



REPORT OF THE EVALUATION OF THE INTEGRITY COMMITTEE PROGRAMME **2023**



ANTI-CORRUPTION
COMMISSION

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Executive Summary

The Integrity Committee Programme in Zambia seeks to institutionalise the prevention of corruption in the public and private sector. Hence, the Committees are premised on the rational that, it is the responsibility of each respective institution to internally prevent corruption and related malpractices from occurring within its spheres of influence.

This 2023 evaluation report of the Integrity Committee Programme is based on the evaluation criteria of assessing the *relevance, coherence, efficiency, effectiveness, impact* and *sustainability* of the Programme, as a means of establishing the performance of the Programme in order to provide an understanding of the successes and challenges faced during implementation.

This is intended to provide new information to guide the roll-out of more Integrity Committees to all Ministries, Provinces and Spending Agencies (MPSAs) and in the private sector.

The Evaluation also assessed the extent to which recommendations in the 2015 evaluation report of the Programme were implemented by various institutions; reviewed the IC Monitoring, Evaluation and Assessment (MEA) tool; and developed an Integrity Committee Programme Logical Framework with appropriate performance indicators.

The Evaluation was conducted between October and December, 2023, and is based on desk reviews, Key Informant Interviews conducted in 42 public institutions; Focus Group Discussions; and Exit Polls administered in 39 public institutions.

In addition, the Report provides lessons and challenges from the Integrity Committee Chief Executive Officers' (CEO) Forum held in November 2023.

Lastly, insights on the provision of Programme oversight delegated to the Secretary to Cabinet were solicited after completion of the Evaluation.

A. Summary of Key Findings

Relevance

How well the Programme is designed in order to meet its overall objective, is *satisfactory*. Notable is that there are no observed shortcomings in how well the Programme is designed with respect to consistency with policy and law, and its usefulness and the value of Programme interventions.

Coherence

The extent to which Programme interventions are aligned with other interventions implemented by an institution is *satisfactory*. However, there are major observed shortcomings in the Programme pursuit to have a non-peripheral (unimportant) perspective; and this is most observed in Local Government institutions.

Efficiency

The extent to which the Programme interventions delivered or likely delivered, intended results in a cost-effective manner is *highly satisfactory*. That is, in general, there are no observed shortcomings in the cost-effectiveness of Programme in delivering, or likely delivering the intended results. However, there are minor observed shortcomings in the extent to which the cost of the Integrity Committee Programme services or activities is reasonable in relation to the benefits.

Effectiveness

There are severe observed shortcomings in the extent to which the Integrity Committee Programme interventions have produced the desired results (that is Programme effectiveness, is *highly unsatisfactory*).

Public awareness of Integrity Committees and Integrity Committees' development of Annual Corruption Prevention Action Plan (ACPAP) and Quarterly Progress Reports (QPR) and their submission to the Anti-Corruption Commission (ACC), thereof is, *highly undesirable*.

There are low percentage numbers of members of public that are aware that an institution has a service delivery charter, as a charter was only evidenced in 10 or 32.3% of the institutions.

Knowledge of existence of a service delivery charter is higher in Quasi-Government institutions; and the lack of knowledge that there is a service charter in place, is highest in Public Service institutions.

A major concern is the observed unsatisfactory introduction of Codes of Ethics in the Public Service (35.7%) and the Local Government (46.2%) institutions, despite the fact that, there is a Code of Ethics for the Public Service and Local Government.

Impact

The extent to which Integrity Committees have made a difference on corruption and malpractices experiences in the institutions is *satisfactory*, which is there are minor observed shortcomings in Programme impact.

However, whereas public access to services has a dominant performance rating of *satisfactory* (47.9%), public vulnerability to corruption and malpractices has a dominant performance rating of *highly unsatisfactory* (23.4%).

In addition, although actual individual experiences of corruption or malpractices are low (10.3%) so too, is reporting of such experiences (10.7%), with the most frequent reason for not reporting an experience of corruption or malpractice being that individuals affected do not know where to report.

Wherein equality in accessing a public service is unsatisfactory, this is mostly because of lack of adapted infrastructure, prioritisation policies, behavioural marginalisation, and insufficient adapted guidelines and/or instructions.

Sustainability

Programme sustainability is *likely*, as there are minimal risks to the Programme continuing into the foreseeable future, because some benefits are observable.

B. Key Lessons and Recommendations

No.	Lesson/ Shortcoming	Recommendation
1	Continued reconstitution of the Committees due to trained membership turnover.	Wherein the turnover is a result of transfers, there is need to institute handover guidelines and ensure adherence to, thereof.
		Previously trained IC members should become ex-officials in their new institution.
2	Inadequate Programme advisory support and capacity building.	Enhance Programme advisory/technical support and responsive capacity building.
		Increase the number of Desk Officers
3	Budget constraints.	Seek Cabinet/Treasury intervention on need for Programme activities budget prioritisation.
4	Unchanging corruption/bribery behaviours.	Adopt mindset/behavioural change programmes.
		Enhance awareness of existence of service charters and Integrity Committees in institutions where they are in place.
		Scale up provision of anti-corruption information and experience sharing.
		Establish dedicated integrity or ethics units in institutions.
5	Integrity Committee membership prescribed structure is not suitable for all institutions.	Ensure that membership of Integrity Committees is responsive to individual institutional needs.
		Ensure that membership structure is inclusive of all core units/departments in an institution, with particular emphasis on integrity units.
6	Insufficient Programme monitoring.	Institute responsive Programme monitoring and review mechanisms. (Programme reviews/monitoring in specified time periods).
		Engage in Programme spot checks.
7	Weak implementation of IC recommendations and adherence to Guidelines, in particular development and submission of ACPAPs and QPRs.	Ensure adherence to Programme guidelines.
		Stipulate administrative sanctions for non-adherence to guidelines.

No.	Lesson/ Shortcoming	Recommendation
8	Insufficient internal and external awareness of existence of IC and sensitisation; and reporting malpractices to Committees, thereof.	Conduct responsive targeted IC Programme sensitisations activities to enhance internal (staff) and external (public) awareness. Conduct responsive capacity building.
9	Programme is a demand on staff's contractual workplace responsibilities and/or added responsibility hence its ad hoc nature.	Integrate Programme responsibilities into staff performance appraisals.
10	Lack of dedicated fulltime Secretariat.	Establish a fulltime Secretariat as provided for in the Programme guidelines.
11	Antipathetic environment due mostly to Integrity Committees having a peripheral (unimportant) perspective and insufficient willingness to institute Integrity Committees due to inadequate management support.	Ensure adherence to Programme guidelines. Strengthen management engagement and enhance transparency. Conduct responsive targeted IC Programme sensitisations activities to enhance internal (staff) awareness.
12	Insufficient reduction of interpersonal contact.	Adopt e-Governance. That is, adoption of the use of Information and Communication Technology to enhance work efficiency and improve service delivery in order to meet the needs of the public in a responsive and transparent manner.
13	Programme objectives are not institution-specific.	Adopt client-focused interventions.
14	Inadequate compatibility with other likely corruption prevention/integrity units.	Revise the membership structure to include all core units/departments in an institution, as a means of strengthening complementarity, harmonisation and co-ordination with other units within an institution.
15	Lack of internal consultation and/or Inadequate staff engagement, support and reporting.	Strengthen management and Integrity Committee engagement and enhance transparency.
16	Existence of inequalities in accessing a public service.	Strengthen adherence to regulations that make availability of adapted infrastructure mandatory. Develop and implement prioritisation policies and adapted guidelines and/or instructions for the vulnerable population. Conduct awareness programmes on the effects of behavioural marginalisation.

C. Secretary to Cabinet Recommendations

The recommendations following the engagement with the Secretary to Cabinet on the Programme are:

- (a). Establishing an Integrity Committee coordinator/unit at Cabinet Office who/which will be responsible for Programme liaison with MPSAs;
- (b). The Permanent Secretary heading the Public Service Management Division (PSMD) to engage SMART Zambia in operationalising the Code of Ethics for the Public Service and Local Government.
- (c). Developing an overarching Integrity Committee Programme coordination policy;
- (d). Uniformity in development of service delivery charters; establishment of customer service centres; and in the development of organisational ethical and governance policies on Conflict of Interest, Whistleblowing, Gifts and Benefits and Complaints Handling; and,
- (e). All Public institutions to have full-time ethics or integrity officers to ensure performance of the Programme interventions, and adherence to such interventions wherein it applies.

Foreword

The Government of the Republic of Zambia has since 2006 been implementing the Integrity Committee (IC) Programme through Cabinet Office in conjunction with the Anti-Corruption Commission (ACC). The IC Programme aims at institutionalising the prevention of corruption in Ministries, Provinces, and Spending Agencies (MPSAs) and the Private Sector. To this end, ICs have been putting in place measures to reduce the opportunities for corruption and related malpractices. Such measures include, among others, development of customer service charters, code of ethics, gift policies, and whistle-blower policies.

In order to assess the performance of the IC Programme and inform the continued roll-out of ICs, the Government of the Republic of Zambia with support from the Germany Agency for International Cooperation (GIZ) and the European Union (EU), conducted an evaluation of the IC Programme. This evaluation was based on the evaluation criteria of assessing relevance, coherence, efficiency, effectiveness, impact and sustainability.

I am glad to note that the findings of this evaluation have brought out some key successes and challenges that will provide lessons as we all work towards improving the IC Programme. Among the successes of the IC Programme include the development of anti-corruption best practices such as customer service charters, code of ethics, and gift policies.

However, the implementation of the IC Programme has been facing a number of challenges. These include, among others, high turnover of trained IC members, budget constraints, lack of dedicated fulltime Secretariat, and lack of adherence to guidelines as stipulated in the Handbook for Integrity Committees on Corruption Prevention.

I therefore, urge all the MPSAs, the Private Sector and other stakeholders to utilise the findings of this report and implement its recommendations. This will enhance evidence-based decision-making in the planning, designing, coordination and implementation of IC programmes and activities. Ultimately, opportunities for corruption will be greatly reduced thereby improving service delivery in our country.

I wish to assure you all that the Commission will continue to provide technical support to all IC institutions. To this end, I urge all institutions that have not yet established ICs to do so.



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SECRETARY TO THE CABINET

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Acronyms

AC	Anti-Corruption
ACC	Anti-Corruption Commission
ACPAP	Annual Corruption Prevention Action Plan
CEO	Chief Executive Officer
CEEC	Citizen Economic Empowerment Commission
8NDP	Eighth National Development Plan
ICs	Integrity Committees
ICPE	Integrity Committee Programme Evaluation
KIIs	Key Informant Interviews
LiCC	Livingstone City Council
MoL	Ministry of Lands
MEA	Monitoring, Evaluation and Assessment
MPSAs	Ministries, Provinces and Spending Agencies
NACP	National Anti-Corruption Policy
NIPA	National Institute of Public Administration
NRFA	National Road Fund Agency
PSPF	Public Service Pension Fund
QPR	Quarterly Progress Reports
RTSA	Road Transport and Safety Agency
SDC	Service Delivery Charter
ZPS	Zambia Police Service
ZRA	Zambia Revenue Authority

1.0 Introduction

1.1 Context

The Integrity Committee Programme in Zambia seeks to institutionalise the prevention of corruption in the public and private sector. Integrity Committees are cross-functional committees established to spearhead the prevention of corruption and other malpractices.

The overall objective of the Integrity Committee Programme, in the main, is to mainstream corruption prevention in the routine business of government agencies and the private sector. The Committees are premised on the rational that, it is the responsibility of each institution to internally prevent corruption and related malpractices from occurring within its operations.

Thereof, the Committees are expected to take pre-emptive measures to reduce the opportunities for corruption and related malpractices in their respective institutions. With such measures including development, implementation and enforcement of anti-corruption best practice policies and guidelines, such as Gifts Policy, Conflict of Interest Policy and other integrity related Policies; receiving complaints on unethical conduct, malpractices and poor service delivery from within and outside the organisation; initiating and facilitating the conduct of Corruption Risk Assessment and coming up with mitigative measures; developing annual corruption prevention plans; and, ensuring publicity of such measures and the Integrity Committee itself internally and externally, thereof¹.

The intended effect of Integrity Committees is enhanced transparency and accountability in the delivery of public services, reduction in incidences of corruption, malpractices, and improved service delivery in the institutions.

The Programme oversight is provided by the Secretary to the Cabinet, while the Anti-Corruption Commission facilitates the establishment of the committees; provides training and, advisory and support services; undertakes monitoring of the Programme; and, evaluates the effectiveness of corruption preventive measures put in place.

The first Integrity Committees in the country were established in 2006, totalling eight (8). These were in the Anti-Corruption Commission; Immigration Department; Lusaka City Council; Ministry of Lands; Ndola City Council; Public Service Pension Fund; Zambia Police Service; and Zambia Revenue Authority. By December 2022, a total of 139 Integrity Committees had been established. The Programme had an external evaluation in 2015; and an internal one in 2021.

This report provides the findings of the evaluation conducted between October and December, 2023.

The report is structured as follows: context, purpose and rationale, objectives, and scope; evaluation methodology; findings; discussion; conclusions; and, emerging issues and recommendations.

1.2 Purpose and Rationale

The purpose of the 2023 external evaluation of the Integrity Committee Programme was to assess the performance of the Programme in order to provide an understanding of the successes and challenges faced during implementation.

