysis would inform this of the patterns and other developments. Not only in the sectors initially enshrined in the Strategy but also in other sectors such as environment, agriculture, tourism or as deemed relevant;
- Furthermore, the Clusters and Steering Committee meeting should be retained.

They were instrumental in fostering cooperation and served as a platform to account for actions and exchange of ideas;

- A dedicated team should be assigned as Secretariat to the coordination of the new Strategy;
- There should be dedicated resources for capacity building. Moreover, the Secretariat must be actively involved in specific sector programmes under the Strategy;
- Moving forward, it is recommended that the reporting and monitoring tools be revised to align with the new Strategy and remain relevant;
- To ensure institutions take ownership, it is recommended that robust engagement be undertaken at all stages of the Strategy by the Secretariat. These include the formulation process, inception, and throughout the implementation process;
- While the National Anti-Corruption Steering Committee (NACSC) was well-placed to set direction and play an oversight role, it is recommended that there should be another oversight body above the NACSC, in particular, a parliamentary committee responsible for governance, accountability, transparency, integrity,

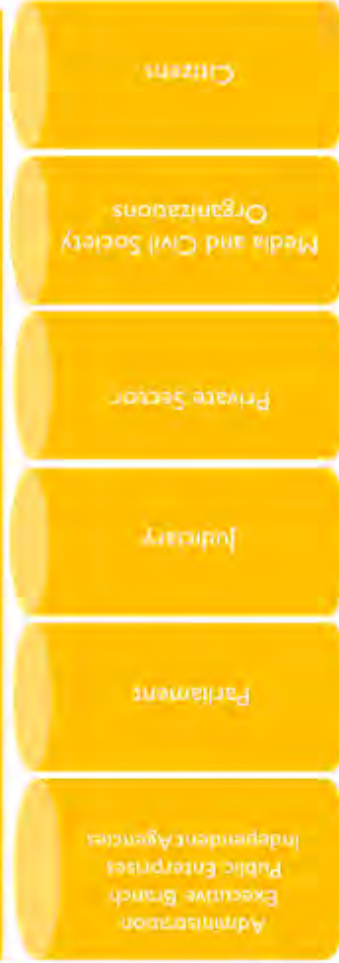
ethics and anti-corruption to account to the Namibian nation on the NACS implementation;

- Another critical recommendation is that political office bearers (i.e. minister or deputy ministers, governors, councillors), Board members should be members of the Steering Committee. This imperative in order to strengthen the monitoring of the NACS implementation process. This aspect should be considered in the drafting of the new Strategy;
- The NACSC Clusters should also be retained with the membership being strictly Accounting Officers (Executive Directors) and CEOs.
- The optimal way of moving forward into the new Strategy should be to develop an exit plan and foster robust cooperation with the development agencies;
- Also, the next Strategy should have clear Key Performance Indicators and targets. And this should come from the key implementing institutions;
- There is a need for the Steering Committee to update the nation on 'quick gains' regularly. It is therefore recommended that the new Strategy come up with a communication plan in this regard.

Strategic Objectives and Pillars

Strategic Objectives and Pillars

1. Increase political accountability
2. Prevent corruption in government offices, ministries, agencies and public enterprises
3. Strengthen corruption deterrence
4. Educate public on combating corruption
5. Prevent corruption in the private sector
6. Engage civil society and the media in anti-corruption drive



The six Strategic Objectives informed the activities (75 actions) and implementation under the Strategy

The National Anti-Corruption Steering Committee ("Strategy Steering Committee"), assisted by the Secretariat at ACC, monitored the implementation of the Strategy.

Mandate of NACSC include: Decision-making and setting strategic directions for the implementation of the Strategy, being the core body that oversees its implementation

INTRODUCTION AND BACKGROUND

1. INTRODUCTION AND BACKGROUND

1.1 Background

In August 2016, the Namibian Cabinet approved the National Anti-Corruption Strategy and Action Plan 2016-2019 ("Strategy or NACS") as a measure to provide a framework for anti-corruption efforts and foster collaboration. The Strategy aimed to bring all stakeholders under one roof to make their due contribution to promoting good governance. The Namibian Government has underscored good governance as essential in achieving sustainable national development, as indicated under the fourth pillar of Namibia's Fifth National Development Plan (NDP5) (National Planning Commission, 2017).

The development of the Strategy was also in line with Article 5 of the UNCAC, which requires State Parties to develop and implement a comprehensive national anti-corruption strategy. Namibia signed the United Nations Convention against Corruption (UNCAC) in 2003 and ratified it in 2004 (United Nations, 2020).

The following six Strategic Objectives informed the activities (75 actions) and implementation under the Strategy:

- Increasing level of political accountability;
- Preventing corruption in government offices, ministries, agencies and public enterprises;
- Strengthening efforts to deter corruption;
- Conducting extensive anti-corruption education;
- Preventing corruption in the private sector; and
- Engaging civil society and the media in anti-corruption drive.

While planning of the Strategy started in 2013 and launched in September 2016, its implementation started only in early 2017

and ended in March 2020 (the last quarter of the 2019/ 2020 financial year).

An induction workshop Strategy for the members of the National Anti-Corruption Steering Committee ("Strategy Steering Committee OR NACSC") preceded the actual implementation. The Strategy Steering Committee was divided into four Clusters, with each Cluster overseeing the implementation of actions under one or two Strategy objectives. During the workshop, a Secretariat comprising of ACC staff members was also formed. The Strategy Steering Committee served as the oversight body, and as setting the direction for the Strategy implementation. Accordingly, the Secretariat assisted the Strategy Steering Committee in coordinating and monitoring the progress in executing actions under the Strategy.

Activities in the Strategy Action Plan were categorised under Clusters as follows:

Cluster 1 Strategic Objective 1 Increase level of political accountability. Strategic Objective 3 Strengthening efforts to deter corruption

Cluster 2 Strategic Objective 2. Preventing corruption in government offices, ministries, agencies and public enterprises

Cluster 3 Strategic Objective 4 conducting extensive anti-corruption education. Strategic Objective 6 engaging civil society and the media in combating corruption

Cluster 4 Strategic Objective 5 Prevent corruption in the private sector . To achieve this, all sectors were required to develop policies and programmes that promote transparency and accountability. Transparency and accountability of government institutions align with achieving Outcome 4 of the United Nations Partnership Framework (UNPAF) 2019-2023.

Throughout the implementation process, organisations were required to report on progress made on their actions. Since the roll-out of the Strategy, the main stakeholders carrying out the 75 actions have been the 22 implementing institutions. These were: Office of the Prime Minister(OPM), Ministry of Safety and Security- Namibian Police Force (NAMPOL), Ministry of Information and Communication Technology(MICT), Ministry of Public Enterprises(MOPE), Ministry of Justice(MOJ), Ministry of Industrialisation, Trade and SME

Development (MITSMED), Ministry of Fisheries and Marine Resources, Ministry of Mines and Energy(MME), Electoral Commission of Namibia, Ministry of Finance(MOF), Parliament, Office of the Auditor-General (OAG), Office of the Judiciary(OOJ), Anti-Corruption Commission(ACC), Media Ombudsman, Editor's Forum, Namibia Chambers of Commerce and Industry(NCCI), Namibia Institute for Public Administration and Management(NIPAM), Financial Intelligence Centre (FIC) and NACSC.

This evaluation report highlights progress made against the Strategic Objectives and actions, and broadly the country's commitment to the fight against corruption. The findings will also pave the way for the new Strategy.

Due to changes in the political landscape and elections, it should be noted that some institutions were renamed or merged. To remain consistent and for uniformity, for reporting, names of institutions are reported as initially set out in the Strategy since its inception.

1.2 Purpose and objectives

The primary purpose of this evaluation is to assess the progress made in the execution of activities under the Strategy, the role of implementing institutions as well as reporting processes. The exercise further delved into the structural issues, including the capacity as well as positioning of the

oversight Strategy Steering Committee and the role of Secretariat as a monitoring body.

The Strategy Secretariat at the ACC conducted the evaluation. The objectives of the evaluation were to: (1) determine the extent to which the Strategy objectives were met, (2) determine the progress made by implementing institutions in carrying out their commitments to close the loopholes for corruption under the Strategy and (3) draw a concrete conclusion and derive best practices for executing the next phase of the Strategy (2021 to 2025).

The internal assessment helped to optimise the interventions and programmes in the fight against corruption. While the recommendations and lessons learned would enhance the coherence of actions in the next Strategy.

1.3 Evaluation Scope

The evaluation entailed an assessment of the progress made on the activities implemented under the six Strategic Objectives, roles of implementing organisations as well as the Structure and reporting processes. Cognisant of the transversely of the Strategy and anti-corruption efforts, the evaluation further assessed the Strategy based on the criteria, namely; relevance, efficiency, effectiveness, impact and sustainability, established partnerships and cooperation.

The assessment of activities focused on 2017/18 up until 2019/2020 financial years, which covers the implementation period of the Strategy. All activities assessed, therefore fall within the aforementioned timeframe.

The evaluation matrix and evaluation questions contained in the Inception Report (annexure), as well as the methodology section of this report, contains details on the data collection tools employed to answer them.

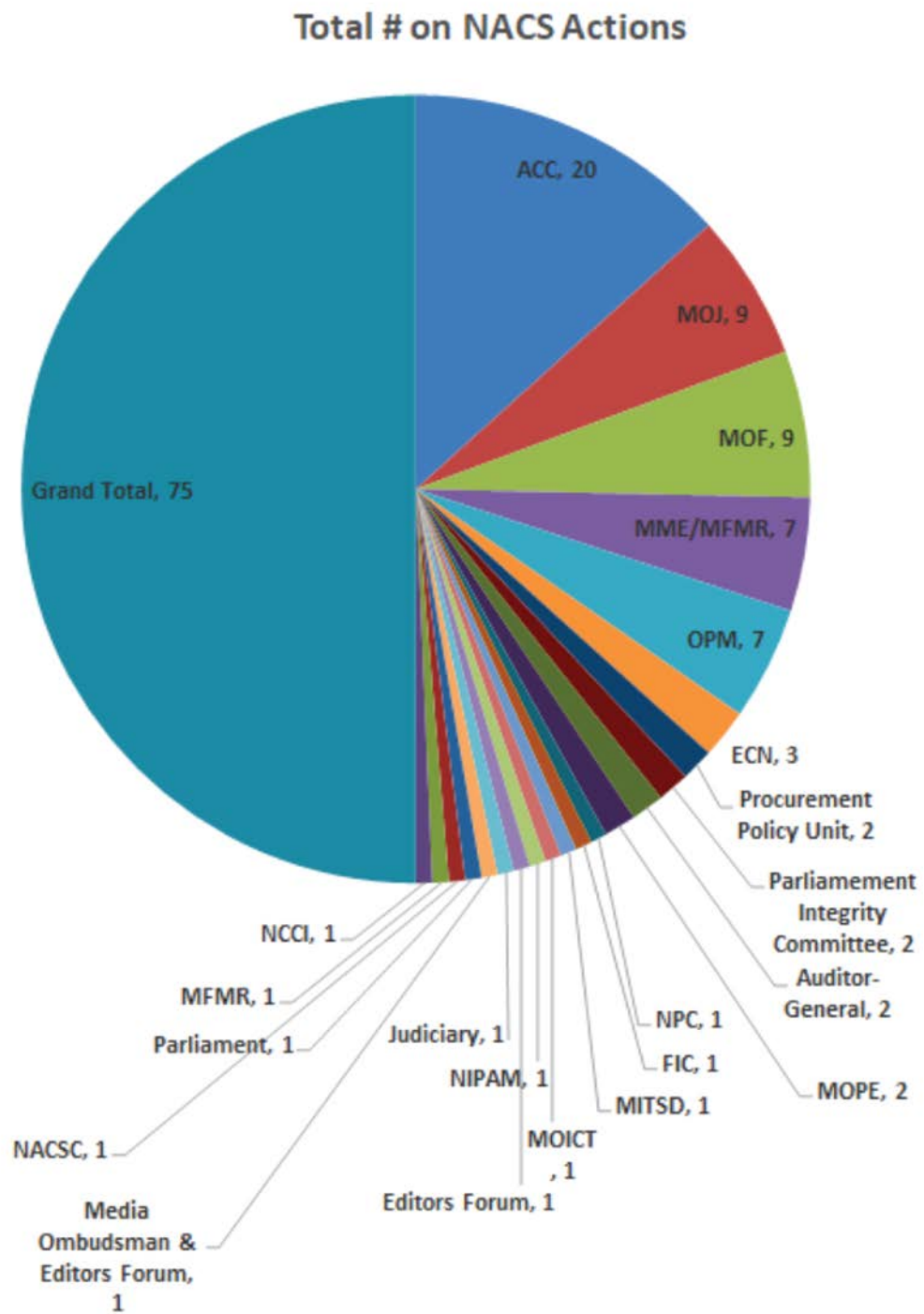


Figure 1: Implementing institutions

METHODOLOGY

2. METHODOLOGY

The evaluation was conducted between August and September in the 2020/21 financial year. The internal evaluation included various phases: development of the guidelines, inception report, desk research/ data collection, data analysis, report preparation, validation in the framework of the evaluation and finalisation of the report. Due to the cross-cutting issues and complexity of the Strategy (evaluation subject), the exercise employed both qualitative and quantitative methods approach. The methodology enabled the evaluators to derive comprehensive information and quantifiable data. The following sections provide more details on the different data collection methods used.

It is worth noting that an initial process evaluation method was recommended in the internal draft Monitoring, Evaluation and Reporting Plan of the Strategy in assessing the performance of the Strategy. However, the process evaluation method was applicable for this evaluation only if mid-term evaluations preceded it. Thus the outcome evaluation employed for this evaluation was deemed appropriate in cognisance of the objectives, context and research questions of this evaluation.

2.1 Data Collection and Analysis

2.1.1 Document review and analysis

The document analysis relied on various processes. Firstly, a review and mapping of the documents were carried out in conducting this assignment. The review of documents helped to identify and measure the implementation process that may have either contributed to or limited the reach and effectiveness of the project's objectives and outputs. The revision also informed the formulation of the evaluation questions and extent of examination. Post the documents review; focused-group discussions were held for three Clusters (one, two and three). Details

on the focused group discussion are presented in a separate sub-section. Accordingly, data from the documents were triangulated with the data derived from the Cluster meetings.

Post the preparation of the draft report, the report was submitted to the ACC executive management. After that, the evaluation will also employ a participatory approach in the form of stakeholders' consultations at the validation stage of the exercise. The review of documents included both primary and secondary data sources, and general research around corruption, the political and socio-economic context of Namibia during the period under review.

Documents reviewed are listed in the table below:

Area	Primary source(s)	Secondary source(s)
Legal & policy documents Reports/ other documents	<ul style="list-style-type: none">• Strategy• Reports by implementing agencies• Cluster minutes, quarterly progress and Strategy annual reports• ACC annual reports• Project monitoring reports/ tools• Feedback from implementing institutions, stakeholders and partners	<ul style="list-style-type: none">• media reports

2.1.2 Focused-group discussions

Various stakeholders were consulted and engaged during the evaluation exercise. Focused-group discussions with the Secretariat and 34 members of the four Clusters (were conducted on 25 and 28 August 2020 as well as 24 September 2020 respectively.

As part of the discussion, in the first step, a presentation on the strategy formulation, implementation, progress and evaluation was done. Thereafter, a discussion, on the various issues related to the implementation, progress, challenges were held. The discussions, as indicated under section 2.1.1, have been incorporated as part of the overall report.

2.1.3 Limitations

Some limitations were encountered during the evaluation process. The initially set period for desk review was overambitious against the skills set and magnitude of the work. Thus the draft report was only finalised on 18 September 2020 as opposed to 31 August 2020. The lack of funds, virtual accounts and current global COVID-19 pandemic also impacted the consultative meetings which had limited physical interactions. The evaluation was also conducted by Strategy Secretariat, the body that monitored the Strategy implementation process, which may pose a degree of biasness. However, the evaluation team had vowed to execute the assessment with high professionalism and objectivity. This shortcoming was also countered by subjecting the report to external review and validation as part of quality assurance.





FINDINGS AND PROGRESS MADE

3. FINDINGS AND PROGRESS MADE

This chapter presents evaluation findings that relate to the entirety of the Strategy and it is structured as follows: Firstly, a brief on the general findings are provided. Secondly, the evaluation presents an analysis of the Strategic Objectives and actions against the initially set indicators in the matrix (Annexure 1). Complementary, and in pursuit of the subject in-depth, for analysis, a detailed, comprehensive analysis on what transpired during the implementation process, inclusive of the accountable achievements or challenges encountered for a specific period or financial year is provided. Finally, the findings and analysis by the evaluation criteria of relevance, effectiveness, efficiency and added value are presented under dedicated sub-sections.

The table below shows the status of NACS actions implementation by Strategic objectives.

Strategic Objectives	Actions Planned	Actions Implemented	Actions Completed	Actions not implemented
1-Increasing the level of political accountability	3	3	-	-
2-Preventing corruption in government offices, ministries, agencies and public enterprises	32	29	5	3
3- Strengthening efforts to deter corruption	17	16	7	1
4-Conducting extensive anti-corruption education	7	7	2	-
5-Preventing corruption in the private sectors	10	9	-	1
6- Engaging Civil Society & the Media in Combating Corruption	6	6	1	-
Total	75	70	15	5

Out of the 22 implementing institutions, 15 lead institutions known to have implemented or reported on the progress of their actions are (ACC, ECN, FIC, MOF, MOJ, MME (Diamond Affairs), MFMR,

3.1 General findings- How we did?

The Strategy consisted of 75 actions, of which 70 actions representing 93 per cent have been implemented while 5 (7 %) were not implemented during the period under review. Out of the 70 NACS actions implemented, 15 (20 %) were completed. 'Completed' in this regard refers to activities that were executed in a single period, in other words, once-off actions. The majority of the actions in the NACS are continuous based on the functions and mandate of the implementing institutions. As such, such actions were successfully accounted for and, therefore, categorised as 'implemented'.

MOPE, NIPAM, NPC, OAG, OPM, Media Ombudsman, Procurement Policy Unit, MITSMED).

The following table summarises the progress of NACS activities by Strategic Objectives and Responsible Implementing Organisations.