In addition, the purpose of the Evaluation is to provide new information to guide the roll-out of more ICs to all Ministries, Provinces and Spending Agencies (MPSAs) and in the private sector.

This is rationalised by the fact that the Programme has not been externally evaluated since the last evaluation in 2015. Hence, there was need to undertake the 2023 evaluation given a 66.9% increase in the number of Integrity Committees as up to December 31 2022.

¹ Handbook for Integrity Committees on Corruption Prevention (2022).

In addition, the evaluation findings and recommendations will inform and guide the Anti-Corruption Commission (ACC), the government of the Republic of Zambia, and various stakeholders including cooperating partners on the successes and challenges in the implementation of the Programme.

1.3 Objectives

The overall objective of the 2023 Evaluation was to get insight information on the implementation of the Integrity Committee Programme in terms of, among others, public awareness, operations, successes and challenges in order to improve implementation and its continued roll-out.

The specific objectives were to:

- (a) Assess the relevance, coherence, efficiency, effectiveness, impact and sustainability of the IC Programme;
- (b) Assess the extent to which recommendations in the 2015 evaluation report of the IC Programme were implemented by various institutions;
- (c) Assess the IC Monitoring, Evaluation and Assessment (MEA) tool;
- (d) Develop an Integrity Committee Programme Logical Framework with appropriate performance indicators;
- (e) Establish the challenges ICs are facing in the implementation of the IC activities; and to,
- (f) Draw lessons and make recommendations for future successful implementation of the IC Programme.

The scope of works is provided in Annex 1.

2.0 Evaluation Methodology

2.1 The 2023 Integrity Committee Programme Evaluation

The evaluation model used in this methodology is an adaptation of the actor model. The model constituted the following components:

(a) Client-oriented model

This focused on the clients' perspectives of the Programme. Clients are herein defined as the Integrity Committee members in institutions implementing the Programme; and other staff in the institutions.

(b) Stakeholder model

The stakeholder model focused on external stakeholders' perceptions and experiences in the institutions where the Programme is being implemented. The external stakeholders constituted public service seekers or users.

(c) Peer review model

This focused on the perspectives of the Anti-Corruption Commission staff and Cabinet Office, which coordinates and oversees the Programme, respectively.

Based on the objective and scope, the 2023 Integrity Committee Programme Evaluation (ICPE) criteria consists of programme relevance, coherence, efficiency, effectiveness, impact, and sustainability².

2.1.1 Relevance

Programme relevance is conceptualised as the degree to which the objectives of a Programme are, or remain, pertinent, significant and worthwhile, in relation to the identified needs. Relevance also considers whether the structural (design) of the programme meets its goal or objectives.

The evaluation question was:

"How well is the Programme designed in order to meet its overall objective?"

The sub-questions interrogated six key areas. These are, programme:

(a) Consistency with policy and law.

(b) Design and implementation.

(c) Relevance to needs and priorities of Programme implementing institutions.

(d) Consistency with priorities for Anti-Corruption in Programme implementing institutions.

(e) Usefulness and value of Programme Interventions.

(f) Activities and outputs consistency with Programme Goal and intended impacts and effects.

2.1.2 Coherence

Coherence relates to how well the Programme interventions fit into, first, the wider policy frameworks of the implementing institutions and their alignment with other interventions implemented in the institution.

The evaluation question was:

"Are the Integrity Committee Programme interventions aligned with other interventions implemented by the institution (internal coherence)?"

The sub-questions interrogated four key areas. These are:

(a) Compatibility and synergies.

² Annex 2, provides the Evaluation Matrix.

- (b) Complementarity, harmonisation and co-ordination.
- (c) Institution-centrism and value addition.
- (d) Programme seamlessness.

2.1.3 Efficiency

Efficiency is conceptualized as the extent to which the Programme interventions deliver, or likely delivers, intended results in a cost-effective manner.

The evaluation question was:

“To what extent do the Programme interventions deliver, or likely deliver, intended results in a cost-effective manner?”

The sub-questions interrogated three key areas. These are, Programme:

- (a) Use of allocated funds.
- (b) Cost effectiveness of Programme interventions.

2.1.4 Effectiveness

Effectiveness measures the extent to which interventions achieve the objectives of a programme or project.

The evaluation question was:

“To what extent did the Integrity Committee Programme interventions produce the desired results?”

The sub-questions interrogated five key areas. These are:

- (a) Key interventions introduced to date.
- (b) Public perceptions and experiences.
- (c) Process effectiveness.
- (d) Coordination and management frameworks.
- (e) Programme capacity building.

2.1.5 Impact

Impact is herein conceptualised as a measure of change in the environment as a consequence of achieving the purpose of project interventions.

The evaluation question was:

“What difference has the Integrity Committee interventions made on corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) experiences in the institution?”

The sub-questions interrogated four key areas. These are:

- (a) Reduction in vulnerability to corruption and malpractices.
- (b) Change in attitudes towards reporting bribery and unethical behaviours.
- (c) Equality in access to a public service.
- (d) Public perceptions and experiences.

2.1.6 Sustainability

Sustainability asks the question - will the benefits last? That is, it is a measure of the extent to which the net benefits of a programme or project intervention continue or are likely to continue.

The evaluation question was:

“Will the Integrity Committee Programme benefits likely continue into the foreseeable future?”

The sub-questions interrogated three key areas. These are continuity in:

- (a) Benefits of the Programme.

- (b) Design and implementation.
- (c) Independent implementation (that is, whether Programme implementing institutions have gained the ability to independently continue implementing the Programme).

2.2 Sources of Data

Quantitative and/or qualitative data was sourced using the following.

2.2.1 Desk Review

- A. Background documents relevant to understanding the genesis of the Integrity Committee Programme; and its rationalisation.
 - (a) National Anti-Corruption Policy (NACP) and its Implementation Plan.
 - (b) Eighth National Development Plan (8NDP).
- B. Laws that effect corruption prevention.
 - (a) Anti-Corruption Act No. 3 of 2012.
 - (b) Public Interest Disclosure (Protection of Whistle blowers) Act No. 4 of 2010.
 - (c) Public Procurement Act No. 8 of 2020, Public Procurement Regulations, No. 30 of 2022.
- C. Strategic and other documents on the Integrity Committee Programme functioning.
 - (a) Anti-Corruption Commission (ACC) Strategic Plans.
 - (b) Integrity Committee Anti-Corruption Prevention Annual Plans (ACPAPs).
 - (c) Integrity Committee Quarterly progress reports.
 - (d) 2023 Integrity Committee Chief Executive Forum report.
 - (e) 2015 Integrity Committee Programme Evaluation Report.
 - (f) 2021 Internal Integrity Committee Programme Evaluation Report.
 - (g) Transparency International Zambia - List of Support to Public Institutions.
- D. Integrity Committee guiding documents
 - (a) Guidelines on Integrity Committee Programme for Zambia (Revised 2021).
 - (b) Handbook for Integrity Committees on Corruption Prevention (2022).

2.2.2 Key Informant Interviews

Onsite semi-structured Key Informant Interviews (KIIs) were conducted, purposefully, in 42 institutions that were established between 2006 and December 31 2022³.

By public sector function, 13 of the target institutions are Local Government; 13, Public Service; and, 16 Quasi-Government⁴. Two Private Sector institutions were targeted (Konkola Copper Mines and Zambia Sugar PLC), but respondents were not available during the conduct of the Evaluation.

Table 1.0 below shows the establishment of Integrity Committees by period.

³ Appendix I.

⁴ Appendix II.

Table 1.0 Establishment of Integrity Committees by Period
Public Sector Function

Period Established	Local Government	Public Service	Quasi-Government	Grand Total
2006 - 2010	25.0%	37.5%	37.5%	100.0%
2011 - 2015	66.7%	0.0%	33.3%	100.0%
2016 - 2020	23.1%	53.8%	23.1%	100.0%
Post 2020*	0.0%	0.0%	100.0%	100.0%
Grand Total	31.0%	31.0%	38.1%	100.0%

The KIIs for the 2023 Programme evaluation were conducted in 13 districts. These are Chipata, Choma, Kabwe, Kalomo, Kasama, Kitwe, Livingstone, Luanshya, Lusaka, Mansa, Mazabuka, Ndola and Solwezi.

A total of 186 KIIs were administered. The KIIs were conducted in two institutions in each respective target district, other than Lusaka where 21 institutions were covered, due to the fact that the presence of Integrity Committees is the highest in the country, most institutions have their headquarters in the capital⁵.

The target groups for the KIIs were the Head of Institution/CEO; Integrity Committee member (Chairperson & Other); Staff (non-IC member); and Focal Point Persons. The latter being from Immigration Department in Livingstone; Road Transport and Safety Agency (RTSA), Ndola, Livingstone; and Zambia Revenue Authority (ZRA), Chipata, Livingstone, Ndola.

The distribution of the KIIs respondents is provided in Figure 1.0 below.

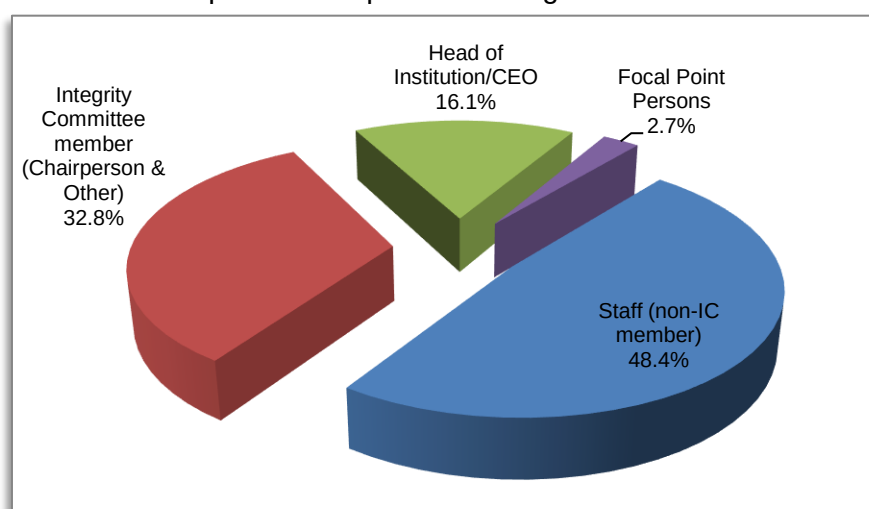


Figure 1.0 Distribution of KIIs Respondents

2.2.3 Focus Group Discussions

To acquire in-depth insights into the Programme, Focus Group Discussions were physically conducted with eight (8) Anti-Corruption Commission (ACC) Integrity Committee desk officers; and, virtually with the ACC Director Corruption Prevention, and one Assistant Director Corruption Prevention.

Insights on Programme implementation in terms of oversight were also solicited from the Secretary to Cabinet.

⁵ Appendix III.

2.2.4 Exit Polls

To assess public services users' perceptions and experiences of the Integrity Committee Programme, with respect to its relevance, effectiveness and impact, semi-structured Exit Polls⁶ were administered in 39 institutions, where KIIs were conducted.

Convenience sampling of at least 20 respondents in each of sample institution was used, and 816 respondents were captured⁷.

2.3 Data Analysis

Analysis of data constituted both quantitative and qualitative approaches, with narratives wherein relevant. Microsoft Excel Tables (cross tabulations) were used to disaggregate and triangulate the data so as to provide an empirical evidence base.

Disaggregation by public sector function and the period in which an Integrity Committee was established are used wherein variances in responses are observed, as a means of providing more insights.

2.4 Implementation of 2015 ICPE Recommendations

The objectives of the 2015 Integrity Committee Programme Evaluation (ICPE) were implementation of Integrity Committees; relevance of the Integrity Committee programme; effectiveness of the Integrity Committees; efficiency of the Integrity Committees⁸; impact of Integrity Committees; and, sustainability of Integrity Committees.

Assessment of the extent to which recommendations in the 2015 ICPE report were implemented by various institutions, interrogated whether the selected recommendations⁹ were:

- (a) Accepted and implemented;
- (b) Accepted but not implemented; rejected; and
- (c) The reasons, thereof.

The assessment also sought to establish whether in institutions that accepted and implemented a recommendation, there has been an evidenced and/or perceptual improvement in the institution's implementation of the Integrity Committee programme and its attendant interventions.

2.5 Limitations

The assessment of the implementation of the 2015 ICPE recommendations is constrained by use of selected recommendations, as some recommendations were not clear, and were repetitive.

Implementation of 2015 ICPE recommendations with respect to establishing whether in institutions that accepted and implemented a recommendation, there has been an evidenced and/or perceptual improvement in the institution's implementation of the Integrity Committee programme and its attendant interventions, could not be determined as the 2015 ICPE does not provide a sufficient baseline. This is due to the high non-comparability of the evaluation questions.

⁶ Appendix IV.

⁷ The Exit Polls sample; and, respondent demographic characteristics are provided in Appendix V and VI.

⁸ The assessment was not interrogated as the indicators in the 2015 Evaluation Report are not a measure of efficiency. There are a proxy measure of interventions like Service Delivery Charters and Customer Service Centres, and not the efficiency of the Integrity Committee Programme.