Strategic Objectives and Implementing Organizations	# of NACS actions by Status			
	Implemented	Implemented and completed	Not implemented	Grand Total
1-Increasing the level of political accountability	3	-	-	3
ECN	3	-	-	3
2-Preventing corruption in government offices, ministries, agencies and public enterprises	24	5	3	32
ACC	5	2	-	7
Auditor-General	2	-	-	2
Judiciary	-	1	-	1
MOF	5	1	1	7
MOICT	-	-	1	1
MOJ	1	-	-	1
MOPE	-	1	1	2
OPM	6	-	-	6
Parliament Integrity Committee	2	-	-	2
Parliament	1	-	-	1
Procurement Policy Unit	2	-	-	2
3- Strengthening efforts to deter corruption	8	7	2	17
ACC	5	1	-	6
FIC	1	-	-	1
MOF	2	-	-	2
MOJ	1	6	2	8
OPM	-	1	-	1
4-Conducting extensive anti-corruption education	5	2	-	7
ACC	4	2	-	6
NIPAM	1	-	-	1

5-Preventing corruption in the private sectors	9	-	1	10
MFMR	1	-	-	1
MITSMED	1	-	-	1
MME/MFMR	7	-	-	7
NCCI	-	-	1	1
6- Engaging Civil Society & the Media in Combating Corruption	5	-	1	6
ACC	1	-	-	1
Editors Forum	1	-	-	1
Media Ombudsman & Editors Forum	-	1	-	1
MOJ	1	-	-	1
NACSC	1	-	-	1
NPC	1	-	-	1

However, their activities are at varying degrees of implementation. Details and progress on each of the 75 actions are contained and highlighted in sub-section 3.2.

Meanwhile, four themes emerged after categorising the 75 actions under the six Strategic Objectives of NACS:

- 1. Education-** to include NACS activities that aim to increase awareness and knowledge about corruption, or making information on corruption easier to understand; or increase awareness about specific actions to deter corruption;
- 2. Enabling Policies and Legislation** – to include NACS activities related to legislative processes that result in legislation or an amendment to the legislation, or regulations. Also includes developing anti-corruption policies and regulations related to procurement, code of ethics, etc. in the public service;

3. Institutional Strengthening or Prevention Measures– to include NACS activities such as risk assessments, audits, reviewing compliance, creation of integrity committees, and other mechanisms to address weaknesses in institutions that make corruption possible;

4. Transparency Mechanisms- to include NACS activities that demonstrate openness and transparency of institutions; disclosing information or making it more available; or making decision-making processes more transparent.

Similar outputs were produced under each of the four categories. For example, information campaigns, partnership events to create awareness, and training workshops are all products of education-type of activities. The grouping facilitates the measurement of results.

Outputs	Count
Information campaigns	5
Knowledge products	2
Partnership events	2
Training workshops	14
Grand Total	23

Outputs	Count
Public reports	5
e-Platforms for citizens	1
Budget reports	1
Asset disclosures	2
Transparent allocation mechanism	1
Compliance with EITI	1
Grand Total	11

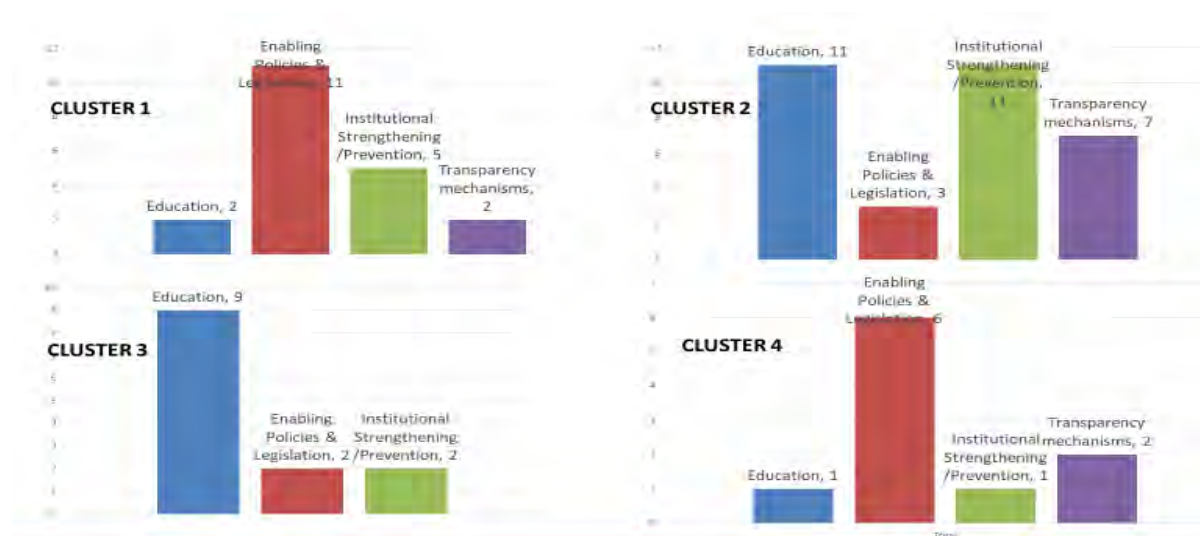


Outputs	Count
Assessment Reports	5
Integrity Committees	2
System Assessments	2
Resource allocation	5
Audit reports	2
Staff retention/recruitment	1
Registration system	1
Media report	1
Grand Total	19

Outputs	Count
Legislation	13
Policies	6
Code of Ethics	3
Grand Total	22

NACS Clusters also had a focus on specific categories of action. Cluster 1 had a higher focus on Enabling Policies and Legislation activities, Cluster 2 had a higher focus on both Education and Institutional Strengthening/Prevention activities, Cluster 3 had a higher focus on Education activities, and Cluster 4 had a higher focus on Enabling Policies and Legislation.

CATEGORIES OF NACS ACTIVITIES UNDER EACH CLUSTER



3.2 Progress made on Strategic Objectives and 75 NACS Actions

This section presents the progress made on each Strategic Objective against the 75 actions.

Main sources for the information in this sub-section are the NACS annual reports (2017/18, (Anti Corruption Commission, 2018), (Anti-Corruption Commission, 2019) (Anti-Corruption Commission, 2020).

STRATEGIC OBJECTIVE 1 – INCREASING THE LEVEL OF POLITICAL ACCOUNTABILITY

This Strategic Objective intended to promote political accountability. There were three actions under this Strategic Objective, namely: (1.1.1, 1.1.2, 1.1.3), of which the Electoral Commission of Namibia (ECN) was the lead implementing institution. The three actions were all implemented during the period under review as outlined below.

Specific Objective 1.1: Increasing the transparency of political party financing

Action 1.1.1: *Annual reviews on whether provisions of party transparency as contained in Chapter 4 of the Electoral Act, No. 5 of 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*

The ECN was the implementing agency tasked with increasing the transparency of political party financing. Chapter 4 of the Electoral Act, 2014 (Act No. 5 of 2014) makes provision for comprehensive regulation of political party financing and accountability by political parties. Progress in this area under NACS is reported under the following specific objective.

During 2017/ 2018 financial year, about 40% progress was made in terms of determining that the provisions of party transparency as contained in Chapter 4 of

the Electoral Act, 2014 have been complied with. In fact, over the years, the ECN recorded a decline in the number of political parties represented in Parliament submitting audited financial statements as follows: (2018/19 (1); 2017/18 (5); 2016/17 (8); 2015/16 (9) and 2014/15 (3).

The evaluation found that the ECN is faced with the challenge of enforcing some of the provisions of the Electoral Act 2014, Chapter 4. In particular, on provisions related to submission of audited reports by political parties (sections 158 and 160); declaration of assets and liabilities (section 139); disclosure of foreign and domestic financing received (section 141); accounting of funding received political parties (section 158); and records and audit of registered parties (section 140). This is despite the efforts made by the ECN consulting political parties regarding compliance with the provisions of Chapter 4 of the Electoral Act 2014, especially with the Secretary Generals and Authorised Representatives of respective parties registered with ECN. The trend, dubbed as 'worrisome', is attributed to an established culture of non-compliance amongst political parties and impunity due to non-enforcement of legal penalties for non-compliance.

Recommendation(s):

Political accountability is instrumental in upholding democracy and transparency. To this effect, there is a need for enforcement from both ECN (de-register non-compliant parties) and National Assembly (withdraw funding from non-compliant parties. More so, the institution providing funding ought to alert the accounting office for political parties when such funding is provided. The harmonisation and improved communication are anticipated to lead to improved accountability. It should be noted that it is imperative, given that political parties are central to the governing of the country, democracy as

well as setting the direction for national development, therefore, this action should be carried over to the new Strategy. It is also recommended to consider using the term Political Entities instead of Political Parties (it incorporates independent candidates). Furthermore, it is recommended that the term Political Party be defined.

Action 1.1.2: *Ensure that political parties comply with the relevant sections of the Electoral Act 2014.*

Under this item, amendments to the various sections Electoral Act, 2014 were required before ECN could determine compliance by political parties. As such, recommendations for amendments to the following Sections were made: 1,4, 6, 13, 18, 19, 20, 22, 24, 26, 28, 29, 31, 36, 39, 47, 55, 60, 64, 67, 78, 79, 80, 81, 86, 93, 98, 105, 110, 111, 113, 124, 136, 139, 141, 148, 154-161, 167, 188 and 205. It is mentioned in the 2017/2018 NACS annual report that the then formulated amendments was discussed at a workshop in April 2018.

Thereafter, the ECN had reported progress on this action. The ECN thus issued the new regulations relating to the declaration of assets and liabilities, disclosure of foreign and domestic financing of political parties, organisation or other persons dealing with Section 139-142 of the Electoral Act. The regulations were gazetted on 18 November 2019 (in Gazette No. 7053 of 2019). The afore-mentioned progress is reflected in the 2018/19 NACS annual report. However, the regulations contain a sub-section stating that the ECN must request political parties in writing to submit the first declaration of assets and liabilities. After that, the parties will submit it annually 21 days after the official opening of the National Assembly. This means that the ECN must first inform the parties in writing. This has not been done yet because the ECN conducted national elections in November 2019.

Furthermore, the matter was expected to be tabled at the ECN meeting scheduled for February 2020 to determine the dates when to implement the regulations as well as explaining of modalities to be followed by political parties after the 2019 national elections.

Recommendation(s): Since the regulations have been issued, progress on this action is deemed instrumental in enforcing action one. It is recommended that be fused into the action 1.1.1.

Action 1.1.3: *Post-election reports will be compiled immediately following each election and will contain recommendations for possible improvement of the legislation or subordinate legislation. Reports will be published*

In line with the provisions to conduct elections every five years, since the implementation of the Strategy, the elections were held in 2019. As customary and as required, ECN is underway with the compilation of the post-election report for the 2019 Presidential and National Assembly elections. At the stage of the evaluation, 85 per cent of the work had been completed concerning the afore-mentioned election report, with only the layout designing and printing remaining. It should be noted that at the inception of the Strategy in 2017, the presidential and national assembly elections were held in 2014. The last post-election reports were thus published during the 2014 Presidential and National Assembly Elections and in 2015 during the Regional and Local Authority Elections. Additionally, a Compendium consisting of two volumes were published in 2016 as well as the Regional Council Ncuncuni Performance Assessment report (2018) (Electoral Commission of Namibia, 2020).

Recommendation(s): It is recommended that it remains and be included in the new Strategy, but to be amended to read as follows:

Compile and submit the Post-elections report within prescribed period in terms of section 116 of the Electoral Act.

Summary of progress made on Strategic Objective 1

ECN has issued new regulations relating to the declaration of assets and liabilities, disclosure of foreign and domestic financing of political parties, organisation or other persons dealing with Section 139 to 142 of the Electoral Act. The regulations were gazetted on 18 November 2019 (in Gazette No. 7053 of 2019). If the new regulations are fully adhered to by political parties, the level of political accountability and transparency will increase in Namibia. At the stage of the evaluation, 85 per cent of the work had been completed with respect to the afore-mentioned election report, with only the layout designing and printing remaining.

Strategic Objective 2-Preventing corruption in government offices, ministries, agencies and public enterprises

This Strategic Objective covers a large portion of the Strategy. The activities under this Strategic Objective consist of reforms in the internal management of public resources and administration to reduce opportunities and incentives for corruption while minimising wastages in public institutions.

There were 32 NACS actions under this Strategic Objective. A total of 29 actions were implemented, of which five actions, namely; (2.1.2, 2.1.3-ACC; 2.3.1-MOPE; 2.4.1-MOJ; 2.7.2-MOF) were completed. Throughout the process of implementation, no reports were received from implementing agencies of three (3) actions (2.2.3-MICT; 2.3.2-MOPE; 2.7.3-MOF).

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*

In the Strategy, this action was set to be actioned in 2018/19 financial year. However, the action was not executed as the appointment of the Deputy Director for the Integrity Unit in the Office of the Prime Minister was only concluded in 2019.

Recommendation(s): This action should be included in the new Strategy. However there is a need for more specific SMART (specific, measurable, attainable, relevant, time bound) objective that specifies the principles of good governance. Furthermore, MURD should be included as a leading Institution to represent the RC and LAs. This is because they (RC and LAs) do not fall under Public Service Act but Regional Councils Act and Local Authorities Act, respectively.

Meanwhile, Risk and Audit Committees should be established in Ministries, Regional Councils and Local Authorities (Municipalities Part 2 and Town Councils). These committees should be included in this action plan as a principle of good governance. The Risk and Audit Committee should be an independent body comprises of individuals with skills in Finance, Auditing, Accounting, Investigation, Legal studies, Local Government Studies, IT and Engineering.

Reporting System:

The Internal Auditors/Risk Officers in the Ministries, Regional Councils and Local Authorities should administratively report to Accounting Officers and functionally report to the Risk and Audit Committee for the principle of good governance.

Duties and Responsibilities of Risk and Audit Committee:

The duties and responsibilities of the Risk and Audit Committee should be clearly stipulated to ensure compliance and accountability in Ministries, Regional Council and Local Authorities.

Action 2.1.2: *Design and implement a risk assessment test on corruption vulnerabilities in O/M/As and PEs in three pilot institutions. Based on the assessments, an integrity plan for each of the pilot institutions will be designed and the results be made publicly available. Based thereon, the assessment test will be adjusted and implemented in all O/M/As and PEs. Reports and integrity plans based on assessments will be made publicly available*

During the 2017/2018 financial year, ACC conducted three pilot Corruption Risk Assessments with the Namibia Qualification Authority, Ministry of Fisheries and Marine Resources, and Ministry of Finance.

In the same year, monitoring of the CRA mitigation plans for the Ministry of Finance

were also undertaken at the following borders: Walvis Bay Port, Wenela, Muhembo, Oshikango, Noordoewer, Ariamsvlei and Trans-Kalahari Border Post respectively.

Although the targets for the pilot CRAs were met, the ACC continued implementing this activity. During the 2019/20 financial year, two Corruption Risk Assessment workshops were conducted with Kunene Region for the members of the Namibia Police Force (NAMPOL) as well as the Fisheries Observer Agency.

Before the CRAs were piloted, the ACC developed a Corruption Risk Assessment Guide, which served as a reference for ACC staff when conducting CRAs.

Recommendation(s): The new Strategy should specify its Corruption Risk Assessment and have an action on capacity building for Integrity Committees and Risk Officer/Internal Audit Departments/Directorates/Divisions in institutions to conduct their own Corruption Risk Assessments guided by ACC and ACC should be the external verifier, validator and overseer.

The Ministry of Public Enterprises and MURD should also be included as lead institutions to ensure that Corruption Risk Assessment is done in PE, RCs and LAs respectively.

Action 2.1.3: *A one page integrity pledge will be designed through a consultative process for each of the institutions referred to in paragraph 2.1.2 and adopted by such institutions. This pledge will illustratively list a set of positive principles and values to guide ethical conduct, including integrity, honesty, objectivity and impartiality*

During the year under review, the Office of the Prime Minister in response to Action 2.1.3, established an Integrity Unit under the Department of Public Service

Management to drive the initiative pertaining to the integrity pledge and implementation of the Code of Conduct on Ethics and Integrity. Moreover, the Integrity Pledge was rolled out in the public service in 2019.

Recommendation(s): There is need to have MURD and MoPE as leading Institution to ensure that this action is rolled-out to RCs, LAs and PE.

Action 2.1.4: *An integrity committee consisting of staff members of an O/M/A or PEs will be appointed by the accounting officer of any such institution. Any such committee will be charged with overseeing the implementation of integrity systems and plans complying with provisions thereof and compiling annual ethics and transparency reports. The integrity committee members will also assist colleagues in maintaining their personal integrity*

During the period under review, OPM issued the PSSR E.X/II –Public Service Code of Conduct, Integrity and Ethics, which facilitated the appointment of integrity committee members. Subsequently, the Integrity Committees were established in Offices, Ministries and Agencies (O/M/As. Training of Integrity Committees was conducted in October and November 2019. About 44 O/M/As and RCs were trained. A report with recommendations was also compiled and submitted to the OPM.

Recommendation(s): The evaluation report should clearly provide statistics on this action with regard to how many O/M/As have implemented the provisions in the Ethics and Integrity Staff Rules mainly on creation of Integrity Committees, and Pledges.

There is need to have MURD and MPE as leading Institution to ensure that this action is rolled-out to RCs, LAs and PE.

There is need for Public Service Act reform to include all public entities (RCs, LAs under cluster 1).

Action 2.1.5: *Implement compulsory annual ethics training for staff of O/M/As and PEs. Ethics training will also form part of induction programmes for new staff*

Afore rolling out the actual ethics training, the ACC developed the Ethics Training Guide through a consultative process with key stakeholders. The Ethics Training Guide continues to be used for training of O/M/As, PEs, LAs, and RCs on ethics. A total of 35 OMAS were trained in ethics.

Recommendation(s): The Ethics Training Guide has been developed in the old Strategy but there is still need for training to continue and be accounted for in the new Strategy. Therefore, O/M/As, PEs, LAs should be capacitated to take ownership of their own training through the Training of Trainers to rollout training to all the integrity committees and Officials. In addition, MURD should partner with civil society organisations (ALAN, ARC and NALAO) to sensitise their members to implement the Strategy.