⁹ Some recommendations were not clear and/or were repetitive, hence the use of the term 'selected'. The selected recommendations interrogated are in Section 1 of the Key Informants Interview Data Collection Tool, provided in Appendix I.

3.0 Findings

3.1 The 2023 Integrity Committee Programme Evaluation

The sub-sections, hereunder, provide the findings of the 2023 Integrity Committee Programme evaluation assessed on the evaluation criteria of relevance; coherence; efficiency, effectiveness, impact, and sustainability.

3.1.1 Relevance

This section provides the findings on the relevance of the Programme objective and intended effects with respect to consistency with policy and law; suitability of design and implementation; relevance to the needs and priorities of Programme implementing institutions; consistency with priorities for Anti-Corruption in Programme implementing institutions; programme usefulness and valuableness of its Interventions; the activities and outputs consistency with intended impacts and effects; public perceptions on the Programme's relevance; and, the summary findings of relevance.

3.1.1.1 Policy and law

The assessment on whether the objectives of the Programme are consistent with policy and law considered the following:

- (a) Eighth National Development Plan (8NDP) 2022 - 2026;
- (b) National Anti-Corruption Policy (NACP);
- (c) Anti-Corruption Act No. 3 of 2012;
- (d) Public Interest Disclosure (Protection of Whistle blowers) Act No. 4 of 2010.
- (e) Public Procurement Act No. 8 of 2020 and, Public Procurement Regulations, No. 30 of 2022.

A. Eighth National Development Plan (8NDP) 2022 - 2026

Strategy 3, Strengthen transparency and accountability mechanisms (Development Outcome 1: Improved Policy and Governance) provides that:

"In the 8NDP period, the Government will scale-up interventions to promote transparency and accountability. To this effect, governance and investigative institutions, such as the Office of the Auditor-General and the Anti-Corruption Commission, will be capacitated to enhance transparency and accountability. In an effort to take services closer to the people, the Office of the Public Protector will be decentralised to provincial centres. This will be done to step up enforcement mechanisms for upholding principles of integrity among those charged with the responsibility to manage public resources and provide public services".

The intents of this policy deductively evidence alignment of the Integrity Committee Programme objective of enhancing transparency and accountability in the delivery of public services.

B. National Anti-Corruption Policy (NACP)

The Programme is pursuant to the 2009 National Anti-Corruption Policy (NACP)¹⁰. The Policy under institutional measures provides that *corruption prevention should be mainstreamed in the routine business of government agencies and the private sector by introducing Integrity Committees in public departments and at public points of service delivery*¹¹.

¹⁰ Extended pending the revised Policy.

¹¹ Republic of Zambia (2009). National Anti Corruption Policy 2009, p23.

In addition, the institutional arrangements of the Policy implementation framework state that, *“there will be instituted in every government agency Integrity Committees that will be responsible for internal corruption prevention, in order to ensure that individual organisations are responsible for corruption prevention in their respective organisations”*¹².

C. Anti-Corruption Act No. 3 of 2012

The Anti-Corruption Act No. 3 of 2012 stipulates in Section 6(1)(a) that the functions of the Commission are to *“prevent and take necessary and effective measures for the prevention of corruption in public and private bodies”*. The creation of Integrity Committees as one of such measure is provided for in Subsection (1)(a)(iv).

Section 6(1)(a)(iv) of the Act provides for the formation of committees such as Integrity Committees in Public and Private bodies to institutionalise corruption prevention in these institutions.

D. Public Interest Disclosure (Protection of Whistle blowers) Act No. 4 of 2010

This Act provides for, among others, the disclosure of conduct adverse to the public interest in the public and private sectors; procedures in terms of which employees in both the private and the public sectors may disclose information regarding unlawful or irregular conduct by their employers or other employees in the employ of their employers; and, a framework within which persons who make a public interest disclosure shall be protected.

The Act's consistency with Integrity Programme objectives of development, implementation and enforcement of the anti-corruption best practice policies, such as institutional Whistleblower Policies, is observable in Section 24 (1).

Section 24(1) provides that, a disclosure by a public officer shall be made to -

- (a) an investigating authority;
- (b) the principal officer of a government agency or investigating authority or other public officer of a government agency;
- (c) another officer of the government agency or investigating authority to which the public officer belongs; or
- (d) an officer of the government agency or investigating authority to which the disclosure relates; in accordance with any procedure established by the authority concerned for the reporting of allegations of corrupt conduct, malpractices or serious and substantial waste of public money by that authority or any of its officers.

Notable, however is that the Act does not provide for disclosure from members of the public to internal corrupt conduct and malpractices reporting mechanisms such as Integrity Committees. Section 11 (Making public interest disclosure) and 23 (Lodging of public interest disclosure) are categorical as to who may receive the disclosure.

Section 11 (1) provides that – *“Any person may make a public interest disclosure to an investigating authority”*. The Act defines an investigating authority as - (a) the Auditor-General; (b) the Anti-Corruption Commission; (c) the Drug Enforcement Commission; (d) the Investigator-General; (e) the Police Public Complaints Authority; (f) the Judicial Complaints Authority; or (g) any other person or body prescribed under this Act or any other law.

The foregoing exceptions in the Public Interest Disclosure (Protection of Whistle blowers) Act evidence that Integrity Committee Programme, are consistent with the role of Integrity Committees. This is because the 2022 Handbook for Integrity Committees on Corruption Prevention provides that the Committees should receive complaints on unethical conduct, maladministration and poor service delivery from within and outside the organisation, except for complaints outside the Committees' competencies; and in particular that they should not handle complaints of a criminal nature.

¹² Ibid, p26.

E. Public Procurement Act No. 8 of 2020

The Public Procurement Act No 8 of 2020 Act seeks to enhance transparency, efficiency, effectiveness, economy, value for money, competition and accountability in public procurement; regulate and control practices relating to public procurement in order to promote the integrity of, fairness and public confidence in, the procurement process; promote the participation of citizens in public procurement.

The Act's consistency with the Integrity Programme is evident in the Public Procurement Regulations No. 30 of 2022 under the Act. Regulation 250 (Regulation Exercise of policy functions) sub-Regulation (1) provides that:

"The Authority shall, in the exercise of the policy functions of the Authority as specified under the Act, ensure that public procurement policy, systems and procedures are consistent with the fundamental principles under regulation 6 and integrated with other relevant Government policies, systems and procedures, including those for - (c) anti-corruption initiatives".

3.1.1.2 Suitability of Design and implementation

The findings on the extent to which Programme design and implementation suitability¹³ in mainstreaming corruption prevention in the routine business of the institutions, of the total number of 186 respondents is that it is to a *very large extent* and *large extent*, 23.7% and 44.6% respectively (Figure 2.0).

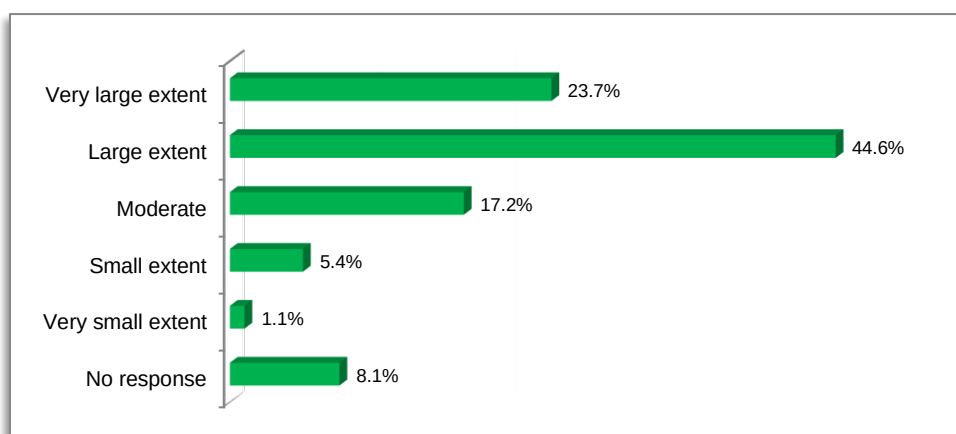


Figure 2.0 Programme Design and Implementation Suitability

Respondents that indicated *very small extent* and *small extent*, and provided a reason, in **verbatim** stated that:

- (a) In terms of structure, the IC is headed by a senior member of the management team. However, the IC Secretariat in charge of the day to day operations is headed by a Coordinator, which is a lower position. This, therefore, means that he cannot do or say anything to the contrary as he pays allegiance to those that employed him. It further means that issues of integrity are likely to be compromised when it comes to the implementation of IC and financial prudence.
- (b) The program implementation has just started and we are yet to roll out and there is no budget line.

¹³ That is, structure, membership criteria, roles and responsibilities.

The extent to which Programme design and implementation is suitable in mainstreaming corruption prevention in the institutions does not evidence significant variances when the institutions are disaggregated by public sector function.

However, although the dominant Likert Scale rating is *large extent*, it is notable that in Quasi-Government institutions ratings of *very large extent* and *large extent* are comparatively lower; while ratings of *moderate*, *small extent* and *very small extent* are comparatively higher (Figure 3.0).

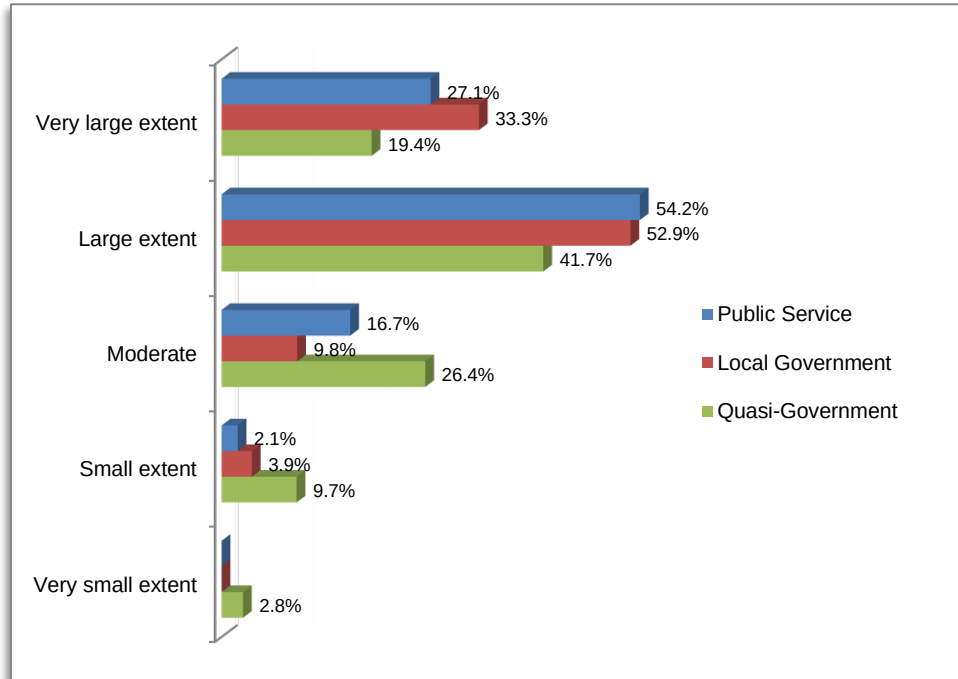


Figure 3.0 Design and Implementation Suitability – Public Sector Function

Further, Programme design and implementation suitability considered with respect to the period in which an Integrity Committee was established shows that the dominant Likert Scale rating is *large extent*, and a notable *very small extent* in institutions where an Integrity Committee was established post 2020 (Figure 4.0).

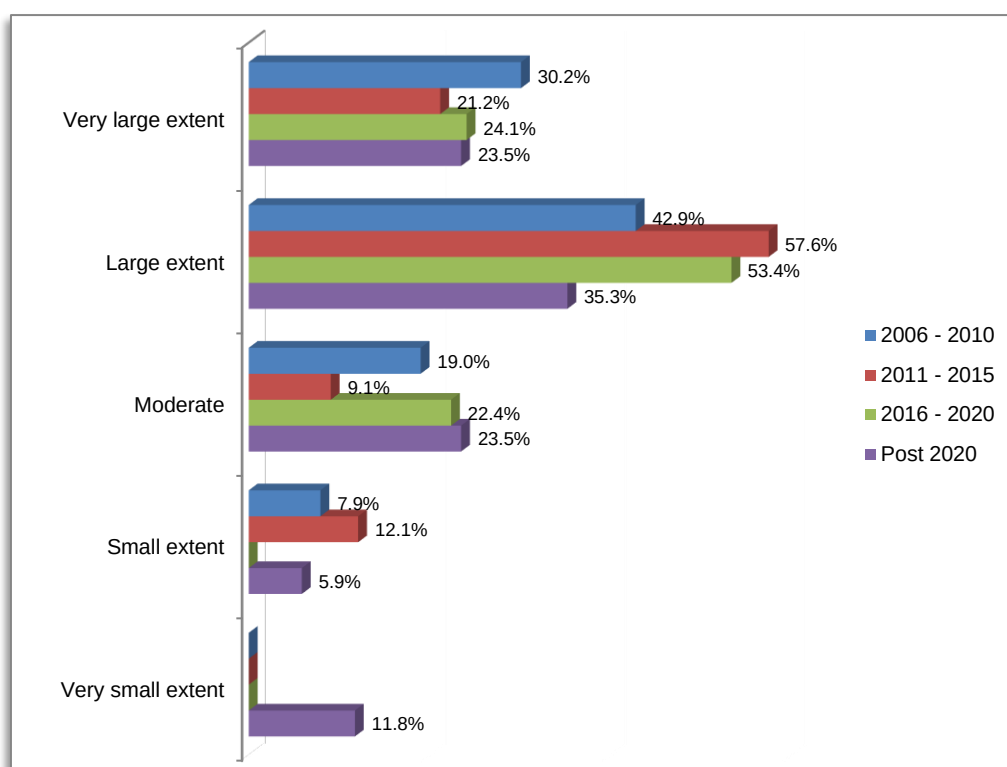


Figure 4.0 Design and Implementation Suitability – Period Established

3.1.1.3 Needs and priorities of Anti-Corruption

The priorities and needs of Anti-Corruption in Programme implementing institutions are, in the main, development, implementation and enforcement of anti-corruption best practices.