Specific Objective 2.2: Increasing institutional transparency by increasing the availability of public data made available by public authorities

Action 2.2.1: *Access to Information legislation, will be introduced to ensure access to public information and transparency of decision-making processes to further provide for relevant action to protect information*

During the implementation period, the Government of the Republic of Namibia through the line Ministry of Information and Communication Technology drafted the

Access to Information Bill which has gone through various process stages before it was tabled in Parliament during 2019/2020 Financial Year. In the interim, the Bill has been proposed and tabled in Parliament and is now at Committee stages at National Assembly.

Recommendation(s): There is a need for enough budgetary provision for the facilitation of the implementation and operationalization of the Bill. This Bill will require both administrative and legal structure for its implementation. There is also a need for public education to create awareness and sensitisation among various stakeholders and public at large.

Action: 2.2.2: *Continuously improving e-governance, e-administration and e-justice solutions as platforms for citizens accessing information in public institutions*

In the 2017/18, 2018/19 and 2019/20 financial years, the following transpired:

- o E-Justice - an electronic platform for filling, case management, and diarizing of court document within the litigation process(www.ejustice.com.na);
- o E-Labour: Electronic Labour Information Management System (ELIMS), a system which enables employees and employers to file for cases online, e.g. unfair dismissals and treatment, etc. (<http://elims.gov.na>);
- o Online portal for job seekers: Namibia Integrated Employment Information System(NIEIS), which registers job seekers, vacancies in the public and private sector and assist job-seekers in finding suitable employment (<http://www.namibiaatwork.gov.na/index.php/nieis>);
- o Online application for Environmental Certificate which contains information related to

environmental impact assessment (<http://eia.met.gov.na>);

- o National Youth Credit Scheme – which administers loans disbursed to youth in business. The youth can use the application to view the status of their applications (<http://nycs-mis.gov.na>);
- o Urban Land Information Management System (ULIMS)- which is used to monitor land sales and financial management by the Local Authorities (<http://ulims.gov.na>);
- o Adults Education Information Management System (AEIMS)- System to record the information about the promoters of adult education and the students' activities (<http://aeims.gov.na>);
- o Online application for the Namibia Students Financial Assistance Fund (www.NSFAF.fund);
- o Online Business Registration – an online portal where a client can confirm the availability of a company name. Reservation of names and companies registration can be made online partially due to outstanding legislation that allows for e-signature and payments to BIPA (www.bipa.na);
- o E-Birth notification of children born at health facilities- system facilitates notification of birth, improves birth registration and provide vital statistics. Access is provided to health facilities to register births with Home Affairs.

Recommendation(s): OPM to strengthen compliance on O/M/As to oversee all ITC procurements and to ensure that such procurement is only done in consultation and certification by OPM. OPM should also conduct more awareness to O/M/As and collaborate with MoF for payments only to be made after certification by OPM. OPM should also develop a tool that will strengthen the compliance.

Action 2.2.3: *Implementing civic education programmes for promoting ethics, integrity, openness and access to and protection of information through relevant educational media and the establishing of regional access centres*

During the review period, the Ministry of Information and Communication Technology, through the Nationhood and National Pride (NNP) programme and its 14 Regional Offices conducted outreach activities and programmes aimed at educating Namibians on the need to promote ethics, integrity, openness and access to information by the public.

Complementary, the Ministry developed the Government Communication Plan and Social Media Use Policy in the 2017/18 financial year to respond to Pillar One of the Harambee Prosperity Plan on issues of good governance, transparency and accountability in the public sector.

Meanwhile, Cabinet at its 14th Decision Making Meeting, approved the NNP National Strategic Framework and its Implementation Plan for 2020 – 2025. Of essence here is the Strategic Pillar Five of the Framework that talks about communication, education and awareness which calls for the intensification of communication, education and awareness efforts to ensure that the programme achieves its overall objective of enhancing nationhood, patriotism, respectfulness in order to realise a unified and prosperous nation guided by ethical values, integrity, dignity and empathy.

Through the implementation of this programme, the Ministry in partnership with other institutions including the ACC, is convinced that significant progress will be made during the next phase of implementation of the second National

Anti-Corruption Strategy and its Action Plan.

Recommendation(s): It is recommend that the activity be carried over to the next phase. It is further recommended that ACC develops close collaboration and coordination with the Ministry of Information and Communication Technology to ensure synergy and programme implementation strategies for the success of this undertaking.

Specific Objective 2.3 Enhancing transparency and integrity specifically in public enterprises

Action 2.3.1: *Standardise regulations and policies for PEs*

In 2017/18 financial year, the MOPE reported 30% progress in its plan to standardize regulations and policies for Pes, in terms of crafting and establishing generally accepted common principles of corporate governance and issuing Directives regarding Governance Agreements. The standardized regulations and policies for Pes would be in place after Parliament passes the consolidated Public Enterprises Governance law. Meanwhile, the National Assembly passed the Bill to amend the Law and has since referred the Bill to the National Council for review.

Cabinet had approved a comprehensive manual on "Policy Frameworks, Principles and Directives". Several frameworks, including those guiding the remunerations of Board Directors, Chief Executive Officers/ Managing Directors and Senior Managers of PE's, were adopted. MOPE has been successful in the number of Directives as well as some Generally Accepted Common Principles of Corporate Governance that has been issued to Pes the previous year.

On 17 May 2019, Ministry of Public Enterprises introduced the Public

Enterprises Governance Act, 2019 (Act NO.1 of 2019). The Act aimed at making provision for the efficient governance of public enterprises and the monitoring of their performance; to make provision for the restructuring public enterprises; to provide for the powers and functions of the Minister of Public Enterprises, and to make provision for incidental matters

Recommendation(s): The implementation of this action should be included in the new Strategy and be monitored.

Action 2.3.2: *Reports and data on the conduct and performance of all Pes are made available publicly in accordance with the relevant law*

The process to formulate Hybrid Governance Model transitional governance, the measure was embarked upon in 2017/18 and adopted by Cabinet. As part of the process, the PE's were required to align their procurement policies with the Procurement Act, 2015 in the interest of uniformity and transparency in procurement by public enterprises. A year on, in 2018/19, the MOPE had introduced an e-system, which was used for storing and capturing all information in their sector, including PEs. During cluster meeting the Ministry indicated that they will provide information.

The database for all PEs was established, and the non-compliant PEs were identified, and the line Ministers were informed through official letters. Compliance reports were produced.

Recommendation(s): The implementation of this action should be monitored, and is thus recommended for inclusion in the new Strategy.

Specific Objective 2.4: Strengthening the integrity and transparency of the Judiciary

Action 2.4.1: *An analysis of the judicial management systems in Namibia will be conducted to ascertain the degree of data generation and also to what extent such data is being used to streamline the efficiency of the Judiciary*

During the 2017/2018 financial year, an e-litigation system (eJustice) a web-based end-to-end electronic filing and case management system were developed for the High Court of Namibia's civil stream accessible for court-users anytime, anywhere. E-Justice is now fully operational at the High Court of Namibia in Windhoek and Oshakati and that will be rolled out to the Supreme Court. The installation of e-Justice has commenced at the Supreme Court.

In 2018/19, NAMCIS (Namibia Magistrates Court Information System), a management system used to capture data including cash flow at Lower Courts, was operational at 28 Magistrates District Courts out of 34 Districts. NAMCIS is now functional at 31 Districts out of 34 Magistrates' District Courts and will be rolled over to the remaining 3 Magistrates District Courts.

The introduction of Court Connected Mediation, a form of Alternative Dispute Resolution (ADR) at High Court of Namibia contributed to efficiency administration of justice. It has freed court time for judges to concentrate on those disputes which are not susceptible to resolution outside court and reduced litigation costs for litigants.

Furthermore, the establishment of a new traffic court (magistrates' court) handling all traffic offences cases and commercial court (high court) in Windhoek highlights commitment to streamline the efficiency of the judiciary.

Recommendation(s): The action should be amended to include all judicial reform initiatives introduced to streamline the efficiency of the judiciary in the next Strategy. The Judiciary has not yet completed the roll-out of the NAMCIS to all districts and e-justice at Supreme Court.

Action: 2.4.2: *Adequate resources availed to the Judiciary to ensure that the courts have sufficient and well-trained staff, as well as the necessary infrastructural resources and facilities sufficient and necessary for the effective and efficient operation of the courts*

Part of the progress on this action was reported under action 2.4.2 because they are inter-related. It is, however, worth noting that the Office of the Judiciary reported that 39 functional training programmes were organized by the respective directorates in addition to generic training programmes organized by HRD. Capacity building has benefited a total of 222 OoJ staff in which 75 were Judicial Officials.

The Ministry of Justice (MoJ) consulted with the Office of the Judiciary to determine which courts need upgrades and to identify new projects. The Traffic Court in Windhoek was completed and became operational on 2 May 2018. The periodical court at Kamanjab was upgraded. The construction of Katima Mulilo Magistrates' Court was completed, and the conversion and renovation of High Court Commercial Court was done. Likewise, upgrades for High Court and for Magistrates Periodical Courts at Hosea Kutako and Dordabis were still in the process in the said year.

Recommendation(s): Ministry of Justice and Office of the Judiciary shared this action. The activity needed to be separated in the new Strategy. OoJ was responsible for adequate resources

availed to the Judiciary to ensure that the courts have sufficient and well-trained staff. However, the training of the staff member was not conducted. This action should be included in the new Strategy and should include all judicial officers as well as court support staff. Ministry of Justice was responsible for the necessary infrastructural resources and facilities sufficient and necessary for the effective and efficient operation of the courts.

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*

During 2017/18 financial year, the budget was allocated for Parliamentarian oversight role and released on time by the Treasury. Four quarterly Treasury Authorization warrants were released. While in the 2018/19 financial year, Treasury Authorization Warrants (TAW) was issued to the National Assembly and National Council within the respective appropriated amounts. Again, the MOF reported that the availing of the budgetary resources to Parliament was achieved at the beginning of the financial year 2019/2020. It should be noted that this activity is being conducted annually.

Recommendation(s): Parliament indicated that more funds are needed. Therefore, the action should continue in the new Strategy.

Action 2.5.2: *Parliament will annually publish a report on compliance with their specific rules on asset disclosure*

It is noted that in 2017/18 specifically, on the 23 May 2017 the National Council (NC) Members submitted their Assets disclosure

forms. Again in 2018, the National Council set the deadline of 23 May 2018 for members of the National Council to submit their asset disclosure forms and that all members adhered to the deadline. The Secretary of National Council was able to finalize the register to be deposited at the Parliament Library before the 22 July 2018.

Again 2018/19, Parliament reported that all Members of Parliament (MPs) have complied with the rules of asset disclosure and a report was published as required by legislation. In addition, Regional Councillors declared their interests and assets annually. It was also reported that the MP's have a Code of Conduct which was adopted by the National Council and it is fully operational. Furthermore, the National Council reported that their financial reports are available in their library for viewing by the public and any interested parties.

During 2019/2020, the National Assembly reported that the Members of Parliament (MPs) disclose their assets annually. It was further reported that close to 80% of MPs had already disclosed their assets while 20% have not done so in the financial year. The number of non-disclosure(s) according to the report is manageable to trace.

Recommendation(s):

Amend/reform/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.

Action 2.5.3: *Training courses on best practices will be developed and offered to MPs and staff*

During the 2017/18 financial year, on 7 May 2018, a sensitization seminar to discuss the importance of the Code of Conduct for MPS and how to conduct Public Hearings objectively as well as on the Regulations of the Procurement Act was conducted.

In 2018/19, the National Assembly reported that four MPs and staff attended an International workshop which included best practices. Tailored training on Parliamentary Practice and Conduct was organised for members of the National Council with UNAM. The training took place on the 09 July 2018 and was offered over 11 weeks until 30 November 2018, focusing on modules such as English Communication, Constitutional Law Administrative Law, Customary Law, legislative draft and the Role of Parliament in a Constitutional Democracy.

Overall, the following capacity building activities were undertaken:

- The new staff of the National Council attended training on Protocol and Diplomacy
- The Ministerial implementation team attended training on the monitoring and implementation of the Strategic Plan
- Attachment to the Parliament of Ghana to learn the best practices initiated and,
- The drivers were sent for defensive driving training and conduct.

Recommendation(s): This action should be revised, and included in the new Strategy because MPs change based on political

dynamics and leadership. Moreover, the phrase “*training on best practices*” was not specific it, thus it should be more specific in new Strategy.

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*

It was reported during 2017/18 that a workshop for members of the National Council Public Accountant Committee was held on 25 June 2018 with stakeholders such as (Auditor-General, Ministry of Finance, Ministry of Urban and Rural Development, National Assembly Public Accounts Committee) to enhance the capacity of the Committee particularly with regard to the review of the Auditor-General report. Concerning integrity and maintaining the dignity and image of the National Council, an in-house refresher seminar was conducted for members on 7 May 2018.

Again, during 2018/19, Parliament reported that regular presentations were conducted to sensitise members of the National Council about conflict of interest and rules on how to conduct themselves in public. In addition, the National Assembly had meetings every Wednesday to discuss and debate on issues of integrity. It was also reported that there were outreach programmes attended by both MPs and staff that incorporate the issue of corruption and public awareness on transparency and accountability. A workshop for members of the National Council Public Account Committee was held on 25 June 2018 with stakeholders such as Office of the Auditor General, Ministry of Finance, Ministry of Urban and Rural Development as well as the National Assembly Public Accounts Committee to enhance the capacity of the Committee

particularly concerning the review of the Auditor-General's report.

As in the previous year, during 2019/20 financial year, the National Assembly reported that meetings were held every Wednesday to discuss and debate on issues of integrity.

Recommendation(s): This action should be included in the new Strategy. It should also be conducted annually.

Specific Objective 2.6: Support to public procurement system reform

Action 2.6.1: A public awareness programme on the new procurement legislation will be conducted

With regard to this action, the Procurement Policy Unit (PPU) hosted training sessions for 1267 and 980 bidders during 2017/18 and 2018/19 financial years respectively.

TRAINEES	2017/ 18	2018/19	2019/20
Public entity officials, Accounting Officers	4700	6900	616

During 2019/20, the PPU developed a Public Education Strategy with the aim to educate the general public on matters of public procurement for implementation during 2020/21. The Strategy entails the use of various means and platforms to disseminate public information, educate, and raise awareness on all matters related to public procurement. Such includes the use of information leaflets, posters, booklets for dissemination and social media platforms such as Facebook, Twitter and WhatsApp/Telegram. The Strategy

also includes broadcasting adverts through the local broadcasters and radios with information to be disseminated in different Namibian languages.

Recommendation(s): The action should continue in the next Strategy. PPU to continue conducting public awareness activities on public procurement as per the public Education Strategy year after year.

Action 2.6.2: Training courses in public procurement for members of the – to be established
- Procurement Policy Unit, the Central Procurement Board of Namibia, the Bid Evaluation Committees, and the Independent Review Panel will be developed and presented

In this respect, the Procurement Policy Unit (PPU) hosted training sessions on a regular basis for public entities at the Ministry of Finance Head office during 2017 and 2018. In addition, intensive training was also conducted in all 14 regions each year. During the three years of existence, the PPU offered trainings to:

- Accounting Officers
- Public officials appointed under the internal procurement structures
- Members of the user departments

Table: Number of officials and bidders trained

In addition, during 2019/20, the PPU held fifteen (15) training sessions internally aimed at capacitating staff on various subjects pertaining to public procurement in Namibia.

During 2018, the PPU engaged institutions of higher learning with the aim to develop a curriculum for studies in public procurement. High institutions involved in this collaboration are; University of Namibia (UNAM), University of Science

and Technology (NUST) and Namibia Institute of Public Administration and Management (NIPAM). A memorandum of understanding between the PPU and the above institutions is expected to be signed during the 2020/21 financial year.

This collaboration is aimed to culminate in curriculum studies development and provision of accredited qualifying training at certificate, diplomas, and bachelor degree and honour degree level in the field of public procurement, by the year 2020. The development of qualifying training in public procurement is an importance step in the process of professionalization and creation of a development path for procurement practitioners and procurement cadres in Namibia.

Recommendation(s): This action will be included in the new Strategy. Internal and External Auditors should be included in the trainings. Action 2.6.2 to be revised to *“Training courses in public procurement for public entities (including internal auditors), the Office of the Auditor General and private audit firms”*

Additional Action *Capacity development of the PPU staff will continue to take through unaccredited short courses, professional courses and internal capacity development.”*

Additional Action – *“Development of unaccredited and accredited training courses and delivery thereof, by institutions of higher learning.”*

Action 2.6.3: *Require of business enterprises who wish to tender for public procurement contracts to demonstrate that they have internal anti-corruption policies in place*

The Ministry reported that 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. These two sections were extensively emphasised during the training for bidders.

Furthermore, instructions to bidders includes a section on Fraud and Corruption, and on conflict of interest which stipulates the acts considered as corrupt practices, conditions of conflict of interest and hence grounds for disqualification and ineligibility to partake in the bidding process. Bidders are also required in the bid submission form to declare “No conflict of interest” in accordance with the definitions provided under instructions to bidders.

Recommendation(s): Against the above background, this action should not be included in the new Strategy. It is the responsibility of the public entities and the Board to observe the conduct of the bidders and initiate the necessary measures against transgressors.

New Action to read: The implementation of E-Government Procurement should be prioritized to enhance efficiency and transparency in public procurement.

Action 2.6.4: *In line with Specific Objective 2.2 and in order to ensure public transparency in the awarding of tenders deliberations by the Procurement Policy Unit the Central Procurement Board of Namibia the Bid Evaluation Committees and an Independent Review Panel as well as details on bids and awards will readily be made publicly accessible*

In terms of section 55(8) of Procurement act 2015 public entities are required to publish notice of every procurement or disposal award together with the executive summary of the bid evaluation report. It is generally observed that public entities are not complying with this requirement with exception of a few public entities and the Board as there are rarely notifications published in the newspapers or websites. Through implementation of E-Government procurement, procurement data and information including procurement plans, implementation reports, procurement award notifications and executive summaries will be published on a single portal thus enhancing transparency through availability of procurement information to the public.