Respondents' opinion on the extent to which the objectives of the Programme are relevant to the corruption prevention needs and priorities of Programme implementing institutions is established to mostly be to a *very large extent* and *large extent*, 25.8% and 51.6% respectively (Figure 5.0).

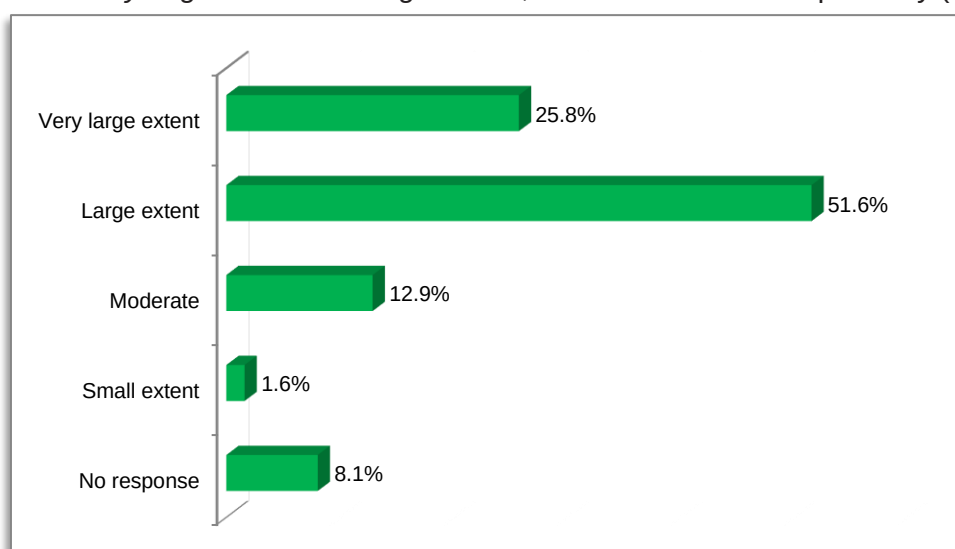


Figure 5.0 Relevance to Needs and Priorities of Institutions

While on the extent to which the objectives are consistent with the priorities for Anti-corruption in the institution, 27.4% of the respondents indicated to a *very large extent*; and 48.9% *large extent*, as shown in Figure 6.0 below.

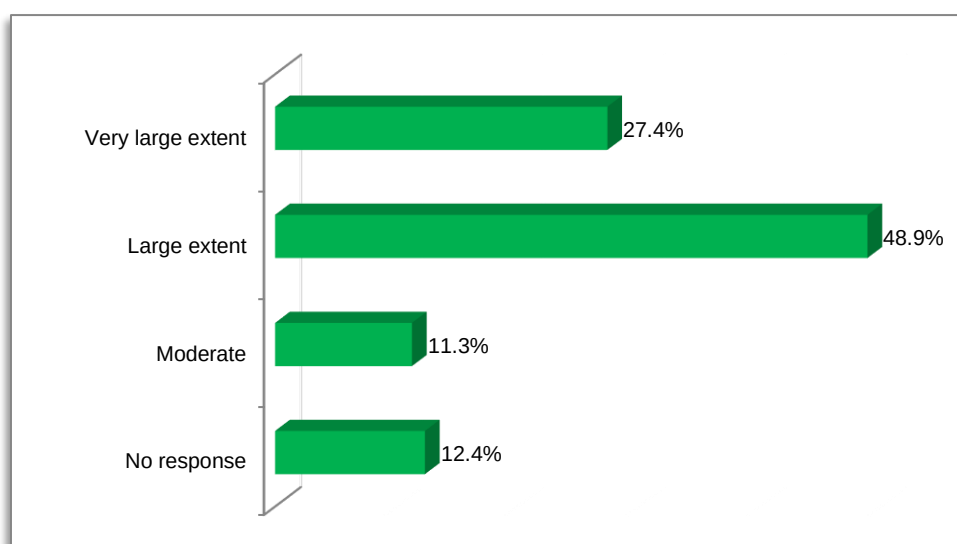


Figure 6.0 Consistency with Priorities for Anti-Corruption in institutions

3.1.1.4 Usefulness and value of Programme interventions

On the usefulness and valuableness of the Integrity Committee Programme interventions, 56.5% of the Key Informant respondents *strongly agree*; and 38.7%, *agree* (Table 2.0).

Table 2.0 Usefulness and Value of Programme Interventions

Rating	No. of Respondents	Relative
Strongly agree	107	57.5%
Agree	70	37.6%
Neither agree nor disagree	4	2.2%
No response	5	2.7%
Grand Total	186	100.0%

3.1.1.5 Activities and outputs

The most frequent finding on the extent to which the activities and outputs of the IC Programme, like customer service centres, service delivery charters, complaints handling mechanisms, are consistent with the overall goal and the attainment of its objectives is to a *very large extent* and *large extent*, 26.3% and 48.9% respectively (Figure 7.0).

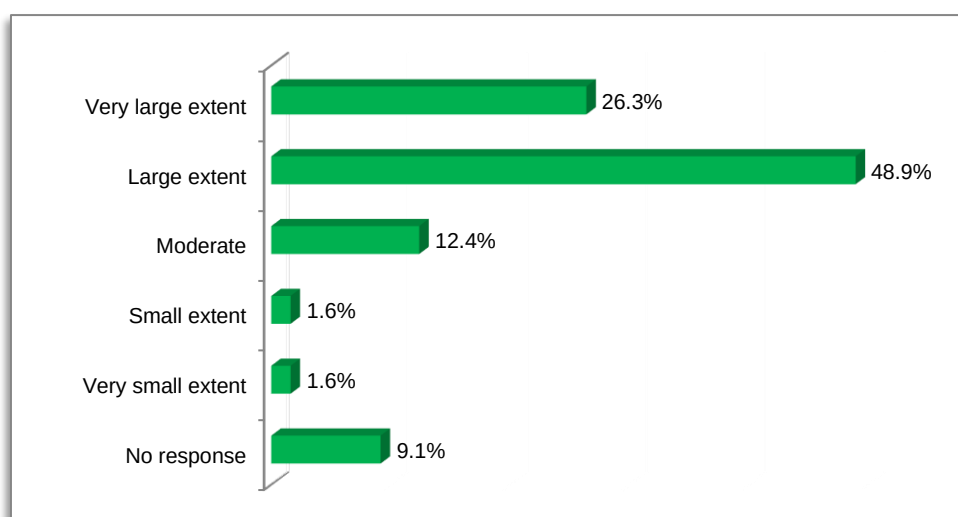


Figure 7.0 Activities and Outputs Consistency with Programme Goal

In addition, Figure 8.0 below shows that the Evaluation established that consistency of the activities and outputs of the ICs with the intended impacts and effects, like awareness of where to report cases of unethical conduct/ corruption in the institution, is mostly *always* (40.9%) and *often* (31.7%).

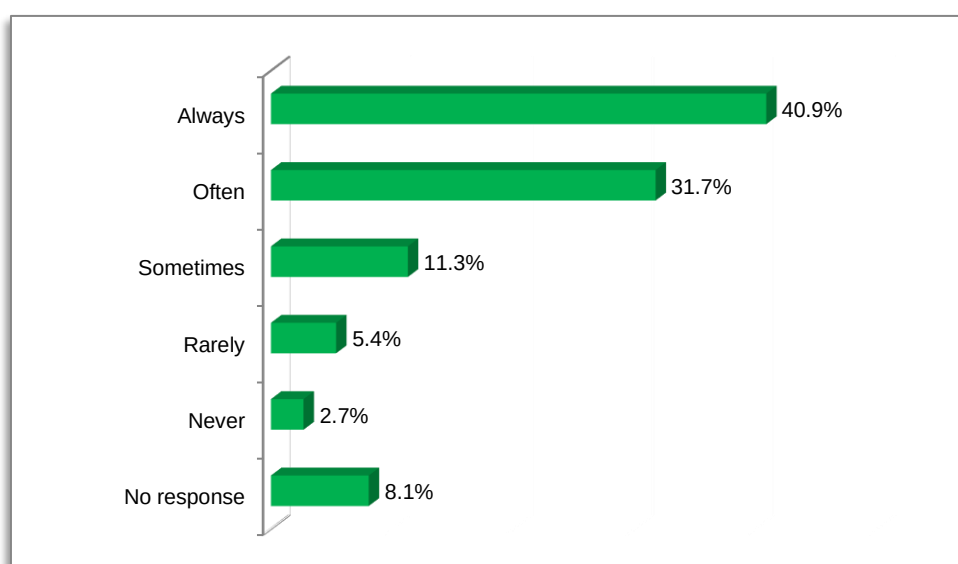


Figure 8.0 Activities and Outputs Consistency with Impacts and Effects

3.1.1.6 Public perceptions

The relevance of the Programme from a public perspective was interrogated with respect to whether Integrity Committees are useful and valuable. Of 224 Exit Polls respondents that are aware of the existence of Integrity Committees¹⁴, 40.2% responded to the question whether Integrity Committees are useful and valuable. The findings are that 43.3% *strongly agree*; 46.7%, *agree*; 8.9%, *neither agree nor disagree*; and, 1.1%, *disagree*.

¹⁴ See Section 3.1.4.5, Public perceptions and experiences.

3.1.2 Coherence

This section provides the findings on whether the Programme interventions are aligned with other interventions implemented in the institution, specifically internal coherence¹⁵.

The section covers Programme compatibility and synergies; complementarity, harmonisation and co-ordination; IC peripheral perspective; Programme interventions value addition; Programme seamlessness; and, the summary findings of coherence.

3.1.2.1 Compatibility and synergies

Internal coherence, with respect to the extent to which the Programme interventions are compatible with other public service delivery interventions in the respective institutions, is that 24.7% of the respondents indicate that it is the case to a *very large extent*; 39.2%, *large extent*; 19.9%, *moderate*; 1.6%, *small extent*; 2.2%, *very small extent*; and 12.4% *no response* (Figure 9.0).

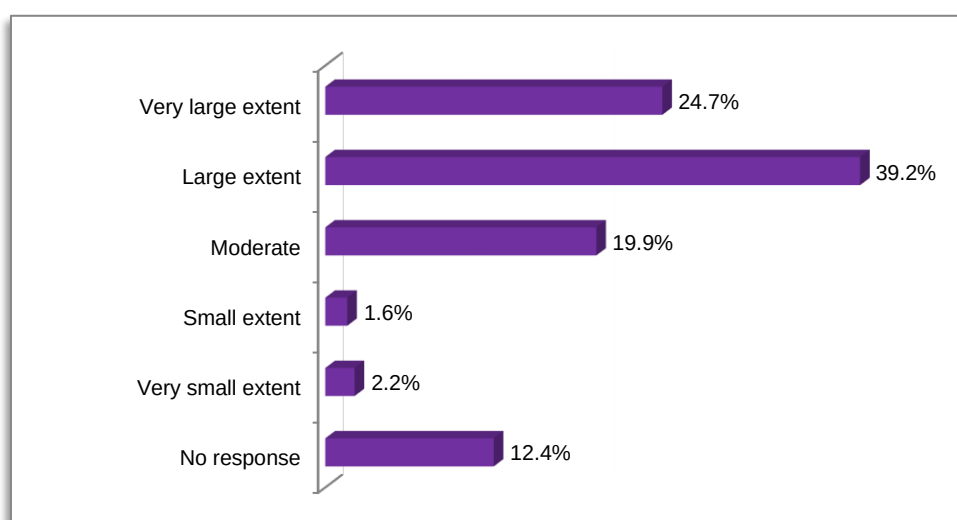


Figure 9.0 Programme Interventions Compatibility

Reasons provided for *small extent* and *very small extent*, in verbatim, are:

- IC has not been integrated/ not introduced to members of staff/ not officially launched.
- Infancy stage/awareness activities required.
- Lack of zeal and continuity.
- The executors do not consult each other.
- There is frustration from other public delivery institutions within the organization.
- There is no compatibility with others such as audit and no action appears to be taken against the culprits.
- There is no knowledge of the existence of the IC.

Further, 70.2% of the respondents indicated that there are synergies and interlinkages between the Programme interventions and other public service delivery interventions carried out in the institutions; and 13.1% that there are no synergies and interlinkages.

3.1.2.2 Complementarity¹⁶, harmonisation and co-ordination

Twenty-seven point four percent (27.4%) of the respondents noted that the extent to which there is complementarity of IC interventions with other public service delivery interventions in the

¹⁵ Most frequent other intervention provided is cashless payments at points of service delivery.

¹⁶ A relation of mutual dependence or action or influence.

institutions exists to a *very large extent*; *large extent*, 39.2%; *moderate* 10.8%; *small extent* 5.4%; *very small extent* 4.8%; and 12.4% *no response* as shown in Figure 10.0 below.

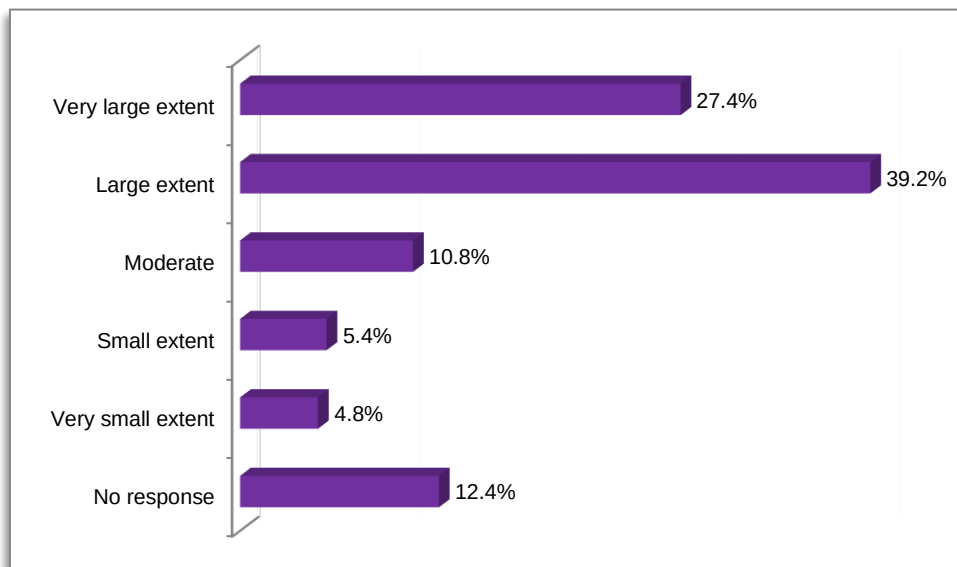


Figure 10.0 Programme Interventions Complementarity

With respect to the extent of harmonisation of Programme interventions with other public service delivery interventions in the institutions, 19.4% noted to a *very large extent*; 45.2%, *large extent*; 13.4%, *moderate*; 5.4%, *small extent*; and 4.3%, *very small extent* (Figure 11.0).

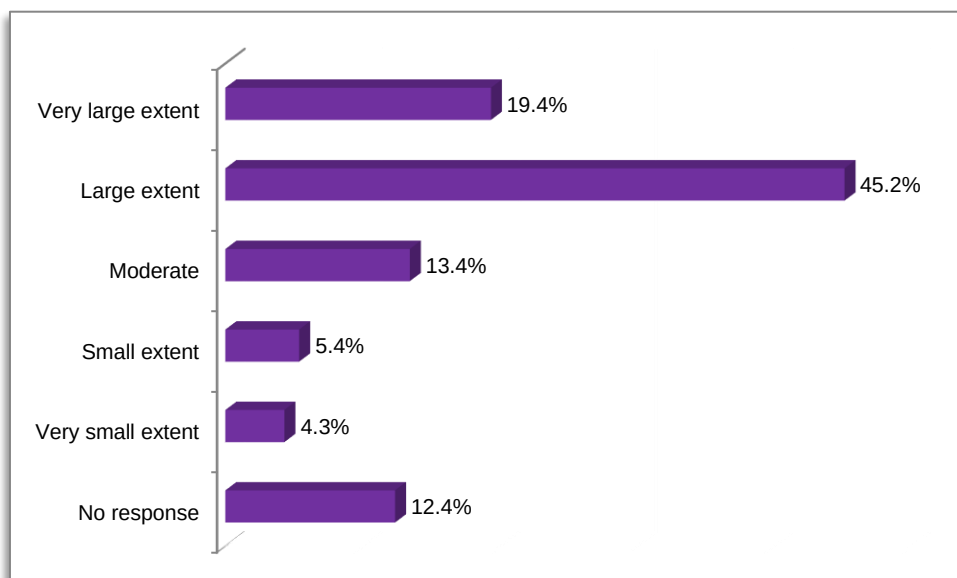


Figure 11.0 Programme Interventions Harmonisation

And lastly, on extent of co-ordination of Programme interventions with other public service delivery interventions in the institutions, 17.2% noted to a *very large extent*; 44.6%, *large extent*; 15.1%, *moderate*; 5.9%, *small extent*; and 5.4%, *very small extent* (Figure 12.0).

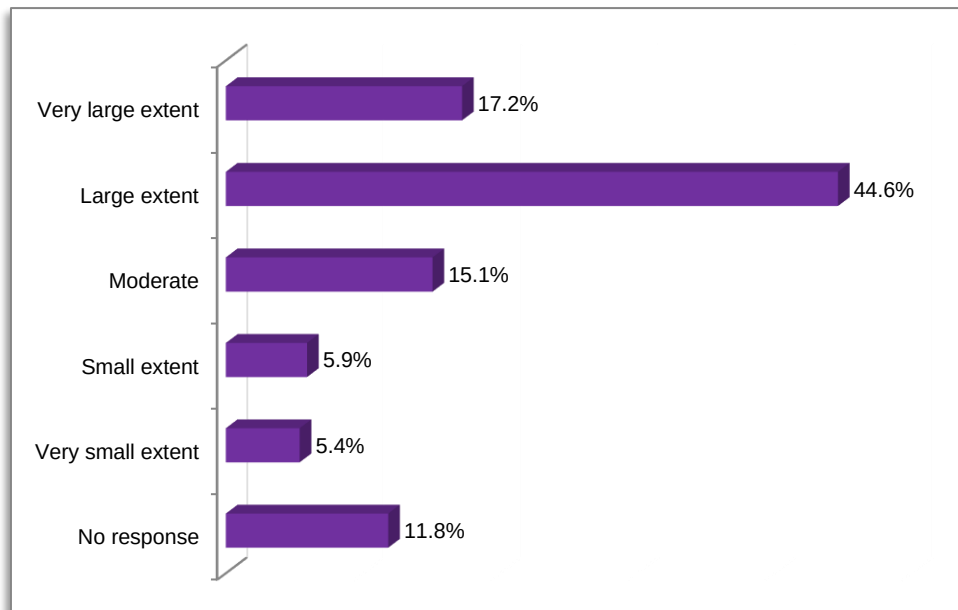


Figure 12.0 Programme Interventions Co-ordination

3.1.2.3 IC Peripheral perspective

The findings on whether the Integrity Committee Programme in the institutions have a peripheral (unimportant) perspective (that is it is not institution centric), is that 15.1% said to a *very large extent*; 10.8%, *large extent*; 15.1%, *moderate*; 18.8%, *small extent*; and 31.7%, *very small extent* (Figure 13.0).

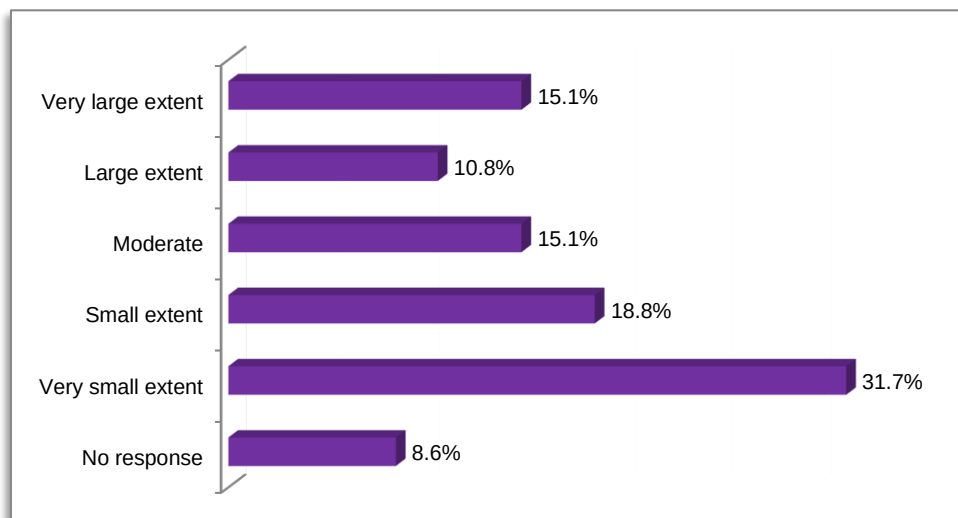


Figure 13.0 IC Peripheral Perspective

The reasons that the Programme has a peripheral (unimportant) perspective, which is the response to a *very large extent* and *large extent*, are provided in Table 3.0 and Figure 14.0 below.

Table 3.0 IC Peripheral Perspective Reason

Reason	No. of Responses	Relative
Low awareness of IC in Institution	10	26.3%
IC is ineffectual	8	21.1%
IC membership is added responsibility/ad hoc	8	21.1%
IC belongs to the ACC/It is an imposition	6	15.8%
IC is being reconstituted	4	10.5%
Membership volatility/high staff turnover	2	5.3%
Grand Total	38	100.0%

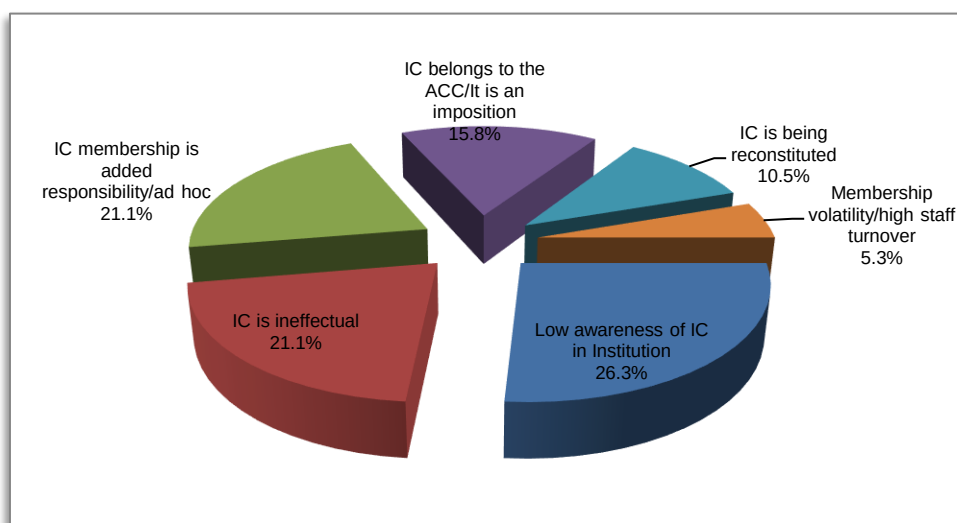


Figure 14.0 IC Peripheral Perspective Reason

Table 3.0 and Figure 14.0 above show that the most cited reasons as to why the Programme has a peripheral (unimportant) perspective are low awareness of IC in the institutions; that the IC is ineffectual; and that, IC membership is an added responsibility (ad hoc).

Noteworthy is that of the 48 respondents that noted that the IC is peripheral in their institution, 7 (14.6%) were Head of the Institution or CEO; 21 (43.8%), Integrity Committee members; 18 (37.5%), non-IC members; and 2 (4.2%), Focal Point Persons.

Further, the extent to which the Programme has a peripheral (unimportant) perspective evidences a significant variance when the institutions are disaggregated by public sector function. Figure 15.0 below shows that the Integrity Committee Programme in Local Government institutions has the most peripheral (unimportant) perspective (29.6%).

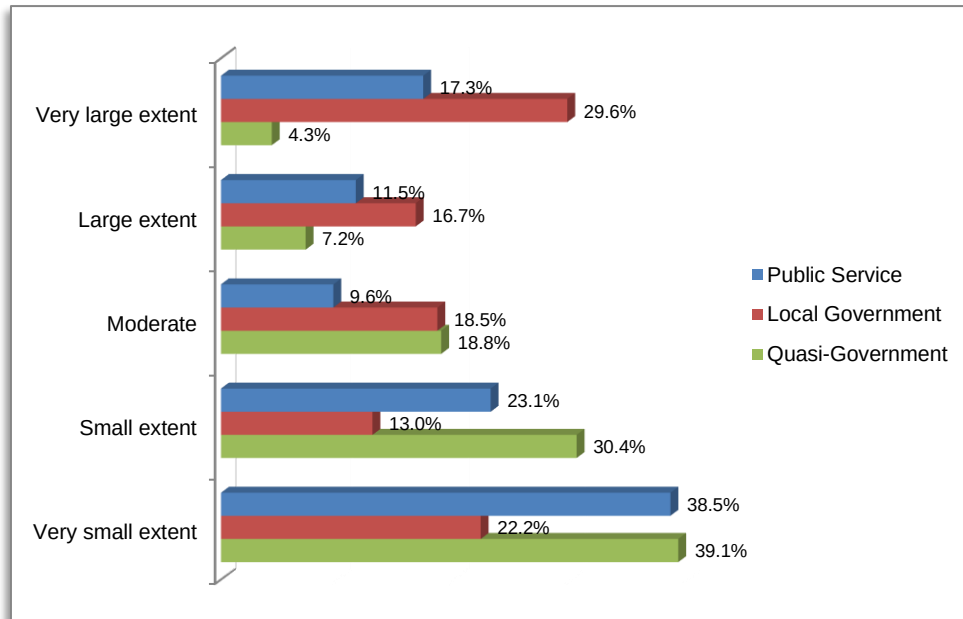


Figure 15.0 IC Peripheral Perspective – Public Sector Function

3.1.2.4 Interventions value addition

Of the 186 respondents, 15.1% indicated that the extent to which the Integrity Committee Programme interventions add value to the institution's work process, while avoiding duplication of effort and conflicts, is to a *very large extent*; and, 31.7% to a *large extent* (Figure 16.0).