Recommendation(s): This action to be included in the new Strategy and should be rephrased to read : **Action 2.6.4:** *In order to ensure transparency in the procurement system, information on procurement plans, procurement implementation reports, contract awards will readily be made publicly accessible*

Specific Objective 2.7: Enhancing transparency and accountability in budget management

<p>Action 2.7.1 <i>Reduce diversion of resources into non-budgetary accounts</i></p>

During the 2017/18 financial year, the MOF reported that the Treasury guided O/M/As on a quarterly basis on how to manage and close the Ministerial funds in commercial bank accounts. The Treasury had put a moratorium on opening new Ministerial bank accounts in the commercial banks in 2014. In order to enhance budget transparency, MOF reported that budget execution reports are available but limited to O/M/As level on IFMS daily and at end of the financial year in the form of accountability reports.

In 2018/19, the Ministry of Finance reported that audits regarding anti-corruption policies were concluded and official letters with summarized audit findings and recommendations were issued to Accounting Officers of respective entities.

A directive was issued during May 2018 to all O/M/As to provide quarterly accountability reports on all statutory fund bank accounts. An effort was made to enhance accountability and transparency of statutory fund bank accounts, with the assistance of the consultant funded by the European Union (EU). A consultative meeting with Financial Advisors from four ministries namely; Ministry of Higher Education, Training and Innovation, Ministry of Veterans Affairs, Ministry of Education, Arts and Culture and Ministry of Works and Transport was held to discuss and understand how best they could manage funds in their ministries. A Treasury Circular No.2 of 2018 was issued to all O/M/As an instruction to submit quarterly accountability reports.

Furthermore, the Ministry of Finance reported that the Division Financial Management met with five (5) government ministries. These include the Ministry of Gender Equality and Child Welfare, Ministry of Health and social services, Ministry of Mines and Energy, Ministry of Home Affairs and Immigration and the Ministry of Education, Arts and Culture to discuss the management of the state bank accounts by O/M/As.

Audit reports for thirty-five (35) O/M/As were analyzed. The analysis was carried in order to determine the effectiveness of the system (Qualified Auditor General Opinion). Eighteen (18) O/M/As had unqualified audit opinion cases identified. For qualified audit opinion training was offered to assist these institutions in improving on their account reconciliation. The training circular was given to all O/M/As. The Office of the Auditor-General tabled 119 external audited reports in

Parliament and National Council and were made public on the Office's website.

During 2019/20, MOF shared some highlights on how Treasury has successfully submitted the bank account consolidated financial statement for 2018/2019 to the Office of the Auditor-General as per the requirements – (Circular D6/2018 of the Office of the Auditor-General).

MOF reported that the Division of Financial Management met with five (5) O/M/As; namely; the Ministry of Gender Equality and Social Welfare, Ministry of Health and Social Services, Ministry of Mines and Energy, Ministry Education, Arts and Culture as well as the Ministry of Home Affairs and Immigration during March 2019 on the subject of management of state bank account, bank account with lapsed Treasury Authority and that all bank accounts that were deemed not necessary to be closed in order to avoid the idling of the appropriate funds in such ministerial bank accounts. It was stated that the state borrows funds from elsewhere to fund its budgetary commitments.

The same meeting resolved that O/M/As should transfer closing balances to the state Revenue Fund at the end of each financial year as stipulated in section 7 of the State Finance Act, Act no 31 of 1991. This requires that the appropriate funds should be spent within the same year of appropriation and to avoid the rolling over of funds from one financial year to another.

In support of the above, a directive was issued to all O/M/As to update respective ministerial bank account records, reconcile and submitting them at Treasury Division. The information submitted is incorporated into the annual Financial Statements for Auditor-General audit purpose.

Meanwhile, the Ministry reported that it is faced with the challenge of non-adherence to Treasury directives by some O/M/As to transfer credit balances to the State Account.

Recommendation (s): This action to be included in the new Strategy.

Action 2.7.2: <i>Strengthening of parliamentary and public oversight through and follow up action on findings</i>
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Audit reports for thirty-five (35) O/M/As were analysed. The analysis was carried in order to determine the effectiveness of the system (Qualified Auditor General Opinion). For the financial year past four years the audit opinion were recorded as follows; 2015/16, 23 O/M/As unqualified out of the 32, 2016/2017 23 O/M/As unqualified out of the 35, 2017/2018 32 O/M/As unqualified out of the 35 and for the 2018/19 O/M/As unqualified out of the 31. With regard to the financial year 2017/18 and 2018/19 the government was audited on financial and compliance. With the Financial audit three O/M/As qualified for 2017/18 and for the financial year 2018/19 one qualified, one disclaimed. And for the Compliance audit two O/M/As for 2017/18 and four for 2018/19.

The training circular was given to all O/M/As. Training was focusing to reduce the qualified audit opinion, training and coaching offered to assist these institutions in improving on their account reconciliation, it was focused on the basis for the qualified opinions, suspense accounts as well as the importance of the adherence to the rules & regulations, providing supporting documents with regards to the annual statements. The Office of the Auditor-General tabled 119 external audited reports in Parliament and National Council and were made public on the Office's website.

Recommendation(s): This action should be included in the new Strategy. Parliament should develop punitive measures to take Accounting Officers to task.

During and after audit findings with fraud and corruption nature are forwarded to the Police and ACC, however, ACC takes very long to give feedback either they do not have capacity.

There is also a need for strong collaboration with Auditor-General Office to ensure prevention especially Compliance Audit and Performance Audit and IS Audit.

Action 2.7.3: *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*

No training on budget was provided to the Parliamentary Public Accounts Committee during the period under review, as there was no expressed need. However, Annual Budget briefings for the members of Parliament were conducted by MoF immediately after the tabling of the Annual Appropriation Bill and accompanying budget documents.

Recommendation(s): Regular training should be provided to the PAC by OAG and Anti-corruption Commission.

Action 2.7.4: *Complementing internal audits with independent external audits*

During 2017/18, the Office of the Auditor-General reported that they have incorporated all their actions in their annual plan 2018/2019 and are working on implementing the strategy.

The Office of the Auditor-General (OAG) has completed and tabled 124 Audits during the 2017/2018 financial year under

review. At least 11-Village Councils, 23-Town Councils, 15-Regional Councils, 22-Statutory Bodies, 8-Statutory Funds 11-Municipalities, and 37-O/M/As during the year under review. The Office also tabled 7-Performance Audit Reports on Provision of Health Services, Trophy Hunting, Monitoring Pollution, Management and Administration of Labour, Medical Waste Management, Delay in Remuneration for Teachers and Electricity Generation.

The Office of the Auditor General also issued one special report on Non-Submission of Financial Statements.

The Office of the Auditor-General (OAG) reported that the Office has completed and tabled 141 Audits during the **2018/2019** financial year.

At least 14-Village Councils, 26-Town Councils, 15-Regional Councils, 20-Statutory Bodies, 9-Statutory Fund, 13-Municipality and 35-O/M/As during the year under review. The Office also tabled 8-Performance Audit Reports on Sewerage Infrastructure, Costal Management, Disaster Preparedness, Gender Based Violence, Management and Administration of food, implementation of Child, Parental Maintenance, Delays in Business Process and Procurement Cycle.

The Office of the Auditor General also issued one special report on Non-Submission of Financial Statements.

In 2019-2020, the Office of the Auditor-General pointed out that the Office has completed and tabled 107 Audits during the 2019/20 financial year. At least 16-Village Council, 15-Town Councils, 7-Regional Councils, 14-Statutory Bodies, 4 Statutory Funds, 12- Municipalities and 36-O/M/As. The Office also tabled 2-Performance Audit reports on Criminal Assets Recovery and Provision of Maternal Health.

Furthermore, the Office of the Auditor-General works closely with the Public Accounts Committee (PAC) on the Tabled Reports and assisted the PAC to review reports and to conduct public hearings which were aired on the national television (NBC).

Recommendation(s): This action should be included in the new Strategy.

Action 2.7.5: Enhance budget transparency by: In year reports to improve the amount of accessible information available on the budget; · Strengthening auditing of public institutions and ensuring that audit reports are produced on time

The Ministry of Finance reported that the budgetary executions were made accessible on the ministerial website. The website is accessible by all O/M/As and the public at large.

Various activities were undertaken during the period under review in an effort to strengthening internal audit function of public institutions, including the approval of the Public Sector Internal Audit Policy by Cabinet, the appointment of Audit Committees for various OMAS, the training of internal Audit Auditors and meetings with respective Executive Directors on the internal Audit Policy, as well as the establishment of Government internal Audit Directorate within the MoF structure in order to provide guidelines and operational manuals pertaining the audit function.

Internal Audit activities for OMAS are ongoing.

Recommendation(s): This action should be included in the new Strategy, but be split between the two implementing institutions (MoF and OAG) as the external audit function remains the responsibility of the Auditor General.

Specific Objective 2.8: Ensuring decentralisation with accountability

Action 2.8.1: Conduct an analysis at RCs and LAs of corruption prone organisational policy gaps and develop internal integrity systems

During the period under review, ACC conducted Corruption Risk Assessments at all 14 Regional Councils namely; Oshikoto, Ohangwena, Otjozondjupa, Kunene, Omaheke, Oshana, Omusati, Kavango East, Kavango West, Zambezi, Khomas, Karas, Erongo and Hardap. In addition, CRAs were also conducted at Local Authorities. These include Gobabis Municipality, Otjiwarongo Municipality, Henties Bay Municipality, Oshakati Town Council, Oshikuku Tocun Council, Walvis Bay Municipality and Khorixas.

Recommendation(s): This action should be included in the new Strategy. However, the Commission should be resourced and well capacitated.

Action 2.8.2: Annual ethics training for RCs and LAs councillors and staff

During the period under review, ethics training was conducted at various Regional Councils and LAs, namely, Otjozondjupa, Kunene, Omaheke and Oshana Kavango West, Kavango East, Hardap and Kunene Regional Councils as well as Henties Bay Municipality and Khorixas.

In addition, during 2019, Integrity Committee members from thirteen (13) Regional Councils were trained on ethics.

Recommendation(s): This action should be included in the new Strategy as it is under the mandate of the institution.

Action 2.8.3: Ensure RCs and LAs capacity in financial management and auditing

During 2017/18, the Office of the Auditor-General reported that it did not formally commence the training process for RCs and LAs. However, audits have been conducted, and recommendations were provided to RCs and LAs to improve their Public Finance processes and systems.

Again during 2019/20, the OAG reported that no capacity building was conducted to RCs and LAs on financial management and auditing due to financial constraints. However, some officials from the Office attended a Mayors' Forum from the 2nd to 3 July 2019.

Recommendation(s): The activity should be carried to the new strategy, given that very little was done to implement it. The LAs and RC require training in areas of financial management.

Action 2.8.4: Organising periodical consultations and public debates for promoting the best anti-corruption practices within local and regional authorities and increasing citizens' confidence

The ACC held a debate for politicians in Oshakati. Moreover, ACC reported that it used social media platforms, such as Facebook, Twitter, and Instagram, to engage the public on ethical conduct and corruption awareness.

Recommendation(s): The action should be included in the new Strategy. However, the Commission should be resourced and well capacitated.

Specific Objective 2.9: Ensuring financial and asset disclosure for public officials

Action 2.9.1: Conduct wide consultations with stakeholders to design a standardised system of financial and asset management including a disclosure form to be used throughout O/M/As PEs/RCs and LAs; A plan for the gradual phasing in of a financial and asset

declaration system will also be designed. The relevant regulatory frameworks will be amended accordingly to make provision for the annual declaration of assets by public officials

All through 2017/18, OPM reported that the amendment to regulations 11 of the regulations made under the Public Service Act, 1995 was approved by the Prime Minister. The amendment was aimed at the declaration of whether a staff member has any private interests or is involved in any form of remunerative work outside his/her employment in the Public Service. The amendment signifies that declaration of interest is now compulsory for all public officials. This declaration was only for declaration of interest, not the declaration of assets. The declaration of interest by staff members in the Public Service was currently being made via a manual paper-based system. The option for an electronic declaration was underway.

During 2018/19 the declaration of interest by staff members in the Public Service (under OPM) was facilitated via a manual paper-based system. A request had been directed to the UN for technical experts to assist OPM with the development of a standardized system for the declaration of interest in the Public Service of Namibia. In the interim, the facilitation of getting the declaration of interest is ongoing; O/M/As was requested via Public Service Management Circular No. 9 of 2018 to submit the declaration forms and analysis reports to OPM, Department of Public Service Management (DPSM) before 30 June 2018. The preliminary report was finalized. Furthermore, an overall Public Service Report is being prepared for submission to the Secretary to Cabinet.

Recommendation(s): Minimal progress was made on this action. The problem of Regional Councils not adhering to declaration of Interest and Asset was discussed, but no solution was found.

Therefore 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 Local Authorities Act. The above-mentioned institutions were to find the best way to incorporate the declaration of Interest and Assets in RCs and LAs Act. Therefore, this action should be included in the new Strategy. OPM should speed up the process of manual migration to electronic system that was supposed to be done through the purchasing of the machine, hence manual processes proved to be unfertile and slow.

Action 2.9.2: Training and counselling on compliance and conflict of interest

It was reported in 2017/18 that OPM has created a new Division: Integrity Unit that will be responsible for addressing issues around the declaration of interest, as well as spearheading the creation of integrity committees in O/M/As and PEs. The recruitment of staff members to the Integrity Unit is underway. It should, however, be noted that the implementation of this Activity depends on the progress of Action 2.9.1.

Recommendation(s): This action should be included in the new Strategy, as this action had not yet been implemented.

Action 2.9.3: Submissions will be verified and violators investigated and acted against

In the course of 2017/18, the OPM and Attorney General worked on the amendment to the Public Service Act, 1995 to provide a legal basis on the declaration of assets. Currently, there is no law to enable OPM to collect asset disclosure information. Other issues

needed to be looked at such as (a) whether the declaration is considered private or public information, (b) the current declaration of interest is in paper form (no database). Hence it is laborious to analyse or track information, (c) state-owned enterprises and LAs are governed by legislation different from that of the O/M/As. The same should be noted that the implementation of this Activity depended on the progress of Action 2.9.1.

Recommendation(s): This action should be included in the new Strategy, as this action had not yet been implemented.

Strategic Objective 3- Strengthening efforts to deter corruption

Anti-corruption laws and strengthening the capacity of ACC are deemed effective means of the anti-corruption strategy. There were 17 NACS actions under this strategic objective. Out of the 17 actions, 16 actions were implemented. Of the 16 NACS actions, seven actions (3.1.4-ACC; 3.1.5, 3.2.6, 3.2.7, 3.2.8, 3.2.4, 3.2.9-MOJ; 3.3.1-OPM) were completed while one action (3.2.5-MOJ) was not implemented. Progress on this Strategic Objective is narrated below.

Specific Objective 3.1 Strengthening the Anti-Corruption Commission

Action 3.1.1: *Competent ACC staff are retained and where necessary recruited*

During the 2017/18 financial year, the ACC committed to ensuring that competent ACC staff are retained and, where necessary, recruited. In the period under review, ACC's staff component stood at 85 staff members, compared to 84 staff members in the previous financial year. There were also 16 vacant positions. To address the challenges related to hiring new staff, ACC worked with the Secretary to Cabinet, requesting to deviate from the normal hiring process and to have ten (10) positions filled. Funding has been secured to fill these ten vacancies. Five of the above were in the newly created Division Forensic Services.

ACC is implementing the Performance Management System with a view of improving the performance of staff.

Although the ACC had not retained staff, the institution undertook interventions to address the shortcomings. In the 2018/19 financial year, analysis of documents revealed that the ACC conducted a climate survey an organisational restructuring exercise in an effort to cater to changing needs. A draft organisational

structure was crafted for revision by the internal staff members. The said exercise was outsourced to the Namibia Institute of Public Administration Management (NIPAM) to develop a comprehensive proposal as to the desired structure.

In the 2019/2020 financial year, a report on the organisational restructuring was submitted to the ACC by NIPAM and presented to the staff members at the Head Office and regional offices. However, the process had not yet been completed.

Recommendation(s): This action remains and would be included in the next Strategy as it is not yet completed. However, the action should be amended to read as follows: *Recruit and retain Competent ACC staff*, with indicators remaining as is but adding staff retention policy.

Action 3.1.2: *Strengthen ACC's effectiveness as a preventative anti-corruption body through sufficient resources to enable the ACC to strengthen its investigation, prevention, educational and research capacity*

Action: 3.1.3: *Strengthen ACC's capacity to increase its campaigns on the dissemination of information on the prevention of corruption*

In terms of strengthening ACC's capacity to increase its campaigns on the dissemination of information on the prevention of corruption, during the of 2017/18 financial year, the Public Education and Corruption Prevention Directorate developed a Communication Strategy to enable staff to tailor messages and medium for different target groups. The Directorate also developed an Anti-Corruption Awareness and Ethics Guide as a standard tool for educating integrity committees in all O/M/As, RCs and LAs.

During the 2018/19 financial year, ACC received a three per cent increased budget allocation for the 2018//2019 financial year. The Anti-Corruption Commission received N\$61 million (Calle Schlettwein, 2018). This enabled ACC to establish the Division Forensic Services consisting of five investigating officers dedicated to acquire a filter and analyse data from electronic devices. ACC had also engaged experts in specialized fields to invest in modern software analysis programmes, and train investigating officers on modern investigative techniques.

Besides, the Public Education and Corruption Prevention Directorate also developed a Corruption Risk Assessment Guide to be used in corruption risk assessment of various institutions.

During 2019/20, the Anti-Corruption Commission received N\$61.6 million, 1.4 per cent more than the previous year to support activities to fight against corruption (Calle Schlettwein, 2019). As such, ACC strengthened its effectiveness as a preventative anti-corruption body through sufficient resources to enable it to strengthen its investigation, prevention, education and research capacity.

Recommendation(s): This action forms part of ACC's mandate, and it should be included in the new Strategy. With additional element to read as follows:

'Strengthen ACC's financial capacity to enable it to effectively carry out its mandate.'

Action 3.1.4: *The capacity of the ACC will be strengthened through extensive joint training of investigators and prosecutors*

In 2018/19, the capacity of the ACC was strengthened through extensive joint training of investigators and prosecutors which took place on 25-29 March 2019. The workshop aimed at developing a

Reference Guide for Investigators and Prosecutors.

Recommendation(s): This action should be included in the new Strategy to cater to emerging trends and needs. It can also present new opportunities for joint capacity building efforts.

Action 3.1.5: *Conduct a study to ascertain what the delays are in implementing justice in corruption cases the reasons for the delays and recommendations to eliminate unnecessary delays*

In 2017/18, the MOJ and Judiciary completed a study to ascertain delays in implementing justice in corruption cases, the reasons for the delays and recommendations to eliminate unnecessary delays. A workshop was held on 9-11 February 2018 to identify challenges that can be addressed by the Task Force. The following three working committees were created by the group: (a) Business Process Re-engineering; (b) Finance committee; and (c) Legislative committee to deal with laws that need to be amended. Initiatives are underway for reform in the criminal justice sector. The Office of the Prosecutor-General has been relocated to accommodate operations of the Anti-Corruption Unit.

Again during 2018/19, the expected output for Action 3.1.5 was achieved. The study was completed and published. In addition, a Criminal Justice Sector Reform Task Force was created and led by the Deputy Chief Justice in order to address the recommendations to eliminate delays. There have been a number of reports presented in the studies done (approximately 23). Parties mentioned in the recommendations include the ACC, National Forensic Science Institute of Namibia (NFSI), Public Prosecutors, Office of the Prosecutor-General, Directorate of

Legal Aid, and Magistrates. Initiatives were underway for reform in the criminal justice sector as a whole. The Office of the Prosecutor General was relocated to enhance operations of the Anti-Corruption Unit. This activity was achieved in record time.

Recommendation(s): There is a need to ascertain the effectiveness of the task force to improve the system and address shortcomings. It is therefore recommended that the action be (amended and specific for each institution) carried to the new Strategy to monitor progress made and account for executed recommendations from the study.

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 a public international organisation as a criminal offence

Action 3.2.3: Amend the Anti-Corruption Act, 2003 to include embezzlement by a person in the private sector as a corrupt practice

In 2017/18, ACC was tasked with amending 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, as well as to include embezzlement by a person in the private sector as a corrupt practice. ACC drafted a policy document indicating the provisions of the Act that should be considered for amendment. ACC was scheduled to release documents for discussion and review of the Act by March 31, 2018. However, the release was delayed. The proposed corruption legislation was planned to be tabled in Parliament during the 2018-2019 financial year.

Again in 2018/19, the ACC drafted an amendment Bill, catering for matters indicated in a Cabinet resolution as well as other necessary and urgent amendments. While during 2019/20 financial year, ACC revised and consolidated its recommendations in respect of the sections of the Anti-Corruption Act, 2003 to be reviewed. ACC has also considered the recommendations of the UNODC Country Report that was prepared after the Namibia Country Review was conducted. The national consultative meeting was scheduled to take place in November 2019. However, it did not take place. This action has not been completed.

Recommendation(s): The action should be included in the next Strategy as it was not completed. The completion of the action should also be time bound (by 2022), and responsible institutions to be clearly stated within specific timelines.

However, it was also recommended that ACC, during the amendment, to consider provision for appointment of oversight Commissioners as well as re-visit the power of the ACC Director-General for transparency.

Action 3.2.2: Combat illicit enrichment inclusive of enabling tax authorities to conduct lifestyle audits

For the duration of 2017/18 MOF reported that the MOF's Inland Revenue established the Transfer Pricing Unit to curb illicit financial inflows/outflows. The ministry also conducted Life Style Audit, a critical tool to curb illicit enrichments, applied in collaboration with third parties, to curb tax evasions and tax avoidance schemes.

A stakeholders Ministerial Committee meeting was held on 27 October 2017 with BIPA, FIC, NCIS, MITSMED, MOHA, and MET on Wildlife Protection and Law

Enforcement concerning both domestic and foreign investors operating in Namibia. The purpose was to bring stakeholders together to discuss the loopholes in the country that leads to revenue loss through tax evasion schemes and illicit cash flow activities. The Ministry of Finance carries out field operations aimed at discouraging tax avoidance schemes as well as to curb tax evasions as outlined below:

- A feasibility study on Presumptive Tax was conducted to explore the possibility of taxing micro businesses, however it was found not feasible;
- Layman Draft Bills on VAT and Income Tax Acts to prevent tax avoidance and tax evasion schemes was done, as well as taxing of other income. The processes of the layman draft Bill is to be carried out over to the next term.
- Tax policy on these amendments was presented to the Minister for submission to the Cabinet;
- The Double Taxation Agreements Renegotiating Task Team was established in September 2017, consisting of six members appointed by the Minister to renegotiate the existing double taxation agreements in line with the Namibian Double Taxation Agreement Policy. The Double Taxation Policy was designed with the purpose to eliminate opportunities for international tax evasion and incorporate standard on BEPS.

In addition, the MOF-

- Established a Division Security and Risk Management and a Tax Intelligence Investigation Unit to conduct regular inspections and investigations to reduce corruption;

- Inland Revenue has collaborated with other law enforcement to carry out the Joint Operations for purpose of tax compliance Enforcement during November 2017. The parties providing support in the tax enforcement field operation are FIC, NAMPOL, FIC , BON Exchange Control;
- The Integrated Tax Administrative System (ITAS) aimed to bring efficiency in tax administration and improvement of revenue collection was put in place.

In the course of 2018/19, Namibia was one of the 17 countries and territories that were blacklisted by the European Union (EU). The EU had called on countries with non-transparent tax regimes and structures solely designed to shield companies profit from tax to reform their systems. Namibia is not a tax haven as referred to by the EU. However, Namibia is exposed to the illicit outflow of cash. Given the above, Inland Revenue established the Transfer Pricing Unit in order to curb illicit financial inflows/outflows; Life Style Audit, a critical tool to curb illicit enrichments is applied in collaboration with third parties to curb tax evasions and tax avoidance schemes.

During the NACS period 2016 – 2019 Thirty (31) lifestyle audits cases were embarked upon under the forensic audit division in the Inland Revenue Department resulted in tax assessment raised and tax collected. A feasibility study on Presumptive Tax was conducted to explore the possibility of taxing micro and small business, however was not adopted.

During the 2016/2017, the Directorate of Customs and Excise conducted World Customs Organisation (WCO) Operation named "CHIMERA". The operation aimed to improve operational cooperation to prevent the illicit trafficking of Small Arms and Light Weapons (SALW), and to identify intelligence gaps and provide data to

better assess the threat within environment of terrorism.

During 2017/2018, a total number of 30 Customs officials were trained by the International Intellectual Property Crime Investigator College (IIPCIC) INTERPOL which is a fully interactive on-line IP crime training facility to benefit law enforcement, regulatory authorities and private sector IP crime investigators. The College's main objective is to deliver leading edge training to equip investigators with the necessary skills to effectively combat current and emerging threats from IP crime. The Directorate further conducted the following operations:

SACU Operation TopLiq, Operation ODYSSEUS; WCO Operation "ACIM 2" and Operation "X" Zambezi Region with the special focuses on the fight against illicit trade.

During 2019/2020, the Directorate of Customs and Excise conducted a Risk Management Awareness programme on combatting wildlife crime in Namibia in collaboration with Ministry of Environment and Tourism and the Namibian Police Protection Resources Department), were a total of 120 officers were trained throughout the country.

Drafting of Layman Bills on VAT and Income Tax Acts to prevent tax avoidance / tax evasion schemes were done. Tax policy on these amendments was presented to the Minister for submission to the Cabinet. The Double Taxation Agreements Renegotiating Task Team was established in September 2017, consisting of six (6) members appointed by the Minister of Finance to renegotiate the existing double taxation agreements in line with the Namibian Double Taxation Agreement Policy.

The Double Taxation Agreement was concluded in the 1990s and have not kept up with the commercial development. In addition, MOF had established a Division Security and Risk Management and a Tax Intelligence Investigation Unit to conduct regular inspections and investigations to reduce corruption. The Joint Operation such as Tax Enforcement on Asian Nationals, which was issued in November 2017 and Joint Operation request letters which were sent to FIC, NAMPOL and BON Exchange Control. Integrated Tax Administrative System (ITAS) was launched to bring efficiency in tax administration and improvement of revenue collection. Inland Revenue Department- Legal Unit undertook consultations with various companies in the mining sector, where stakeholders concerns were accommodated in the proposed 2018/2019 tax amendments. The Department Inland Revenue-Transfer Pricing Unit finalized the two illicit financial flow-related audits.

The Directorate of Customs continued consultations with the Namibian Police during the year whereby a criminal case was opened against the counterfeit whiskey importer.

Inland Revenue Department through the joint operation "Sunrise Operation" brought 346 taxpayers in the taxpayer population at the end of the financial year 2017/2018. Additionally, the department Inland Revenue has achieved the implementation of the new system aimed to bring improvements in the tax administration. The department Inland Revenue gained cooperation from four commercial banks

In 2019/20, MOF included additional tax policy proposals in the Draft Bills aimed at strengthening the tax laws and optimise revenue collection. The proposal Bills will be submitted to Cabinet for approval once the tax policy proposals are finalised.

MOF also reported that they collected over N\$ 1 million from penalties issued to importers on unlicensed good such as smuggling of diamonds during November/ December 2019.

The Directorate of Customs & Excise to implement the container programme, which is the joint operation with the Ministry of Environment and Tourism, NAMPOL, NAMPORT, aimed at identifying high-risk shipment during import/export transshipment. UNODC and WCO funded the project. Furthermore, Customs and Excise Directorate implemented an electronic data interface and sought treasury authorisation for disposing of confiscated goods.

Inland Revenue through the joint operation 'Sunrise Operation' has brought 345 taxpayers into the tax population.

Recommendation(s): This action should be included in the new Strategy as it forms part of their mandate, with emphasis on LEAs coordination.

Action 3.2.4: 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

All through 2017/18, the Act was amended on section 158A and repealed on section 185 of the Criminal Procedure Act, 1977, to effectively cater for protection of witnesses.

Again in 2018/19, the report from the Ministry of Justice (MOJ) indicated that they embarked upon the procurement process to engage consultants to work with Law Reform Directorate on the overhaul of the Criminal Procedure Act (CPA) (Act No. 52 of 1977). The CPA of 2004 was repealed in December 2018 in lieu of the overhaul.

Recommendation(s): This action should be included in the new Strategy as it was not achieved.

Action 3.2.5: 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

In 2019/20, the process of amending the Prevention of Organised Crime Act (Act No. 29 of 2004) could not start due to competing priorities that are lined up for this current year. The process will only start in the 2020/21 financial year.

Action 3.2.6: Develop legislation on witness protection and whistle-blower protection

Recommendation(s): It is recommended that the action remains and be included in the new Strategy because it was not implemented.

In the course of 2017/18, specifically on the 6 October 2017, the Whistle-blower Protection Act 10 of 2017 and Witness Protection Act 11 of 2017 were signed by the President. Though the Acts were passed by Parliament, they have not yet been brought into force. They will come into force on a date set by the Minister in the Government Gazette. The enactment affirms Namibia's commitment to the UN Convention against Corruption (UNCAC). More specifically, the following:

The Whistle-blower Protection Act 10 of 2017

- Establishes a Whistleblower Office, which will be responsible for investigating disclosures made by whistle-blowers as well as a complaint of retaliation;
- Creates a Whistleblower Protection Advisory Committee, which brings together individuals from different areas of the government and tasks them with the advising the Prime Minister on policy relating to whistle-blowers;
- Lays out specific protections for whistle-blowers;
- Outlaws employment contracts with language that bans or discourages employees from speaking out.

The Witness Protection Act 11 of 2017-

- Establishes a Witness Protection Unit to protect and assist witnesses and related persons;
- Establishes a Witness Protection Advisory Committee;
- Establishes a Witness Protection Programme and for admission of witnesses and related persons to the Programme;
- Provides for measures or action to be taken to protect witnesses and related persons;
- Establishes a Witness Protection Review Tribunal to review certain decisions;
- Authorises to enter into national and international agreements on witness protection;
- Creates offences in relation to witness protection;
- Amends section 158A and repeals section 185 of the Criminal

Procedure Act, 1977, to effectively cater for protection of witnesses.

Recommendation(s): Although this action has been completed, once resources are made available, recommended for roll-out and implementation. Moving forward, the monitoring and implementation of the legislation should be included in the new Strategy.

Action 3.2.7: *Develop legislation on public procurement to make provision for a register of business entities and individuals who are barred from undertaking government-related work due to previous irregularities and dishonesty or corruption convictions*

Legislation on public procurement was enacted and currently in force.

Recommendation(s): The new strategy should focus on the monitoring of the implementation of the Public Procurement Act in relation in relation with the register.

Action: 3.2.8: *Review and amend Namibia's Extradition Act to simplify extradition procedures to ensure that Namibia does not become a haven for fugitives*

During the period under review, MOJ reviewed and amended the Extradition Act, 1996 to simplify extradition procedures to ensure that Namibia does not become a haven for fugitives. The Extradition Act (Act No. 11 of 1996) has been amended by the Extradition Amendment Act, Act No. 19 of 2018 on 31 December 2018. This Amendment Act has become operational on 29 September 2020 as determined by the Minister of Justice by Government Notice No 251 in the Government Gazette No. 7361 of 15 October 2020.

Recommendation(s): The action was completed and thus should not be included by the new strategy.

Action 3.2.9: *Develop legislation enabling mutual legal assistance to be afforded to other states in terms of identifying, freezing and tracing proceeds of crime and the recovery of assets. The legislation would also make provision for a mechanism to enable the effective organisation of joint investigations involving other state parties*

During the period under review, MOJ developed enabling mutual legal assistance to be afforded to other states in terms of identifying, freezing and tracing proceeds of crime and the recovery of assets.

This action has been completed as the International Cooperation in Criminal Matters Act (Act No. 9 of 2000) has been amended by the International Cooperation in Criminal Matters Amendment Act, Act No. 20 of 2018. The Amendment Act became operational on 31 December 2018.

Recommendation(s): The action was completed and thus should not be included by the new strategy.

Action 3.2.10: *Develop and enact an Audit Bill to ensure Auditor General reports are followed by rectified accounts and actions to hold officials accountable*

OAG assisted the Parliament of the Republic of Namibia to conduct one public hearing. The public hearing was aired on Namibia Broadcasting Corporation media platforms, as a result reaching the entire nation. In addition, OAG reported that the drafting of the Audit Bill had been finalised and the Bill was sent to the Ministry of Finance to be aligned to the Public Finance Bill.

Recommendation(s): The law is not yet amended, and therefore the action should be included in the new Strategy.

However, accountability of officials on this function, will enforced by relevant committees of Parliament. So the action should be rephrased to read as follows: "Develop and enact an Audit Bill to ensure Auditor General Reports are followed by rectified accounts."

Specific Objective 3.3: Addressing public institutions' specific vulnerabilities

Action 3.3.1: *The Public Service Staff Rules will be amended to extend the definition of "major offences" to include corrupt practices as contemplated in Chapter 4 of the Anti-Corruption Act, 2003*

During the period under review, OPM 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 inclusion of corrupt practices in the PSSR would lessen the work of investigators as the Public Service Staff Rules will cover the disciplinary mechanism for public service employees. The PSSR was finalised by the Public Service Commission and is operational in 2019.

Recommendation(s): To monitor implementation and application, the action should be included in the new Strategy.

Action 3.3.2: *Review progress made on preventing the laundering of the proceeds of crime*

The Financial Intelligence Centre (FIC), as part of its mandate, provides actionable intelligence to law enforcement agencies to identify predicate offences related money laundering (ML), proceeds of crime, the offence of ML, the financing of terrorism, and proliferation. A total of 285 spontaneous disclosures and responses to law enforcement were disclosed in 2017-2018.

The FIC continued to make progress in preventing the laundering of the proceeds of crime through the following measures:

- FIC issued three (3) guidance notes to accountable institutions on De-risking, mitigation of cross border remittance risks related to import and another on the 15-day reporting period of suspicious transaction reports and suspicious activity reports.
- FIC conducted 81 off-site compliance assessments and 71 on-site assessments on certain accountable and reporting institutions to ensure compliance against the amended Financial Intelligence Act 2012 and its regulations.

Again in 2018/19, FIC, as part of its mandate, provided actionable intelligence to law enforcement agencies in order to identify predicate offences related to Money Laundering (ML), proceeds of crime, the offence of ML, the financing of terrorism, and proliferation. The total number of 338 disclosures were made by FIC in the 2018/2019 financial year.

All through 2019/20, FIC again reported that they made 344 spontaneous disclosures and responds to requests for information from other institutions and issued forty four (44) intervention orders amounting to about NAD34 million. The bulk of statistics reproduced comprised disclosures and responses to the request for information relating to lifestyle profiling, which helps identify money laundering, tax evasion, corruption and fraud. Law enforcement agencies that the FIC shares financial intelligence include as the Namibian Police, ACC, MOF- Departments of Inland Revenue and Custom & Excise, and Office of the Prosecutor General. FIC further reported that their intelligence to the preservation and/or forfeiture of

proceeds of crime in terms of the Prevention of Organized Crime Act, 2008.

Recommendation(s): The action should be included in the new Strategy to monitor and assess its operationalization and how it is being implemented. It is also part of the mandate.

Moreover, it is suggested that a specific objective that aims to find sustainable solutions addressing delays of legislations amendments (delays justice and keep abreast with changes in environment) be considered for inclusion in the new Anti-corruption Strategy. Additionally, there is a need to improve efficiencies and effectiveness relating to amendment of legislations.

On the harmonization of legislation, there should be an Action Plan dedicated to Identifying pieces of legislations requiring harmonization to close existing loopholes.

It was also recommended that the Office of the Prosecutor General and NAMPOL (AML/CFT Division) should become part of the cluster and report on ML civil, criminal investigations and convictions in the next strategy.