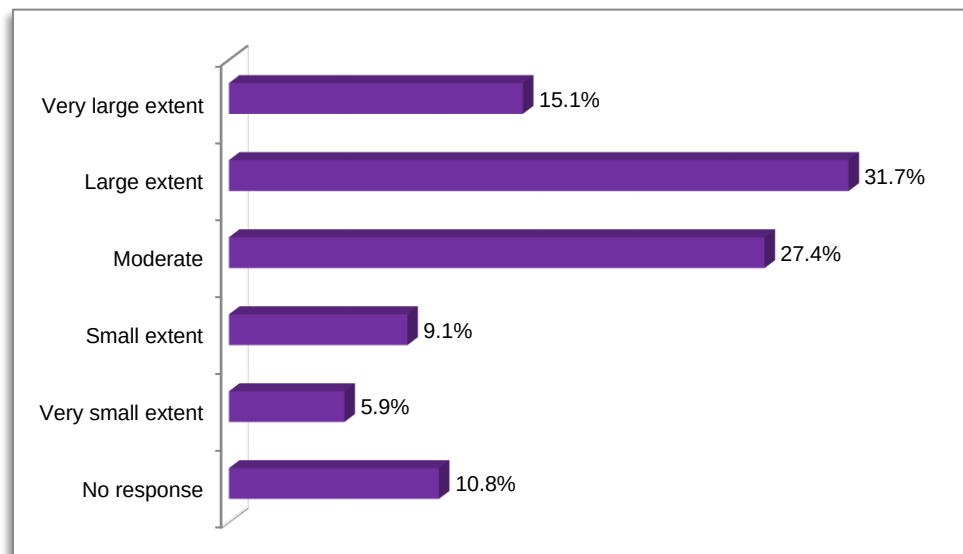


Figure 16.0 Programme Interventions Value Addition

Table 4.0 and Figure 17.0 below provide the findings on why respondents indicated that the Programme adds value. The most frequent are adherence to integrity and ethical standards, 32.3%; deterrence effect on bribery and malpractices, 24.2%; and, enhancing transparency and accountability in public service delivery, 19.4%.

Table 4.0 Interventions Value Addition Reason

Reason	No. of Responses	Relative
Ensures adherence to integrity and ethical standards	20	32.3%
Existence of IC has bribery/malpractice deterrence effect	15	24.2%
Enhances transparency and accountability in public service delivery	12	19.4%
Creates awareness of corruption	8	12.9%
Contributes to corruption prevention in institution	5	8.1%
Enhances malpractice/bribery reporting in the institution	2	3.2%
Grand Total	62	100.0%

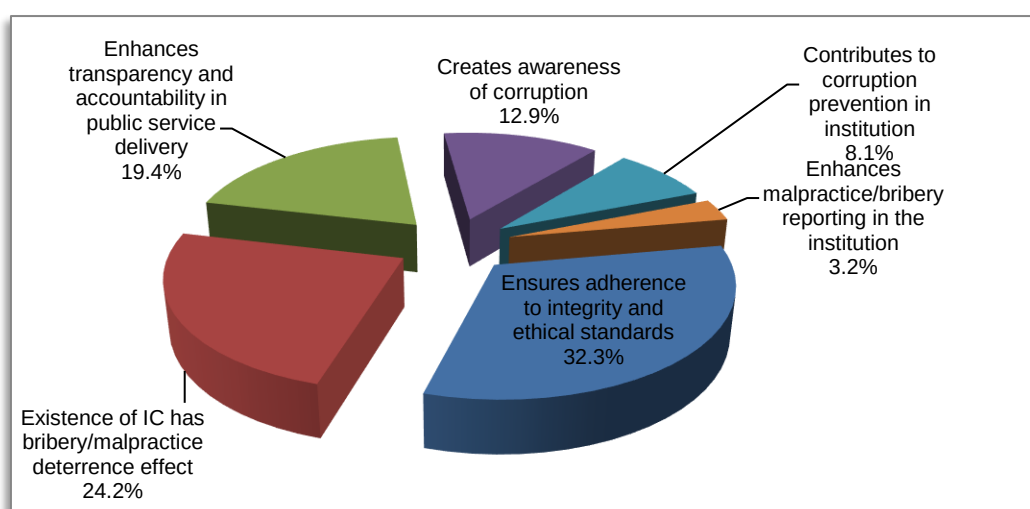


Figure 17.0 Interventions Value Addition Reason

3.1.2.5 Programme seamlessness

The Evaluation findings on whether the objectives of the IC Programme are seamless (corresponding in size, degree or extent and having no due demands) with the institutional capacity conditions are that 71.0% of the respondents agree that it is; and 11.3%, do not (Table 5.0).

Table 5.0 Programme Seamlessness

Rating	No. of Respondents	Relative
Programme is seamless	132	71.0%
It is not	21	11.3%
No response	33	17.7%
Grand Total	186	100.0%

Further, that the Programme is an added responsibility and demand on human resources (65.0%) is the most dominant reason as to why it is not are seamless with the institutional capacity conditions, as shown in Table 6.0 below.

Table 6.0 Programme Non-Seamlessness

Reason	No. of Responses	Relative
Added responsibility/demand on human resources	13	65.0%
Demand on fiscal resources/budget constraints	3	15.0%
IC being setup	2	10.0%
Need to devolve to lower levels	1	5.0%
Objectives should be individual institution-specific	1	5.0%
Grand Total	20	100.0%

3.1.3 Efficiency

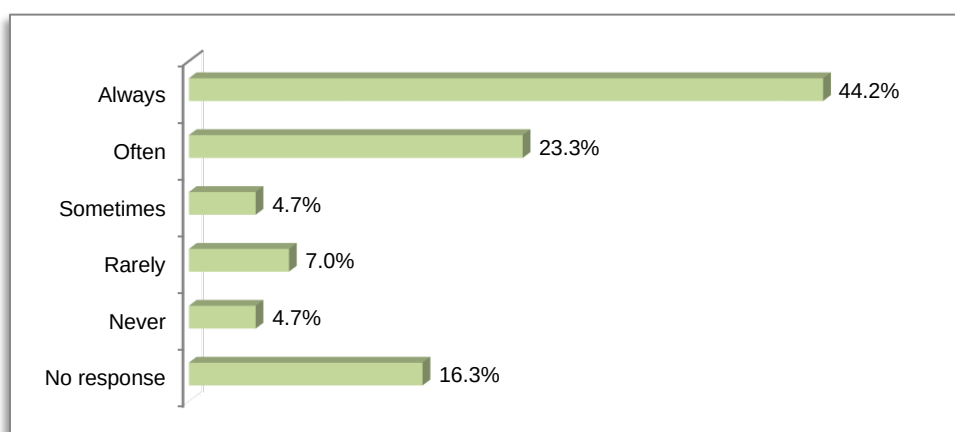
This section provides the findings on the extent to which the Programme interventions delivered, or likely delivered, intended results in a cost-effective manner.

The section covers use of Integrity Committee allocated funds; cost effectiveness of Programme interventions; and, summary findings of efficiency.

3.1.3.1 Use of allocated funds

In the Integrity Committee Guideline of 2021, one of the roles of the Chief Executive Officer (CEO) is to ensure that the Committees budget is supported and funded. Thence, the evaluation sub-question of whether funds allocated to the Integrity Committee are used for the intended interventions or purpose is based on the assumption that wherein an institution submitted an Annual Corruption Prevention Action Plan (ACPAP), then there were dedicated Programme funds¹⁷.

The Evaluation established the most frequent response is that funds allocated to the Integrity Committee are *always* used for the intended interventions or purpose (44.2%) as shown in Figure 18.0 below.

**Figure 18.0 Use of Allocated Funds**

That it is *rarely* or *never*, the case was attributed to, in verbatim:

- (a) IC in progress.
- (b) Not enough funding
- (c) The committee has not been existing.

¹⁷ Total number of responses, thereof, is 43.

- (d) The department has had no adequate resources to implement IC activities despite the institution having provided a budget line for the IC. This has led to none implementation of IC planned interventions.

3.1.3.2 Cost effectiveness of Programme interventions

The percent number of responses with respect to the extent to which the cost of the Integrity Committee Programme services or activities is reasonable in relation to the benefits is to a *very large extent* 36.4%; *large extent* 54.5%; and *moderate* 9.1%.

With respect to whether the introduction of the Integrity Committee Programme is the most cost-effective way of fighting corruption in public and private institutions compared to other alternatives, 46.5% *strongly agree*; 39.5%, *agree*; 11.6%, *Neither agree nor disagree*; and 2.3% did not respond to the question (Figure 19.0).

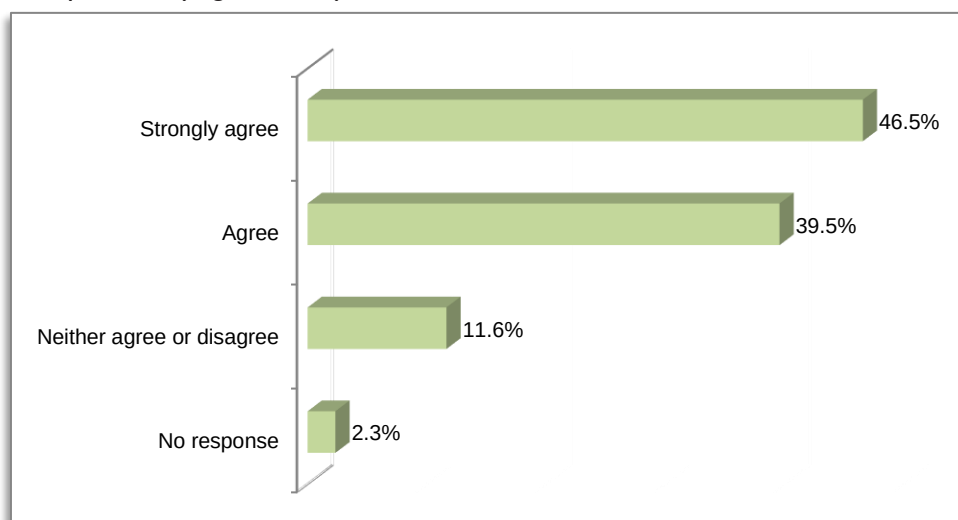


Figure 19.0 Programme Cost-Effectiveness

3.1.4 Effectiveness

This section provides the findings on the extent to which Integrity Committee Programme interventions have produced the desired results.

The section covers Integrity Committee planning and reporting; key anti-corruption interventions introduced to date; type of key interventions; process effectiveness; public perceptions and experiences; and, summary findings of effectiveness.

3.1.4.1 Planning and reporting

Integrity Committees planning and reporting comprises development of Annual Corruption Prevention Action Plan (ACPAP) and Quarterly Progress Reports (QPR); and their submission to the Anti-Corruption Commission (ACC), thereof. An ACPAP is a schedule of activities with budget lines that an institution with an Integrity Committee plans to undertake in a given year.

A comparative analysis on the development of ACPAPs and QPRs and their submission to the ACC, considered a decadal interval of Evaluation target Integrity Committees that existed by 2012; and all those covered in the Evaluation established up to December 2022.

Among the 19 Integrity Committees that existed by 2012, 42.1% and 31.6% had submitted ACPAPs and QPRs respectively (Table 7.0). Table 7.0 also shows that in 2022, 42.9% had submitted ACPAPs; and 31.0%, QPRs.

Table 7.0 Planning and Reporting

Reporting Status	2012				2022			
	ACPAP	% ACPAP	QPR	%QPR	ACPAP	% ACPAP	QPR	%QPR
Submitted	8	42.1%	6	31.6%	18	42.9%	13	31.0%
Not Submitted	11	57.9%	13	68.4%	24	57.1%	29	69.0%
Grand Total	19	100.0%	19	100.0%	42	100.0%	42	100.0%

Further, 6 of the Evaluation target Integrity Committees that existed by 2012 are in Public Service institutions; 6, Local Government; and 7, Quasi Government¹⁸. Figure 20.0 below shows that planning and reporting is comparatively higher in Quasi Government institutions than in Public Service and Local Government institutions.