Summary of progress made on Strategic Objective 3

- ACC structure was reviewed to cater to the current needs to strengthen its effectiveness as a preventative Anti-corruption body. A Forensic Services division was also created to filter and analyse data from electronic devices.
- ACC's capacity was strengthened through extensive joint training of investigators and prosecutors that took place in 2019.
- The Anti-Corruption Act, 2003 (Act No. 8 of 2003) was reviewed 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.
- Prevention of Organised Crime Act, 2004 (POCA) was amended to align it with the Anti-Corruption Act, 2003.
- More than twenty lifestyle audits were conducted, and a policy aimed at curbing tax planning opportunities and tax avoidance was developed.
- Audit bill was finalised and currently with the Ministry of Finance to align it to the Public Finance Bill.
- The Ministry of Finance established a Security and Risk Management Division and Tax Intelligence Investigation Unit to conduct regular inspections and to reduce corruption.
- The Public Service Staff Rules were amended to extend the definition of major offence to include corrupt practices as stipulated in the Anti-corruption Act, 2003.
- FIC conducted off-site and on-site compliance assessments on certain accountable and reporting institutions to ensure compliance against the amended Financial Intelligence Act, 2012 and its regulations continues effort to prevent, detect and reporting of suspicious transactions and activity by conducting off-site and on-site compliance assessments on accountable and reporting institutions. This ensures FIA compliance against the amended Financial Intelligence Act, 2012 and its regulations. Further the FIC contributed to confiscation and forfeiture of assets generated from illicit activities through sharing of intelligence spontaneously and upon request by law enforcement agencies.

Strategic Objective 4-Conducting extensive anti-corruption education

The NACS embarked on a nation-wide civic education strategy on corruption to better inform Namibians through the implementation of activities under two specific objectives. There were seven (7) NACS actions under this Strategic Objective. All seven actions (4.1.1, 4.2.1, '4.2.2, 4.2.3, 4.2.4; 4.2.5 - ACC; 4.1.2- NIPAM); were implemented, of which two actions were completed.

Specific Objective 4.1: Developing an anti-corruption component of training curricula for personnel of public institutions

Action 4.1.1: *Ensuring the participation of public servants at periodical training courses on ethical and behavioural norms*

During the period under review, about 1000 public servants were trained on ethics and integrity from various institutions. These included Henties Bay Municipality, Ministry of Agriculture, Water and Forestry and Zambezi Regional Council. Furthermore, the ACC also conducted Ethics and Integrity training for the Namibian Police Force (NAMPOL) in the Khomas, Otjozondjupa, Oshana and Erongo regions. The training covered topics such as unethical conduct and corrupt conduct in public sector, confronting unethical and corrupt conduct and unethical and corrupt conduct mitigation models.

Moreover, ACC jointly with OPM facilitated an induction and training programme for members of the newly established Integrity Committees from various Offices/Ministries/Agencies (OMA's) and Regional Councils. The training was initiated with the objective(s) to capacitate Integrity Committee members to understand their roles as well as ensure compliance and reduce the risks of corruption in public institutions.

The training for OMAs took place at the ACC Headquarters in Windhoek from September 23 to October 23, 2019. The training for members of the Integrity Committee from the Regional Councils took place at Otjiwarongo (11-12 November 2019), Oshakati (14-15 November 2019) and Windhoek (19-20 November 2019).

Integrity Committees from 44 OMAs/13 Regional Councils attended the training. Despite the good attendance, a great number of staff members nominated to serve on the Integrity Committee were not trained. These include all Integrity Committee members of the 1) Ministry of Public Enterprises, 2) National Planning Commission, 3) National Assembly, and 4) //Karas Regional Council.

The two-day tailored training was conducted by the staff members from ACC and OPM. The OPM oriented the participants on the revised Public Service Staff Rule (PSSR E.X/II-) Code of Conduct, Integrity and Ethics. The ACC officials sensitised participants on corruption as well as concepts of ethics and integrity. The training further engaged participants on the functionalities of the Integrity Committees, exploring strategies that may aid the successful implementation and sustainability of Integrity Committees in various OMAs/Regional Councils.

Recommendation(s): The O/M/As should ensure that budget is allocated for the public servants to participate in the training courses on ethical and behavioural norms at NIPAM. The Integrity Committees should put in practice the lessons acquired during training to curb and close loopholes of corruption within their respective institutions. Overall, to ensure continuity of this action, it is recommended that it remains and be included in the new Strategy. In terms of centralized training budget, enough budgeting provision and allocation as well as coordination between institutions responsibilities for the implementation objective 4 and 6.

Action: 4.1.2: *Incorporating modules on integrity and ethics in formal management development programmes for the public service*

Throughout 2017/18 financial year, NIPAM developed flagship programmes (Foundation Programme, Supervisory Development Programme, Middle Management Development Programme, Senior Management Development Programme and Executive Development Programme). NIPAM conducted 30 functional courses for public service staff members during the 2017-2018 financial year, with 280 people participating. The functional courses incorporated modules on integrity and ethics as part of formal management development programmes. The number is only 2.4% of the 11,730 targets. The low demand for the training programmes and courses during the period was due to budgetary cuts by O/M/As and PEs. Training will be continued in the next financial year.

Again in 2019/20, NIPAM reported post integrating integrity and ethics topics in its programs and managed to train 384 public servants in areas that cover ethics and integrity during the year under review.

Recommendation(s): The O/M/As should ensure that budget is allocated for the public servants to participate in the training courses on ethical and behavioural norms at NIPAM. The Integrity Committees should put in practice the lessons acquired during training to curb and close loopholes of corruption within their respective institutions.

ACC to always identify lessons learned and loopholes of corruption within their respective institution. Centralized training budget: Enough budgeting provision and allocation as well as coordination between institutions responsible for the implementation objective 4 and 6.

Apart from NIPAM, there is a need for a close collaboration and coordination between institutions of higher learning for harmonize and standardise the courses on integrity and ethics. NIPAM should develop a stand-alone course on integrity and ethics.

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

Action: 4.2.1 *Organising anti-corruption public debates at national, regional and local levels*

During the 2017/18 financial year, ACC organized three successful public debates both at national, regional and local levels. More anti-corruption awareness at institutions of higher learning was carried out in support of AU's "Winning the Fight against Corruption" campaign.

On the 28 September 2017, the ACC in collaboration with students from University of Namibia (UNAM), Namibia University of Science & Technology (NUST) and International University of Management (IUM) held a public debate at University of Namibia, Gym hall. Deliberations

were on: the concept of corruption, the forms and effects of corruption, corruption in the education sector and the ways to reduce corruption and promote good governance in Namibia. Thirty Four (34) students from UNAM, NUST and IUM attended and participated on the debate.

During 2018/19, a national essay competition for secondary school learners in collaboration with the Ministry of Education, Arts and Culture was conducted. Although all the fourteen educational regions were invited to participate, only seven regions namely; Erongo (De Duine Secondary School, Duinesig High School and Kuisebmond High School); Khomas (Windhoek Gymnasium & Chairman Mao Zedong High School); Ohangwena (Engela Junior Secondary School); Omaheke (Nossob Combined School); Omusati (Simon Illeka Combined School, Negumbo Secondary School and Onawa Secondary School); Oshana (Kapembe Junior Secondary School, Oshekasheka Combined School & Ekwafo Secondary School); and //Kharas (P K De Villiers Secondary School & Oostenheim Combined School) took part in this event. Thirty seven (37) learners (21 for Grade 8-9 category and 16 for Grade 10-12 category) participated in the Essay competition. The Essay topic was "How can the Namibian society prepare learners to become citizens with integrity?" Six learners were awarded different prizes in two different categories, namely Grade 8-9 and Grade 10-12.

The ACC commemorated the Africa Anti-Corruption Day at UNAM, Oshakati Campus on 11 July 2019 with the theme of "Understanding the relevance and to instill integrity and ethics in political leadership". The event was organized in a form of a forum that was represented by various speakers from different spheres of society.

Among the speakers were the Director –General of ACC, Mr. Paulus K. Noa who presented Politics and the battle against corruption, Presiding Bishop at ELCIN in Namibia presented Relevance of integrity and ethics in political leadership: social justice, peace and political stability as preconditions of national building and economic prosperity. In addition, Dr. A. F. Kamanzi, a lecturer at UNAM Oshakati Campus presented "Dealing with corruption in African politics: building on guilt for good governance", while Mr. Job Amupanda, a leader of Affirmative Repositioning in Namibia presented the fight against corruption in Namibia: an appraisal of institutional environment and a consideration of a model for civil society participation.

The event also had five commentators who were tasked to analyze and comment on the speakers' presentations. The commentators were Mr. Paulus Lyambezi, Chief Public Education and Corruption Prevention Officer at ACC, Dr. Elijah Ngurare, Quality Assurance Coordinator at UNAM, Ven Canon Nangula E. Kathindi of Anglican Church in Namibia and Mr. Samson Ndeikwila, Executive Director for Forum for the Future (FFF). Hon. Vipuakuje Muharukua, a Member of Parliament for Popular Democratic Movement (PDM) also attended the event.

Again during 2019/20, ACC engaged the public on an anti-corruption discussion on various social media platforms such as Facebook and Twitter. Themes and topics such as Bribery, Reporting Corruption, Nepotism, General Corruption, Take a Pledge, Be part of the fight, Theme song, ACA Section 17(2), Kill corruption, Trash corruption and It begins with me, were discussed between 21 February 2019 and 9 October 2019.

Recommendation(s): ACC should continue engaging the public, especially the youth, on an anti-corruption discussion on various social media platforms such as Facebook and Twitter. The public debates should continue countrywide at national, regional and local levels. A robust approach should be applied to strengthen the relationship between stakeholders and the Anti-corruption Commission to fully educate the public about the evils and dangers of corruption. It is recommended that this action be included in the new Strategy to increase public awareness on the impact of corruption. It is also recommended that more debates should be organised involving learners at all levels in future. ACC should consider organising same debates for the Faith-Based Organisations and political arena as well as tertiary educational institutions.

Action 4.2.2: Introducing the anti-corruption theme in the civic life skills subject in schools

At inception of the NACS, ACC had introduced the anti-corruption theme in the civic life skills subject in schools. Approximately 200 Life Skills teachers were trained in all 14 Regions. ACC trained Life Skills teachers in all the fourteen regions on the implementation of the Manual in 2015, 2016 and 2017 respectively. The training was given to the Life Skills teachers who were giving Life Skills lessons at all schools in Namibia.

During the year 2018/2019, the ACC officials and National Institute of Educational Development (NIED) officials participated in the meeting discussion held in Okahandja in June 2018 which looked at how best ACC and NIED under that MoEAC can move forward on attaining NACS Strategic Objective 4. The meeting however, brought about the development of an action plan. During the same year, the questionnaire for monitoring and evaluation of the life skills teacher guide was also standardised.

In the course of 2019/2020, as part of the monitoring and evaluation of the implementation of the Educational Manual, a survey was conducted to establish whether the Life Skills teachers were implementing the Manual accordingly and whether there were teachers who may require training. Moreover, the survey informed ACC about the successes and challenges experienced by Life Skills teachers in using the manual.

A combined total number of 1182 questionnaires were sent to all the Life Skills teachers who were either trained or not trained. Out of 1182 questionnaires, only a total number of 509 were received which represent 43% of respondents. All the regions have at least sent their response to the survey, except Zambezi region which did not send any response on the questionnaires.

The table indicates the numbers of Teachers trained on the Manual and respondent rate per offices.

Offices	Number of respondents	No Responded received	Respondent %
Oshakati	564	389	69%
Otjiwarongo	289	38	13%
Swakopmund	90	60	67%
Windhoek	239	22	9%
Total	1182	509	43%

Many respondents have indicated that there are three topics such as Behavioral change, State Finance and properties and Silent corruption that need further clarification from ACC.

Recommendation(s): It is recommended that training for the new Life Skills teachers and the teachers were not trained should be given. In addition, the anti-corruption theme/subjects should be cross-cutting and incorporated in all subject areas. All teachers as civil servants need to be trained on anti-corruption civic education to transmit it to the learners. The action should be included in the new Strategy. This action will be time bound. ACC should continue engaging NIED for the mainstreaming of the Anti- Corruption theme/subject in the curriculum.

Action 4.2.3: *Implementing a training programme on ethics, integrity and anti-corruption for school teachers*

About 26 teachers (4 males and 22 females) at Donatus Primary School, a public school in the Otjozondjupa region were trained on issues of Ethics and Integrity on 18 June 2019. The school was chosen because it was not trained in the previous years.

Recommendation(s): ACC should continue training school teachers in Namibia on ethics, integrity and corruption. The action should be included in the new Strategy. Consider gender equality compliant. Both private and public schools should be targeted and included in the trainings. Strengthening ACC and NIED partnership on teacher training.

Action 4.2.4: *Development and implementation of an educational communication strategy through print, electronic, and social media to convey information on corruption and the risks and consequences of corruption.*

In 2017/18 financial year, ACC commenced with the process to develop a communication strategy on anti-corruption education to inform ACC's public education on corruption, risks and consequences. The communication strategy was finalised and printed during the 2018/19 financial year.

Recommendation(s): The communication strategy should be shared with all OMAs/PE's and RC's to be utilized by the public servants, especially by the Integrity Committees when conducting training for their employees.

Add guest lectures under channels of communication.

Sector	Channels of communication	Key messages	Potential partners
Public Sector	Guest Lecture	Corruption affects service delivery. Corruption affects the poor disproportionately	Add the Judiciary and the Parliament
Civil Society Organizations			Faith based organizations, instead of CCN NANGOF Trade Unions Political Parties
Media		To highlight the negative impact of corruption on service delivery and human rights	Journalist NMT (Namibia Media Trust) MISA (Media Institute for Southern Africa)

Action 4.2.5: *Initiating and carrying out common projects and programmes with an anti-corruption content with NGOs*

Before implementing this action, members of Cluster 3 recommended that surveys be conducted to yield results to inform common projects and execution thereof. Members of Cluster 3 conducted a survey of media houses and Civil Society Organizations during 2017/18 financial year, asking for information on their organization, their specific internal and external activities done to combat corruption, their technical and institutional capacities, and the environment they are in.

About 150 questionnaires were sent out and only 14 questionnaires were received which represented a poor response. The respondents were representative of the fourteen regions.

From the results of the survey it was concluded that most CSOs are located in Khomas Region which presents 64%. Most CSOs are community based organization representing 50%. Most of the respondents of the survey indicated that their CSOs are registered as welfare organisations representing 50%. On the other hand CSOs promoted ethical and moral values among staff members during the past 12 months representing 79%. In addition, 93% of respondents indicated that their CSOs promoted transparency while 79% of respondents indicated that they promoted accountability among staff members during the past 12 month. Moreover, 79%, 71% and 69% of respondents indicated that their CSOs promoted ethical and moral values, transparency and accountability in the community during the past 12 months respectively. Furthermore, 93% of respondents did not participate in any consultative process to aid the combating of corruption. 100% of respondents indicated that their CSOs have not reported any case of corruption to any law enforcement authority during the past 12 months. Furthermore, 100% of respondents indicated that their CSOs did not participate in demonstration (protests) nor did they engage other organisations in combating corruption during the past 12 months. In addition, 93% and 86% of respondents indicated that their CSOs did not conduct research and training on corruption issues during the past 12 months respectively. While 86% of respondents indicated that their CSOs do not have focal persons to deal with Anti-corruption related programs.

The results of the survey also show that 85% and 62% of respondents have designated positions whose job description includes responsibility for research and training respectively. Furthermore, 86% of respondents indicated that their CSOs have good governance policies in place. 57%, 29%, 57% and 36% of respondents indicated that their CSOs have code of conducts that covers ethics, Anti-corruption, transparency and self-regulation respectively. In conclusion, 71% and 64% of respondents indicated that their CSOs produced audited financial statements and annual reports in the past 12 months.

Recommendation: The activity should be continued and carried out in the next Strategy. ACC and the NGO's need to strengthen their relationship to attain result for this action by maximising on the recommendations from the surveys such as ACC to conduct more public education seminars for CSOs in order to increase knowledge on corruption as well as ACC to partner with CSOs in the fight against corruption in order to reduce corruption.

Summary of the progress made on Strategic Objective 4

- NIPAM developed flagship programmes (Foundation Programme, Supervisory Development Programme, Middle Management Development Programme, Senior Management Development Programme and Executive Development Programme) which contain an element of good corporate governance, topics on ethics and integrity.
- Integrity Committee members from various OMAs and RCs were trained on ethics and integrity.
- ACC organised public debates at a regional level for institutions of higher learning in Khomas and Kavango West regions.
- ACC, in collaboration with the Ministry of Education, Arts and Culture organised a national essay competition for secondary school learners in Namibia.
- Anti-corruption themes were introduced in the civic life skills subject in schools and life skills teachers in all the fourteen regions were trained on how to incorporate the topics.
- ACC developed an educational communication strategy used when conducting awareness.
- The public is engaged in the anti-corruption discussion on Facebook and Twitter.

Strategic Objective 5-Preventing corruption in the private sector

Strategic Objective 5 aimed to promote transparency, accountability as well as maintain systems of integrity in the private sector. It also extensively covered issues of extractive industry and marine resources.

There were ten (10) NACS actions (5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6, 5.1.7, 5.1.8, 5.2.1, 5.2.2) under this Strategic Objective. Out of the ten NACS actions, nine actions were implemented and one was not implemented. The majority (eight) of the NACS actions were led by the Ministry of Mines and Energy (MME) and the Ministry of Fisheries and Marine Resources (MFMR).

Specific Objective 5.1: Ensure transparency in the extractive, fishing and other living marine resources industries

Action 5.1.1: *Assess and align current legislations and subordinate legislations with international extractive industry, fishing and other living marine resources industry standards*

MME

During the implementation period, MME sought assistance from the African Legal Support Facility at the African Development Bank to finalise the review of the Diamond and Minerals (Prospecting and Mining) Acts and to benchmark the legislations with best practices and draft regulations. The Ministry also worked with a legal advisor from Attorney-General's Office to incorporate the comments from the workshop that took place in November 2018 towards the review of the acts.

Ministry of Fisheries and Marine Resources (MFMR)

MFMR through fisheries observers, inspectors and a representative of the Confederation of Fishing Associations participated in a corruption risk assessment workshop organised by the ACC in conjunction with UNODC on 27 to 28 March 2019 to further assess the processes, procedures and control aspects related to observers and inspectors' functions.

Recommendation(s): The action should be included in the new Strategy to allow for its finalisation. MME to finalise the drafting of the two Bills, namely, The Minerals (Prospecting and Mining) and Diamond Bills and develop regulations. Benchmarking exercise should be undertaken to align these legislations with international best practises and African Mining Vision.

MFMR to start with the process of reviewing the Act and align it to international best practises.

Action 5.1.2: *Develop proper mechanisms for the transparent and equitable allocation of exploration and mining licences; fishing and other living marine resources rights and/or quotas*

MME

MME established inter-ministerial licencing committees as mechanism to ensure transparency and equitable allocation of different licences. These committees meet regularly to assess

license applications before allocation. Furthermore, the licensing procedures for all licences administered by MME follow the first-come, first-served rule as stipulated in Section 125 under the Minerals (Prospecting and Mining) Act.

To ensure transparency, the Ministry established several committees that deal with the evaluation of minerals applications, namely:

- Mineral license Advisory Committee, which deals with the allocation of Exclusive Prospecting Licences (EPLs) and Mining Licenses (MLs);
- Diamond Licensing and Security Evaluation Committee which deals with the evaluation of diamond licensing applications and review business premises and security plan;
- Upstream licensing Committee, which deals with the evaluation of downstream license applications; and
- Mineral Ancillary Right Commission which adjudicates over disputes between the mineral right holders and farmers/private landowners.

MME introduced additional conditions on mining licence to allocate 5% equity to Empowerment beneficiaries.

MFMR

The Ministry developed an empirical-based scorecard containing weighted criteria to award fishing quotas, but this system is yet to be implemented.

Recommendation(s): The action should be included in the new Strategy as the activities were not completed. MFMR to finalise the development of the scorecard and its implementations thereof, while the MME still needs to develop criteria on awarding licences as well as enforced compliance with the equity allocation provisions.

<p>Action 5.1.3: <i>Incorporate specific access to information components applicable to the extractive industry and fishing industry into Access to Information legislation</i></p>
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MME officially launched the Mining Cadastre Portal (Landfolio) on the 3rd of December 2018 to access information. In order to ensure access to information, the Ministry has launched the licences, rights and permits application guidelines and assessment procedures paper. These documents are accessible by the public on the official website.

Recommendation(s): The action should be included in the new Strategy to allow the MME to incorporate the online licensing and permitting component on the Landfolio system.

The Ministry of Fisheries and Marine Resources to ensure access to information to the public. It was also suggested that the actions are accordingly arranged by sector, thus Fisheries and Mines and Energy Ministries action be appropriately detached from the current sector.

It was further agreed that for the purpose of ensuring inclusion of other private sector bodies such as the Construction Federation amongst others should be part of the part of the cluster. The prevailing condition under the Covid-19 was cited as some of the challenges encountered as challenges affecting the submission of progress reports and other quarterly commitments.

Action 5.1.4: *Ensure transparency compliance with international extractive industry standards set by amongst others EITI by training the relevant officials and by amending existing or incorporating additional regulatory measures*

MME:

In regulating the trade of diamonds, the Ministry complied with the Kimberly Process Certification Scheme aimed at combating conflict diamonds and enhances transparency in the trade of rough diamonds. MME officials from the Department of Mines, Diamond and Petroleum attended the ACC/UNDP Workshop on Enhancing Transparency and Accountability in the Namibian Mining Sector held in October 2019. Furthermore, the Department of Mines received training by the Inter-Governmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF) on capacity building focusing on mineral resource governance and assessment. MME also reported that its officials from the Department of Mines met with officials from MOF (Tax Authority) to discuss issues of transfer pricing.

The Department of Diamond Affairs was engaged in an Ad-Hoc Committee on Review and Reform process to improve the scope of International Kimberly Process in line with the United Nations Security Council 1459 (2003). In addition, Namibia through MME subscribes to the International Atomic Energy Agency (IAEA) which is an international organisation that seeks to promote the peaceful use of nuclear energy and to inhibit its use for any military purpose, including nuclear weapons. However, the Ministry did not ascribe to EITI due to conditions attached to this organisation and financial implications.

Recommendation(s): The action should be included in the new Strategy to allow MME to oversee compliance with IAEA and KPC, as Namibia is a producer and trader of uranium and diamonds.

Action 5.1.5: *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*

MFMR

Namibia acceded the FAO agreement in July 2017 on Port State Measures (PSM) to prevent, deter and eliminate Illegal, Unreported and Unregulated (IUU) fishing.

Recommendation(s): The action is ongoing and should therefore be included in the new Strategy.

Action 5.1.6 (a): *Provide public education on the extractive industry and fishing and other living marine resources industries*

MME

MME conducted road-shows and workshops to sensitise the public on licensing requirements, procedures and processes. MME further used initiatives such as trade fairs, mining expos, and mining indabas locally and internationally to sensitise the public and investors on its work and challenges as well as to promote the mineral resources. MME continues to educate the

small-scale miners on the provision of the Minerals (Prospecting and Mining) Act during field visits. MME signed a MOU with NBC to disseminate information related to geology, mining, energy and petroleum activities.

MFMR

MFMR conducted roadshows in all regions to inform the public regarding the application of fishing rights during 2019/2020 financial year.

Recommendation(s): The action should be included in the new Strategy to keep the public informed with the provisions of the Acts. MME and MFMR intend to work with media houses for the purpose of sharing information to the public on issues relating to natural resources.

Action 5.1.7: *Extractive and fishing and other living marine resources industries to adopt and implement specific anti-corruption and transparency policies and procedures*

MME

The key Anti-corruption and transparency policies implemented are engrained in its laws. For instance, the Minerals (Prospecting and Mining) and Petroleum Acts specifically ban MME staff and their spouses from applying for mineral and petroleum licences. Furthermore, the extractive industry sector legislation details the procedures and criteria that MME must adhere to when assessing and issuing/refusing licences. In addition, members of the evaluation committee are obliged to indicate their interest in the licences being evaluated so that they can be excused from the meeting during the evaluation of that specific licence. MME also reported that the current Minerals (Prospecting and Mining) and Petroleum Acts are undergoing a review and reform process and provisions of anti-bribery will be included. Matters pertaining to anti-corruption and transparency are key considerations when amending these laws. MME established an Ethics and Integrity Committee to deal with the prevention of corrupt practises within the Ministry.

MFMR

MFMR established an Ethics and Integrity Committee to deal with the prevention of corrupt practises within the Ministry. Members received training from ACC officials.

Recommendation: This action should be included in the new Strategy for monitoring and evaluation.

Action 5.1.8: *National grievance and dispute resolution mechanisms w.r.t the extractive industry and fishing and other living marine resources industries will be established*

MME

The extractive industry grievance and dispute resolution mechanisms are defined in the relevant sector legislation. MME established the Ancillary Right Commission to deal with disputes between the mineral right holders and farmers/landowners. The act makes provision for an applicant to approach the Minister if he/she is aggrieved by the decision of the office of the Commissioners (Mining, Diamond and Petroleum).

Staff members serving on the Ancillary Right Commission undertook a trip to //Karas and Erongo region during the 2019/2020 financial year to listen to disputes between landowners and mineral and petroleum right holders in order to resolve conflicts.

The Commissioners for Petroleum, Diamond and Mining have an open door policy and that regular meetings are held with the industry to resolve any issue that might arise.

MFMR

MFMR reported that the national grievance and dispute resolution mechanisms w.r.t. fishing industries has not yet been established. It is, however, envisaged that sector challenges and resolutions will now receive attention once the integrity committee for the fishing industry is established.

Recommendation(s): The action should be included in the new Strategy to allow for the establishment of the committee to deal with grievances and dispute resolutions for the fishing industry.

SO 5.2: Supporting transparency and integrity in private enterprise

***Action 5.2.1:** Conduct assessment to ascertain ways to simplify bureaucratic procedures for service to private enterprises*

The Ministry of Industrialisation, Trade and SME Development (MITSMED) reported that Business and Intellectual Property Authority (BIPA) was established during the period under review. The Integrated Client Services Facility (ICSF) modules in the legacy system have been update during the review period. Name reservation and payments can be conducted online. Customers are also able to check their name reservation status online. BIPA installed the ICSF system in MIT regional offices as part of decentralization of business registration.

MITSMED further reported that the National Single Window (NSW) project, which is intended to enable faster imports and export from and to Namibia, was supported. The Implementation project is now driven through Namport. BIPA executed the selection of a suitable Enterprise Resource Planning (ERP) solution, which enabled BIPA to establish transparently managed financial operations to achieve self-sufficiency.

Recommendation(s): Although this action has been implemented and commendable progress was made, it is recommended that robust civic education be undertaken to allow for aspiring entrepreneurs to make an informed decision.

***Action 5.2.2** Assist enterprises in the private sector to develop internal integrity systems compliance procedures and ethics codes*

No report was received from the Namibia Chambers of Commerce and Industry (NCCI) on the above activities during the years of the Strategy implementation.

Recommendation(s): This action was not implemented due to non-participation by the NCCI despite efforts made to engage the body. Therefore, this action should be included in the new Strategy.

Overall, it is also recommended that the Chamber of Mines as well as Confederation of Fishing Industry be part of the Strategy and the Cluster which will be responsible for private sector, extractive industry and marine resources issues.

Additionally, one of the strategic objectives highlighted herein is to preventing corruption in the private sectors. The approach one takes to involve the private sector and their regulatory bodies is essential. Ideally, one would want to involve them in a manner that lets them see where the problem areas are and have them implement the necessary controls to help manage risks of corruption proceeds being channeled through their services. This could start with keeping records/data that reflect financial and other services abused in the advancement of corruption. For example, in our various engagements with the ACC to seek data, we usually want to understand the specific financial sectors and services abused in the advancement of corruption to determine the types of services most vulnerable to corruption abuse. This would help the ACC and stakeholders such as the FIC, banks, auctioneers etc., to zoom into these specific sectors/services (e.g if cases reflect that cash deposits at banks are vulnerable or livestock purchases at auctions are being used to launder proceeds of corruption, we could then use powers in the FIA to direct that such private sector entities conduct the necessary due diligence when accepting funds.)

Summary of progress made on Strategic Objective 5

- It has aligned its legislation with the Food and Agriculture Organisation Conduct for Responsible Fisheries. The Code sets out principles, and international standards of behaviour for responsible practises to ensure the effective conservation, management, and development of living aquatic resources, for the ecosystem and biodiversity.
- Public education about Namibian aquatic resources is an ongoing activity through participation at trade fairs and roadshows. Awareness campaigns about the oceans have been conducted at schools in the Erongo region.
- Integrity committee has been set to look at-risk areas for the fishing industry.
- The Ministry of Mines and Energy is reviewing its various legislation and policies.
- BIPA introduced a new payment model based on cash, electronic banking transfers, banking deposits and point of sale. An online portal for registration of business names was developed to make things easy for the applicants.
- The online licensing and permitting system was officially launched, and it is operational to ensure access to information.

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

This Strategic Objective focused on enhancing engagement and fostering cooperation with civil society and media in the fight against corruption.

There were six NACS actions. All six NACS (6.1.1, 6.1.2, 6.1.3, 6.2.1, 6.2.2, 6.2.3) were implemented and one action (6.2.2) was completed.

Specific Objective 6.1: Supporting transparency in civil society

Action 6.1.1: *It will be endeavoured to continuously engage relevant CSOs to assist in civic education and research on anti-corruption issues*

A survey report with recommendations on how CSOs are engaged in anti-corruption programmes was finalised and distributed to Cluster members.

About 150 questionnaires were sent out and only 14 questionnaires were received which represented a poor response. The respondents were representative of the fourteen regions. A comprehensive narration of the survey findings are reported under action 4.2.5.

Recommendation(s): The Action should continue, but should be revised so that it is specific. The CSOs need to partner with ACC to pave a way forward to help ACC with civic education and research on corruption (integrity, ethics, transparency, accountability) issues. Therefore, this action should be included in the new Strategy. Stronger collaboration with academic community on research corruption issues. ACC to continue partnering with CSO's in the fight against corruption.

Action 6.1.2: *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*

The National Planning Commission (NPC) reported that in order to move the process forward, three evaluators were nominated to serve as members of the evaluation committee. The Terms of Reference (ToR) of the review process of the CSOs were sent to Parliament, and National Council and NPC. However, the process was cumbersome as NPC is faced with challenges to bring the CSOs on board, in order to do pre-evaluation of the current Government of the Republic of Namibia/Civic Organizations Partnership Policy (GRN/CSOPP) of 2005.

Recommendation(s): This action should be included in the new Strategy. This process needs to speed up by NPC to bring all the CSOs on board for the Civic Organizations Partnership Policy of 2005 to be realized.

This action should be removed completely given its controversy which detracts from the mandate of the ACC. ACC to follow up with the National Planning Commission to speed up the process of Civic Organization partnership policy

Action 6.1.3: *Encourage transparency initiatives through the development and implementation of comprehensive CSOs codes of conduct on ethics, anti-corruption and transparency, as well as the design and implementation of integrity systems for CSOs*

The action was not implemented due to lack of clarity about which institution was supposed to lead this action. The initially identified lead institution (MITSMED), attempted to organise a meeting involving stakeholders such as ACC, BIPA and Namibia Competition Commission (NCC) to clarify the matter. However, the meeting did not take place.

Recommendation(s): The Action needs to be reviewed and revised and made clear as to which institution is the lead. This action must continue in the next strategy. MITSMED should be encouraged to lead the process.

Specific Objective 6.2: Supporting the role of the media

Action 6.2.1: *Continue to build and maintain an enabling environment for a free media in line with the Namibian Constitution*

A survey report with recommendations on how media houses are engaged in anti-corruption programmes was finalised. However, there were challenges of low response rate. The ACC has to implement the recommendations from the survey.

About 78 questionnaires were sent out however only six questionnaires were received back.

From the results of the survey we can conclude that most media house are present in Khomas Region which presents 83%, while most media houses operate on a national level representing 83%. Most of the respondents of the survey indicated that their media houses are registered. On the other hand media houses promoted ethical and moral values among staff members during the past 12 months representing 83%. In addition, 100% of respondents indicated that their media houses promoted transparency while 83% of respondents indicated that they promoted accountability among staff members during the past 12 month. Moreover, 83%, 50% and 83% of respondents indicated that their media houses promoted ethical and moral values, transparency and accountability in the community during the past 12 months respectively. Furthermore, 83% of respondents did not participate in any consultative process to aid the combating of corruption. 100% of respondents indicated that their media houses have not reported any case of corruption to any law enforcement authority during the past 12 months. 83% of respondents indicated that their media houses did not participate in demonstration (protests) nor did they engage other organisations in combating corruption during the past 12 months. In addition, 83% of respondents indicated that their media houses did not conduct research and training on corruption issues during the past 12 months. 83% of respondents indicated that their media houses do not have focal persons to deal with Anti-corruption related programs.

The survey result also shows that 67% and 50% of respondents have designated positions whose job description includes responsibility for research and training respectively. Furthermore, 67% of respondents indicated that their media houses have good governance policies in place. 83%, 50%, 50% and 50% of respondents indicated that their media houses have code of conducts that covers ethics, Anti-corruption, transparency and self-regulation respectively. In conclusion, 83% and 50% of respondents indicated that their media houses produced audited financial statements and annual reports in the past 12 months.

Recommendation(s): The media institutions should be involved in this action to be fully realised. This action should be included in the new Strategy. As recommended from the survey, the ACC should conduct more public education seminars on corruption for media houses and ACC should partner with media houses in the fight against corruption.

Action 6.2.2: *Encourage the media to design and implement internal media codes of conduct on ethics, anti-corruption and transparency, as well self-regulation in reporting on corruption issues*

A new 'Self-Regulatory Code of Ethics and Conduct for Namibian Print, Broadcast and Online Media' was launched in 2017-2018 financial year by the Media Ombudsman, and about 10 000 copies were distributed. The Code of Ethics and Conduct includes online media, making Namibia the only African country that incorporates the three media components (print, broadcast and online). Importantly, all members of the Editors' Forum of Namibia are required to subscribe to the Code.

Recommendation(s): The Media Ombudsman is commended for the good job done; however, sensitization and awareness about the 'Self-Regulatory Code of Ethics and Conduct for Namibian Print, Broadcast and Online Media' should be carried out in the new strategy.

More efforts need to be done to create awareness and popularise the existence of the office of the media ombudsman and the code of ethics. There is a need to create awareness on the mandate of the media ombudsman and the fact it does not cover freelance and citizen journalism.

Action 6.2.3: *Ensure ongoing training of investigative journalists as a priority*

ACC conducted the training for investigative journalists in collaboration with UNODC on the 4th -5th December 2019 at Swakopmund. The objective was to train journalists in investigative journalism and corruption risks assessment with the aim to expose corruption. The topic covered was "The role of the media in combating corruption, investigative methods and tools, protection of information and sources, corruption in the media sector and mitigation thereof".

During the training it was noted that there were limited opportunities are available for training for journalists in specialized fields such as investigative journalism. Therefore training was a welcome addition to their current pool of knowledge and sources.

Information on the investigative methods and tools, and protection of information and sources were for many journalists new and exciting and the opportunity to learn from experts in the field was most welcomed. Informal discussions with the journalists during breaks revealed that journalists took note of their role in the fight against corruption and that the information on the topics will assist them not only to expose corruption but also to prevent fraud, maladministration, etc. The exercise strengthened the ties between the UNODC, ACC and the media sector in Namibia to cooperate in future activities to curb corruption, additional training etc.

The training was conducted by personnel from Shadow World Investigations. There were approximately 24 participants of whom 15 were investigative journalists who attended the

training from Media houses such as Namibia Media Holdings (NMH), The Namibian, Ministry of Information and Communication Technology (MICT), NBC News, NAMPA, New Era, Namib times and DMH.

Recommendation(s): ACC is commended for this achievement since training opportunities for journalists in specialized fields such as investigative journalism are very limited in Namibia but is of utmost essence for the media to effectively expose corruption, practicing ethical journalism and not fall prey to corruption themselves. Since it was only 15 investigative journalists who attended the training, training is recommended for the investigative journalists who were not trained. This action should be included in the new Strategy.

Summary of progress made on Strategic Objective 6

- The Terms of References of the review process of the CSOs were forwarded to Parliament and National Council for input. NPC should follow up the process.
- ACC in collaboration with UNODC conducted training of investigative journalists.
- A new Self-Regulatory Code of Ethics and Conduct for Namibian Print, Broadcast and Online Media was developed and launched. All members of Editors' Forum Namibia are required to subscribe to the Code of Conduct.