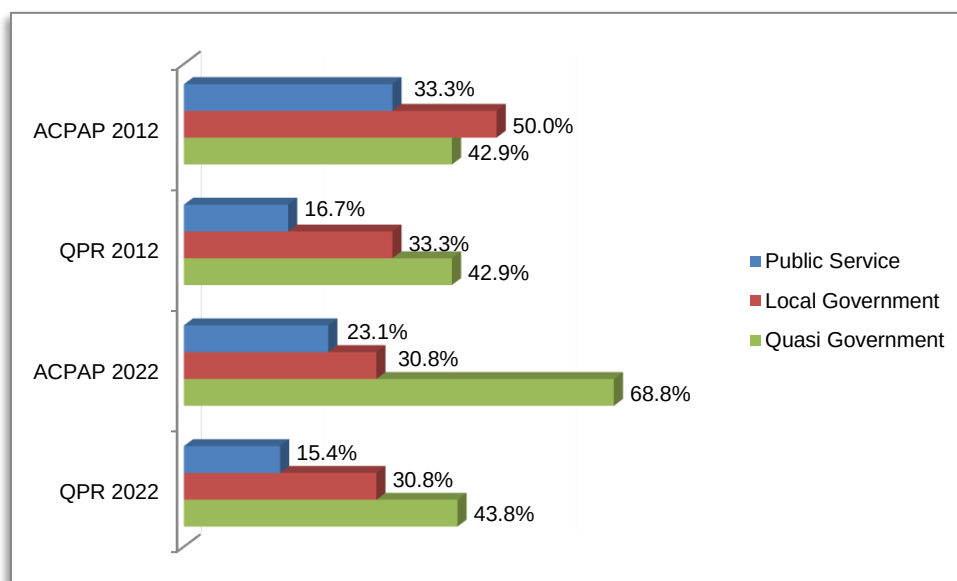


Figure 20.0 Planning and Reporting – Public Function

In addition, comparatively, the 2021 Integrity Programme internal evaluation Report shows that in 2020 only 32 out of 116 ICs (28%) submitted ACPAPs to ACC while 84 (72%) did not.

The reasons provided are:

- Insufficient Permanent Secretaries/ CEOs, Chairpersons and IC members adherence to development and submission of ACPAPs;
- Competing tasks for IC members (as they had “to attend to their main jobs”);
- Lack of financial resources for IC activities;
- Changes in the IC membership due to high IC member turnover; and,
- Impact of Covid-19.

¹⁸ 2022 sample was 42, 13 ICs - Public Service; 13 - Local Government; and 16, Quasi Government as provided in Section 2.2.2.

3.1.4.2 Key AC interventions introduced¹⁹

The key interventions considered in the Evaluation are Service Delivery Charters; Codes of Ethics; Codes of Conduct; Conflict of Interest Policies; Whistleblower Policies; and, Gifts and Benefits Policies.

Introduction of any key interventions intended to result in or have a striking effect on the reduction of corruption and malpractices in the institutions by Integrity Committees is observed in 92.9% of the 42 target institutions.

Table 8.0 below shows that only target Integrity Committee established in the period 2011 to 2015 have all introduced some form of key interventions.

Table 8.0 Introduction of Interventions by Period Established

Period Established	Introduced Interventions	Did not	Grand Total
2006 - 2010	14	2	16
2011 - 2015	9		9
2016 - 2020	12	1	13
Post 2020	4		4
Grand Total	39	3	42

3.1.4.3 Type of AC interventions

Service delivery charters are the most introduced type of anti-corruption intervention intended to result in the reduction of corruption and malpractices as a percent of the total number of institutions (83.3%); and Conflict of Interest Policies, the least (40.5%) as shown in Figure 21.0.

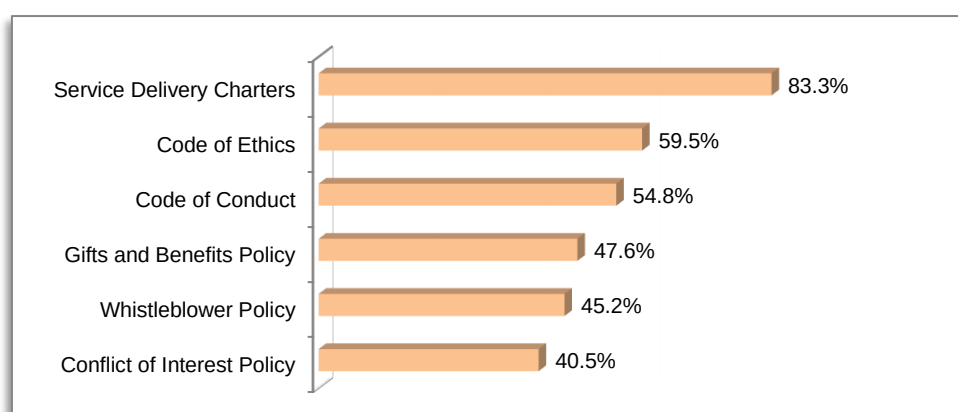


Figure 21.0 Type of AC Interventions Introduced

Introduction of Citizens' charters, is observed in Chambeshi Water Supply and Sanitation Company; Lukanga Water and Sanitation Company; and, Lusaka City Council. Citizen's charters in these institutions were introduced through support from Transparency International - Zambia as part of strategic focus area on People Engagement and Advocacy Strategic.

The charters are Process flow charts on how citizens can demand for clean and safe water as well as how to report suspected corruption and mal administration.

¹⁹ Assessment of key anti-corruption interventions introduced is based on that assumption that where all IC member respondents in an institution agreed (in majority), then it is verifiable information. However, the responses were further triangulated with internet search findings.

Disaggregated by public service function, variations are observed in the type of Interventions Introduced. Figure 22.0 below shows that within the different categories of institutions, only the introduction of Service delivery charters evidences a smaller variance from the overall percentage introduction of the intervention, when compared to the other interventions.

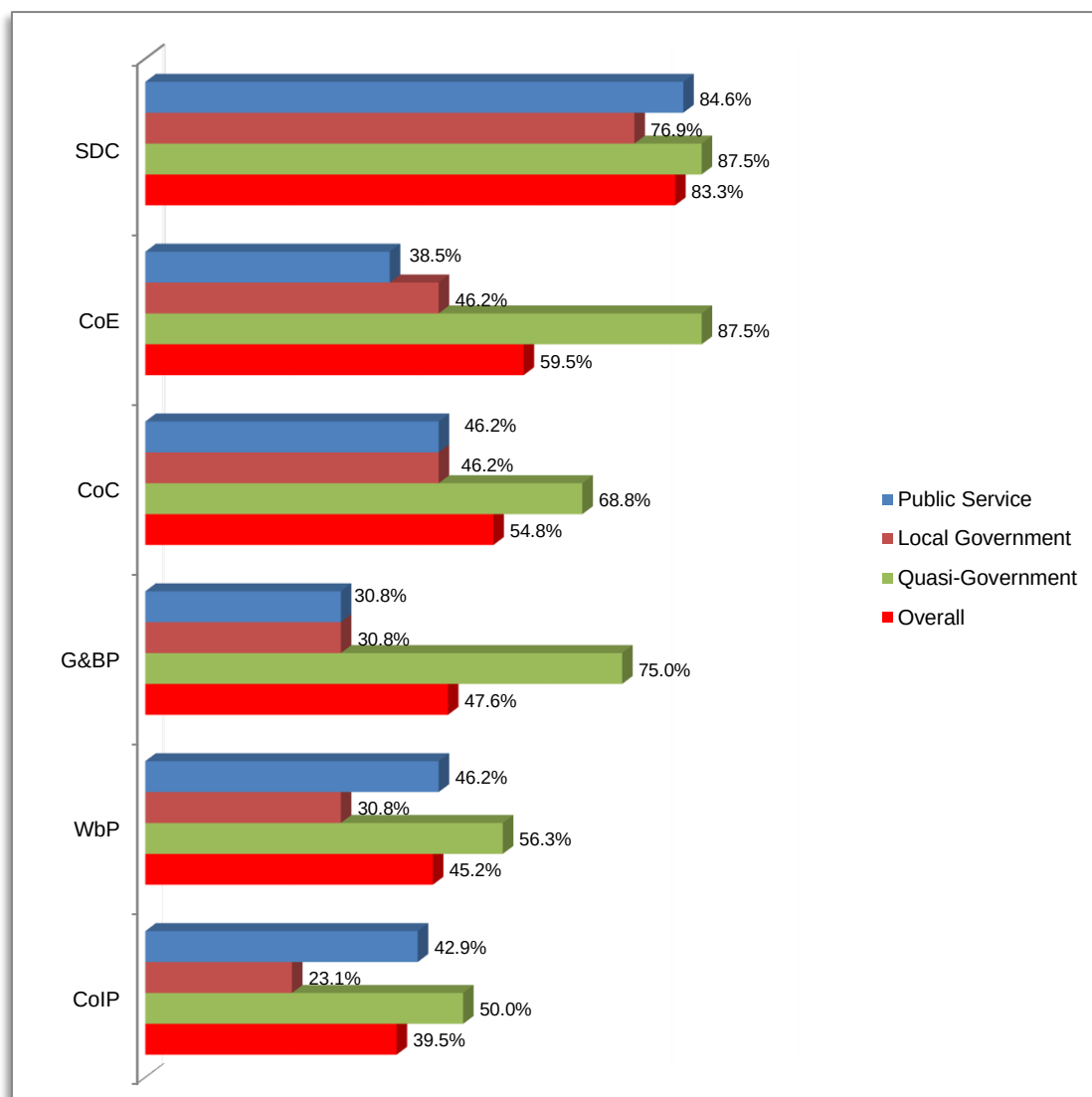


Figure 22.0 Type of AC Interventions - Public Service Function

(SDC denotes Service Delivery Charters; CoE, Code of Ethics; CoC, Code of Conduct; G&BP, Gifts and Benefits Policy; WbP, Whistleblower Policy; CoIP, Conflict of Interest Policy.)

Figure 22.0 shows significant variances from the overall percentage with respect to introduction of the Code of Ethics; Code of Conduct; Gifts and Benefits Policy; Whistleblower Policy; and, Conflict of Interest Policy. Notable is that Quasi-Government institutions comparatively have higher percentage introduction of the interventions intended to result in the reduction of corruption and malpractices.

With respect to development of mechanisms for receiving and providing redress on complaints emanating from within and outside the organisation relating to ethical issues and hindrances to efficient and effective service delivery, 62.8% of the Integrity Committees in the target institutions observed that they have done so; and 32.6% have not; and 2.3% did not respond.

Customer Service Centres are indicated in 52.4% of the institutions; and Complaints Handling Systems in 60.5%. One institution mentioned suggestion box as a mechanism developed.

3.1.4.4 Process effectiveness

Process effectiveness is a measure of a Programme process's ability to produce the desired results or effect. Interrogation of process effectiveness considers whether there are aspects of the Programme that could have been done differently.

Of 97 specifically targeted respondents²⁰, 14.4% indicated that there are aspects of the Programme that could have been done differently; 67.0% said no; and 18.6% did not respond to the question.

With respect to individual institutions, Programme activities which were done differently, to ensure process effectiveness, are shown in Table 9.0 below.

Table 9.0 Activities Done Differently

Activity	No. of Institutions
Engaged full time staff	5 ²¹
Established IC Desk Office	6 ²²
Scaled up training and support	3 ²³
Broadened IC membership*	1 ²⁴
Enhanced awareness/prudent use of resources	1 ²⁵
Total	16

* IC membership broadened to include workplace units not represented in the IC

3.1.4.5 Public perceptions and experiences

This sub-section provides the Evaluation findings on the Programme effectiveness of interventions that Integrity Committees introduced to reduce corruption and malpractices in the institutions; and, mechanisms developed for receiving and providing redress on all complaints.

The section covers awareness of Integrity Committees; user knowledge of Integrity Committee in institutions they sought a service from; their service delivery experiences; knowledge of existence of Service delivery charters; experiences of service provision improvement; Customer Service Centre helpfulness; and, the summary findings of effectiveness based on Likert Scale responses.

A. Awareness of Integrity Committees

The Evaluation findings on awareness of Integrity Committees are that of the 816 Exit Polls respondents, 27.5% (224) are aware or have heard of the committees; 72.2% are not aware nor have they heard of Integrity committees; and 0.4% did not respond (Figure 23.0).

²⁰ Only responses by Head of Institution/CEO, Integrity Committee member (Chairperson & Other) and Focal Point Persons are used in the sub-sections 3.1.4.3 Process effectiveness; and, 3.1.4.5 Programme capacity building.

²¹ Higher Education Loans and Scholarships Board (HELSB); National Registration, Passports and Citizenship - NRC; Patent And Company Registration Agency (PACRA); Public Service Pension Fund (PSPF).

²² National Institute of Public Administration (NIPA); National Registration, Passports and Citizenship - NRC; National Road Fund Agency (NRFA); Public Service Pension Fund (PSPF).

²³ Choma City Council; Choma General Hospital; Livingstone General Hospital.

²⁴ National Road Fund Agency (NRFA).

²⁵ National Road Fund Agency (NRFA).