3.3 Findings of evaluation criteria

Within the scope of this study, the evaluation also assessed the following criteria: relevance, efficiency and effectiveness, impact, sustainability as well as established partnerships and cooperation. This sub-section presents an analysis of each one of the afore-mentioned criteria as outlined below.

3.3.1 Relevance

The Strategy was the country's response in fulfilling its commitment as a signatory to UNCAC. Article 5 of the UNCAC required all State parties to develop anti-corruption strategies. As a member state to the United Nations Convention against Corruption (UNCAC), the strategy has ensured that all public entities participated to ensure and uphold the rule of law, proper management of public affairs and public property, integrity, transparency and accountability. This was done through progressive policies and programmes that promote accountability and transparency.

The Strategy contributed to the issue of good governance, also fitting supportively in the context of national development and international instruments. These include the country's blueprint Namibia Vision 2030, Fifth National Development Goals and Harambee Prosperity Plan. It is also worth noting that although the Strategy's development was finalised in 2016, it remained relevant over the implementation period. One of the challenges was to execute some of the actions promptly. However, the monitoring system and engagement remained instrumental in tracking progress.

3.3.2 Efficiency and Effectiveness

The multisectoral Strategy was transverse and required a befitting structure for overall implementation. To ensure adeptness, a body was established to monitor and set-direction for the Strategy. The National Anti-Corruption Steering Committee ("Strategy Steering Committee") was set up during the induction workshop of the Strategy. The Strategy Steering Committee was divided into four Clusters, with each Cluster overseeing the implementation of actions under one or two Strategic objectives. Complementary, a Secretariat, in particular, the Directorate Public Education and Corruption Prevention at the ACC assisted the Steering Committee in monitoring the implementation of the Strategy. Moreover, the biasness on the part of the Secretariat though probable, it is limited due to the inclusive involvement of all Cluster members.

The Secretariat developed various monitoring tools. In the first instance, the Strategy had an action plan with a set of indicators which aided in the tracking process according to the set timelines. The monitoring and reporting tools, including templates as well as process were developed with the assistance of the experts provided by the United Nations Development Programme (UNDP) in Namibia. Such tools enabled the Secretariat to accord support to the Steering Committee. Not only for reporting but also in fostering cooperation amongst members/ implementing institutions. As such, most of the implementing institutions managed to execute their actions promptly.

This is despite some institutions not achieving the initially set goals or executing the actions they were responsible for. But overall, the actions that were completed and the achievement of the targeted results can be attributed to the Structures and tools put in place, which proves efficiency. Overall, Secretariat was well placed at the ACC, but rather specific personnel should be assigned to conduct this role. However, the Secretariat also encountered some challenges. Although the UN Volunteer developed tools, and NIPAM

provided some short courses and in-house sessions, it was not sufficient. Extensive training was also required in monitoring progress under the Strategy by the secretariat.

These include Secretariat also required versatile skills and a good resource of general knowledge of the work of public and private sectors as well as civil society

To address this shortcoming, robust engagement was undertaken amongst stakeholders. It was also felt that some Cluster chairpersons were not proactive and supportive of Secretariat.

Another notable challenge was that some implementing institutions were not committed, and others were not active. Also, it was noted that initially, there was a sense of ownership during the drafting and development process. However, some stakeholders fell off the trail during the implementation process. Despite the challenges, some components were commendable such as having the members meeting to deliberate on progress. The Steering Committee was well placed to oversee the Strategy.

Another challenge was the chairmanship of Clusters that had changed too often in a short time. Some Cluster chairpersons were also not committed to their roles in providing leadership to the Cluster.

The Strategy inspired innovation and change. For example, some institutions' systems evolved from manual to integrated electronic systems such as the e-justice system.

Recommendations: For efficient and effective implementation of the NACS it is imperative that the strategy should readjust the structural arrangement of the NACS. The propose structure in the new strategy should be considered as follows:

Firstly, an oversight committee, ideally, a Parliamentary Committee responsible for governance, accountability, transparency, integrity, ethics or anti-corruption matters should be appointed or established to serve as the highest body for accountability to the Namibian nation with regard to the implementation of NACS. The committee should consist of parliamentarian and will meet once at the end of the government financial year (between January and March) to hold NACSC members accountable on the implementation of NACS actions. It is at this Annual Conference that the NACS Annual report should be tabled by the National Anti-Corruption Steering Committee (NACSC) Chairperson for approval. The committee will supported by the NACS Secretariat.

Secondly, the National Anti-Corruption Steering Committee (NACSC) should be maintained, however, this committee should comprise of political office bearers, namely Minister or Deputy Ministers, Regional Governors, Regional and Local Councillors i.e. Chairperson of Management Committees and Majors, or Board members from implementing institutions such as Offices, Ministries and Agencies, Regional Councils, Local Authorities, Public Enterprises, Non-Governmental Organizations and Civil Society Organization. NACS members will be responsible for Monitoring and Evaluation of the implementation of NACS actions. This committee will also be responsible for setting national direction for the implementation of the NACS. It will also be a decision making body for any adjustment to be made on NACS M&E framework. This committee should meet Bi-Annually and the NACS quarterly reports should be tabled by the NACSC Cluster Chairpersons and endorsed by NACSC members. This committee will be supported by the NACS Secretariat.

Thirdly, the NACSC Clusters should be maintained, nevertheless, this committee should comprise of Accounting Officer or Executive Directors, CEO's, MD's form all implementing institutions and their key stakeholders. The committee will be responsible for spearheading

the implementation of the NACS actions within their respective institutions. This committee is an implementation committee; it is the champions of the NACS implementation and thus has the administrative decree to availing necessary resources both human and financial for the successful implementation of NACS actions within their ambit. The committee should meet quarterly to update each other on the progress with regard to the implementation of NACS actions. Cluster reports should be compiled from these meetings, together with formal reports from implementing institutions, these reports will culminate into quarterly reports which will be tabled by cluster Chairpersons at the bi-Annual NACSC Meetings.

3.3.3 Impact or added value

The Strategy has been an appropriate vehicle for promoting transparency, accountability and ethics. The Strategy enabled the country not only to account for various actions but also implemented policies in closing the loopholes of corruption. It is noted that the three years were short. As a result, the evaluation focused more on the short-term value the Strategy had on the country, rather than an impact assessment. Moreover, the Strategy obligated institutions to report on some of the activities that they did not report before.

3.3.4 Sustainability

One of the elements of the Strategy was the ownership and continuity of the various 75 actions. The actions and central objectives were built and founded in the legislation and mandate of the implementing institutions. The actions and activities under the Strategy did not move away from the core functions of institutions. As such the activities continue beyond the Strategy.

In terms of monitoring, there is a need for revision of the reporting tools, as well as training of focal persons for the Strategy in each institution.

Furthermore, some institutions did not take ownership of the actions. This is attributed to the fact that some of the actions were not clear or what was expected from them. This derailed progress in implementation of the Strategy. This was countered through robust engagement by the Secretariat with respective institutions.

Another challenge was the enforcement of actions. At the inception, it took a while to have the accounting officers or institutions to understand the Strategy and enforce implementation of actions. This was achieved through the consultative process.

Furthermore, while the Strategy played a crucial role in promoting accountability and transparency, financial constraints derailed the full implementation of the completed activities. For instance, the Whistleblower Protection Act 10 of 2017 was enacted, but could not be rolled-out due to lack of funding.

While the Strategy did not have an exit plan, moving forward, it will be highly recommended that the actions be embedded in the annual plans and implementing agencies' strategic plans.

3.3.5 Established partnerships and cooperation

Central to the implementation of the Strategy were various stakeholders. Several tools and platforms were initiated and employed to bring stakeholders together. These included the quarterly meetings for implementing institutions and NACS Secretariat, Clusters and NACSC. Members of the NACSC include accounting officers from selected Offices/Ministries/Agencies (O/M/As) and representatives from the private sector, Civil Society Organizations (CSOs) and the media. Meetings of the NACSC are held quarterly. The meetings are chaired by the ACC Director-General.

Meetings of the NACSC are held quarterly. The meetings are chaired by the ACC Director-General. Between 2017/18 and 2019/2020 financial years, a total of 34 Cluster meetings were held.

2017/18: Cluster 1 held five meetings
Cluster 2 held three meetings
Cluster 3- held six meetings
Cluster 4 held seven meetings

2018/19: Cluster 1 held four meetings
Cluster 2 held three meetings
Cluster 3 held two meetings
Cluster 4 held three meetings

2019/20: Cluster 1 held two meetings
Cluster 2 held two meetings
Cluster 3 held two meetings
Cluster 4 held one meeting

While since 2017/18 to 2019/2020 financial years, the Steering Committee met nine times as follows:

- **2017/18:** Meetings of the NACSC have taken place on the following dates: 15 February 2017, 15 June 2017, 12 September 2017, and 5 December 2017.
- **2018/19:** Meetings of the NACSC have taken place on the following dates: 4 July 2018, 5 December 2018, and 6 March 2019.
- **2019/20:** Meetings of the NACSC have taken place on the 6th June 2019 and 12th September 2019.

Moreover, in tracking progress, a reporting process, as mentioned in preceding sections, was developed. The process also entailed implementing institutions providing quarterly progress reports to the Secretariat. In fulfilling their role of reporting on the actions/activities as well as engagement, institutions had to submit quarterly reporting/request letters. Reports were sent quarterly. Some tangible evidence of activities was also shared- media ombudsman: Code of Ethics and Conduct.

The various engagement platforms, such as the Cluster meetings were also instrumental and useful. Ideas were shared and discussed in the meetings at NACSC and Cluster levels. Clarity of objectives was discussed by the secretariat and implementing institutions, and common understanding was reached.

As such, the partnerships propelled the strategy into success because of the partnerships inputs and roles to ensure that objectives were met.

Despite the successes, some challenges persisted during the implementation period. Some implementing institutions were not sending their quarterly reports on time or not sending at all. Some NACSC members were not attending the meetings. As a result, some implementing institutions derailed progress due to non-participation. The challenges were usually resolved by bringing the parties together to find amicable solutions and meetings were held to iron out the outstanding reports or misunderstandings regarding the reporting. Some NACS actions were not clear as to which institution is leading the activity. Implementing agencies & NACS secretariat meetings were held to explain the actions and solve the matter.

Broadly, the platforms exacerbated the promotion of accountability and transparency. Each institution was made to be responsible and took ownership of its action by reporting on the activities carried out as stipulated in the strategy. Burning issues and information were discussed openly during cluster meetings and NACSC.



RECOMMENDATIONS

4. CONCLUSION AND RECOMMENDATIONS

The evaluation of the National Anti-Corruption Strategy and Action Plan (2016-2019) set out to determine the extent to which the Strategy objectives were met, progress made by implementing institutions in carrying out their commitments to close loopholes for corruption under the Strategy as well as derive recommendations and best practices for executing the next phase of the Strategy (2021 to 2025). The results would form as a basis for information to inform the crafting and set a direction for the implementation of the second anti-corruption strategy.

The evaluation found that the Strategy was a relevant instrument to promote systems of integrity in various spheres of society in Namibia. During the implementation period of 2017 to March 2020, of the 75 actions in the National Anti-Corruption Strategy (2016-2019), 70 actions representing 93 per cent have been implemented while 5 (7 %) were not implemented during the period under review. Out of the 70 NACS actions implemented, 15 (20 %) were completed.

To better understand the extent of implementation, the evaluation further delved into the various criteria. It can be concluded that the Strategy was relevant to the locale context, and based on a sound analysis of the situation of the fight against corruption, implemented effectively, sustainable added great value and fostered partnerships and cooperation, which critical components for successful implementation of any strategy.

Based on the progress outlined above, the Strategy objectives were met. This was achieved as a result of the commitment by implementing institutions through synergy and robust undertaking. While great progress was noted, some institutions and sectors, in particular, civil society and the private sector were not active in the implementing actions set out in the Strategy.

Moreover, the NACSC Secretariat was instrumental in monitoring implementation progress. However, the Secretariat could be further strengthened by a stronger focus on capacity building, resources allocation and technical support. This would enable the Secretariat to remain at the cutting edge of innovation and emerging trends to enhance the core added value in the implementation of the second Strategy. In general, the Strategy implementing body and the Namibian Government at large would benefit a lot from more visibility of the achievement of its work.

In any research or study, it is important that results are representative and validated. The findings of the evaluation were subjected to external validation by the implementing institutions, Strategy Steering Committee members as well as other stakeholders.

A validation workshop was held from 14 to 16 October 2020 in Windhoek.

Overall, the Strategy, which was transverse into diverse areas of society, cooperation and inclusion remained central to its implementation until its end in March 2020. Complementary, it served as an instrument that promoted accountability, transparency and fostered synergy across various sectors. The evaluation, therefore, submits that the Namibian Government, all sectors and spheres of society actively participate in the development and implementation of the second strategy.

In light of the findings and conclusions of this evaluation, the evaluation team recommend the following to inform the formulation of the new anti-corruption strategy and aid to the national goal for a corrupt-free society:

- Majority of the actions should be retained in the new Strategy 2021-2025 as they are enshrined in the mandate of the lead institutions and some were not fully implemented.
- Revisit the strategic objectives to ensure that they respond to current and evolving national needs (integrity systems, good governance, and accountability). An analysis would inform this of the patterns and other developments. Not only in the sectors initially enshrined in the Strategy but also in other sectors such as agriculture, tourism or as deemed relevant.
- Furthermore, the Clusters and Steering Committee meeting would be retained. They were instrumental in fostering cooperation and served as a platform to account for actions and exchange ideas.
- While the NACSC was well-placed to set direction and play an oversight role, it is recommended that there should be another oversight body above the NACSC, in particular, a parliamentary committee or ministers. This would demonstrate strong political will and inspire national confidence.
- That Secretariat should comprise of a team assigned and dedicated to the new Strategy only. With the previous Strategy, Secretariat work was ad hoc, and not in line with the institutional Strategic Plan.
- There should be dedicated resources for capacity building. Moreover, the Secretariat must be actively involved in specific sector programmes under the Strategy
- Moving forward, it is recommended that the reporting and monitoring tools be revised to align with the new Strategy and remain relevant.
- To ensure institutions take ownership, it is recommended that robust engagement be undertaken at all stages of the Strategy. These include the formulation process, inception, and throughout the implementation process.
- Another recommendation is that the representatives be part of the Steering Committee be rather the Ministers or Political office bearers. This aspect should be considered in the drafting of the new Strategy—Steering Committee- who should be the Steering Committee.
- The optimal way of moving forward into the new strategy is to develop an exit plan and foster robust cooperation with the development agencies. Also, the next Strategy to have clear Key Performance Indicators. And should come from the implementing institutions.
- There is a need for the Steering Committee to update the nation on 'quick gains' regularly. It is therefore recommended that the new Strategy come up with a communication plan in this regard.



LESSONS LEARNED

5. LESSONS LEARNED

1. Through the implementation of the Strategy, various policies and programmes were undertaken. These remain instrumental in maintaining systems of integrity, promoting accountability and transparency as well as good governance.
2. The Strategy provided a platform for members of the NACS Steering Committee to make their due contribution in achieving the goals or objectives set out in the Strategy. The Steering Committee also fostered cooperation, and enabled members and implementing institutions to account for their actions as part of the monitoring process. This paved the way for the established of the Clusters, which made the monitoring progress manageable.
3. The quarterly Cluster meetings served as great platforms during the implementation period. Implementing agencies reported on progress made and the challenges faced. Cluster members also provided support and advice in efforts to accelerate the implementation of the actions. Likewise, the implementing institutions were held accountable by the Clusters, thus added credibility and accountability.
4. The Secretariat played a critical role in providing support not only to the Steering Committee but also towards the monitoring progress during the implementation period. These included organising meetings, taking meeting minutes, as well as preparation of reports for the Cluster Chairperson. Furthermore, prepare the quarterly progress and annual reports.
5. At the start of NACS implementation, it was important for implementing agencies to understand their planning, implementation and monitoring roles. This understanding greatly advances the implementation and monitoring of NACS actions. Solutions to address this challenge could include the following: (a) Formalising and affirming the commitment of implementing agencies such as having a commitment page in the NACS document with signatures of heads of implementing agencies; (b) meeting with individual implementing agencies to affirm commitment and expectations; (c) clearly defining the terms of reference for implementing agencies; (d) having a workshop with implementing agencies to discuss expectations regarding NACS, and (e) inviting implementing organisations to participate in Cluster meetings.
6. Strong working linkages between Secretariat and the implementing partners were crucial. This was done at both formal and informal levels. Correspondence through the accounting officers demonstrated the commitment and accountability by institutions to the Strategy. It is thus important for institutions that failed to account for actions to accelerate the country's efforts in the fight against corruption.
7. Coordinating a national strategy is akin to undertaking an organisational change process. The coordinating organisation has a significant role in advancing the implementation of the strategy. Some processes and skills become more important than others. The role requires having a strategic perspective, along with skills in communication, negotiation, coordination, analysis, initiative, and collaboration. It also required flexibility, adaptability and the capacity to learn as the organisation

assumes new roles and responsibilities, e.g. Secretariat role. For the Public Education and Corruption Prevention (PECP) Directorate tasked with the Secretariat role, understanding and assuming new roles and responsibilities required changes to its work processes and priorities. It also required monitoring the responsibilities of staff to ensure fair distribution of workload. Internal communication is very important for sharing information not only from top to bottom of the hierarchy, but also between those responsible for Clusters, enabling everyone to move in the same direction, and/or having the same understanding of the strategy itself.

8. Coordinating a national strategy provides tremendous learning opportunities for the staff of the coordinating organisation, for example being involved in the Secretariat role. Staff members have learned, how to improve their work processes, hone their supervisory skills, coordinate with implementing organisations, organise meetings, analyse the progress of NACS actions, write accurate meeting minutes and correspondence, prioritise workload while aiming to meet service standards on timeliness and quality of work. Another area of learning is in Monitoring and Evaluation, as staff familiarise themselves with monitoring principles and reporting tools and analyse reports that are submitted by implementing agencies. Clarifying the roles of the Secretariat members early on and providing learning opportunities is very important.
9. A communication plan is imperative for the success of the Strategy. As such, civic education and awareness about the strategy should go hand in hand with the implementation. Awareness is a requisite stage before a change in behaviours, attitudes, practices and policies.
10. Celebrate progress, including incremental progress (the 'quick gains').

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