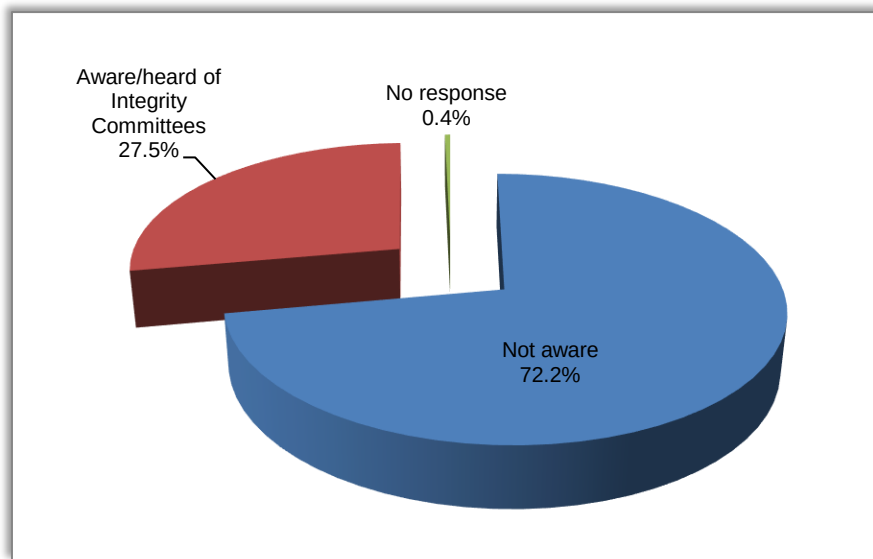


Figure 23.0 Awareness of Integrity Committees

Disaggregated by Public Sector functions, Figure 24.0 below shows that a public seeker or user awareness of Integrity Committees is comparably higher with respect to committees in the Public Service (31.3%), than in Local Government (24.8%) and Quasi-Government institutions (26.9%).

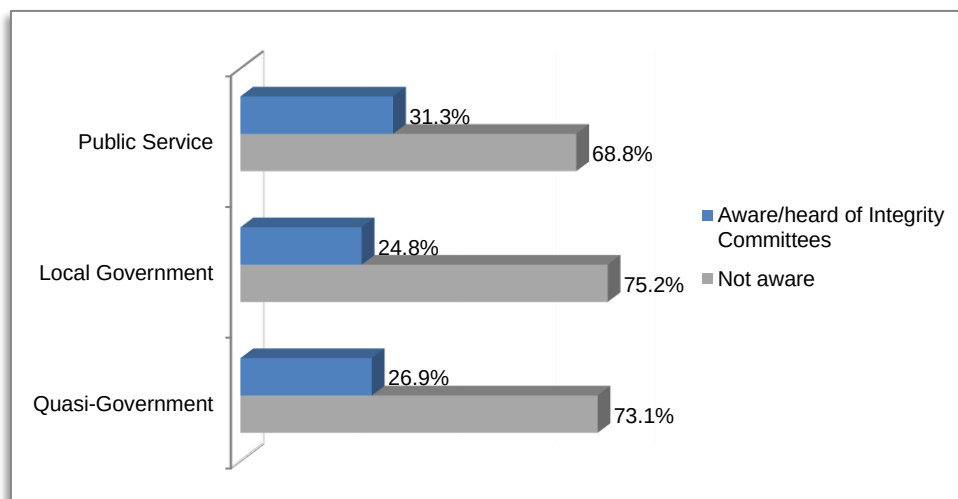


Figure 24.0 Awareness of Integrity Committees – Public Sector Function

Consideration of selected demographic characteristics of the Exit Polls respondents is that with respect to gender, 24.7% among female respondents are aware or have heard of Integrity Committees; while among males it is 29.2%.

Lastly, Figure 25.0 below shows that awareness of Integrity Committees is comparably higher among respondents in the Public Sector (42.1%) than in other sector or employment category.

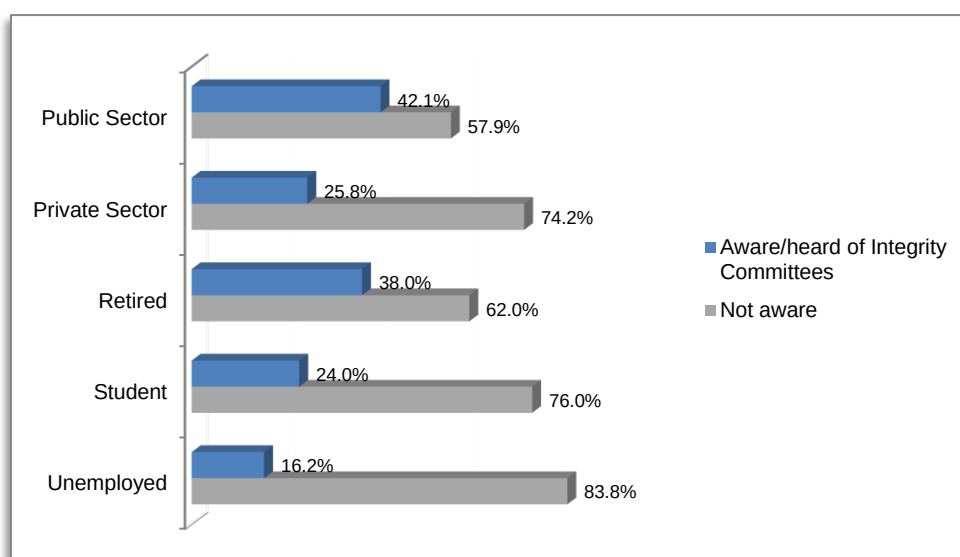


Figure 25.0 Awareness of Integrity Committees – Employment

B. Knowledge of Integrity Committee in institution

Of the 224 respondents that are aware or have heard of the Committees, 40.6% had knowledge of the existence of an Integrity Committee in the institution they sought a service from.

Further, it is observed that respondents' knowledge of the existence of a Committee in the institution they visited is highest from the institution's Service Centre, 34.1%; social media and/or the institution's website, 22.0%; other sources²⁶, 22.0%; radio and/or television (TV), 19.8%; and newspapers 2.2%, as shown in Figure 26.0 below.

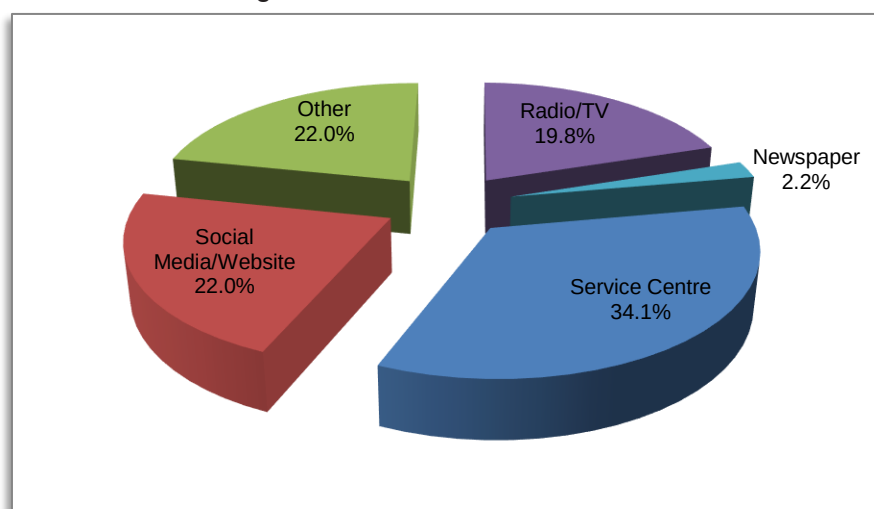


Figure 26.0 Source of Knowledge of Integrity Committee

Disaggregation of source of knowledge of the existence of an Integrity Committee in the institution with respect to Public Service function, the Evaluation findings are that the dominant source of knowledge is Service Centres for Local Government (44.4%); radio and/or TV for the Public Service (27.3%); and social media and/or website for Quasi-Government institutions (35.5%) (Figure 27.0).

²⁶ Information from other persons; Internal information from staff member; and personal contact with IC.

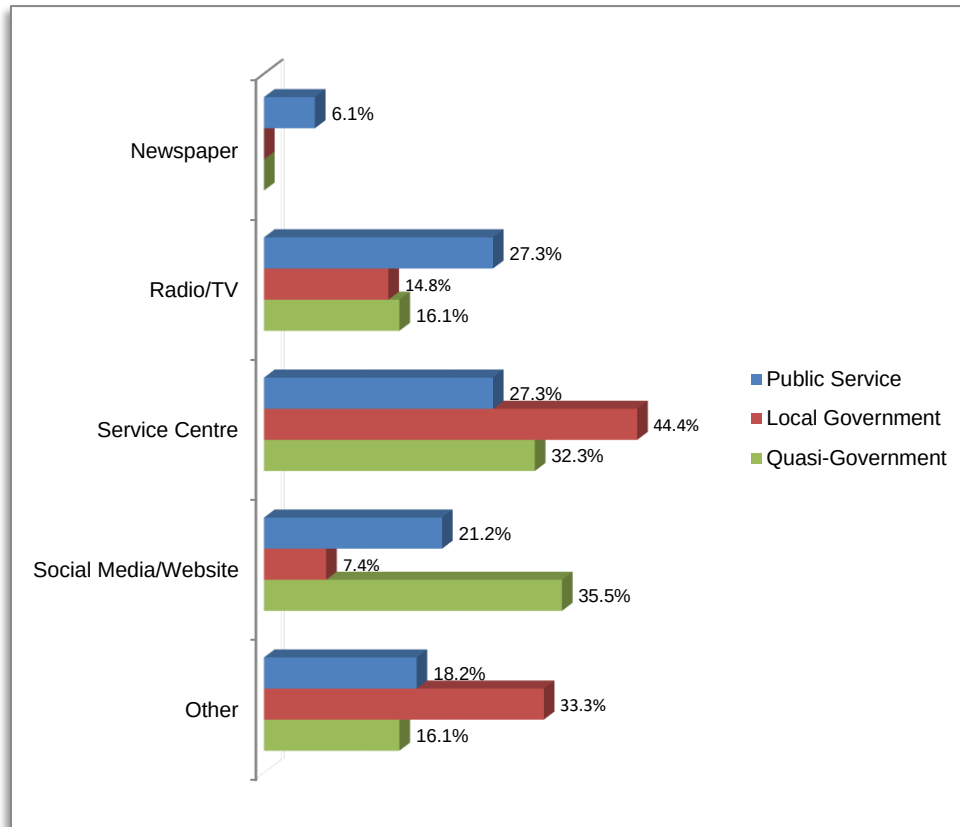


Figure 27.0 Source of Knowledge of Integrity Committee – Public Sector Function

Source of knowledge of the existence of an Integrity Committee in an institution with respect to respondents' age cohort is that social media and/or websites is most frequent source among respondents that are 18 to 25 years old (85.7%); service centres among 26 to 35 (35.7%), 36 to 45 (43.3%) and 46 to 55 (36.4%); other sources, 56 to 65 (36.4%); and, radio and/or TV among those above 65 years old (42.9%) as shown in Figure 28.0 below.

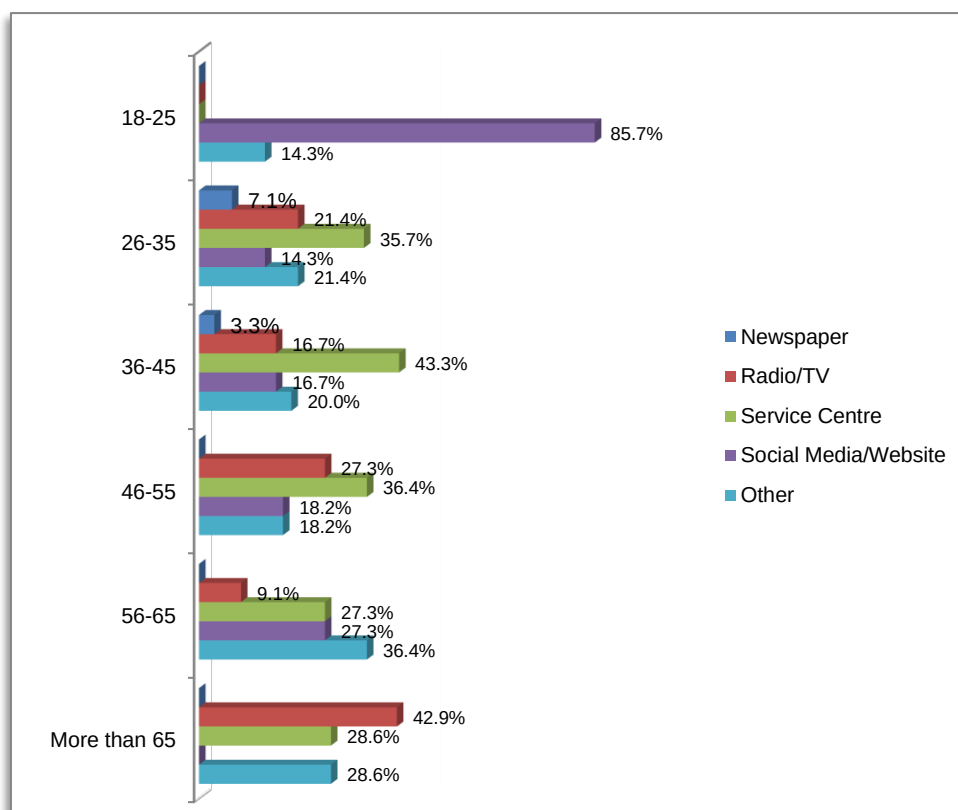


Figure 28.0 Source of Knowledge of Integrity Committee – Age Cohort

C. Service delivery experiences

With respect to the operation of the institution/company in terms of service delivery, the distribution of respondent experiences shows that a considerable number were mostly *very satisfied* and *slightly satisfied*, 32.7% and 30.6% respectively as shown in Figure 29.0 below.

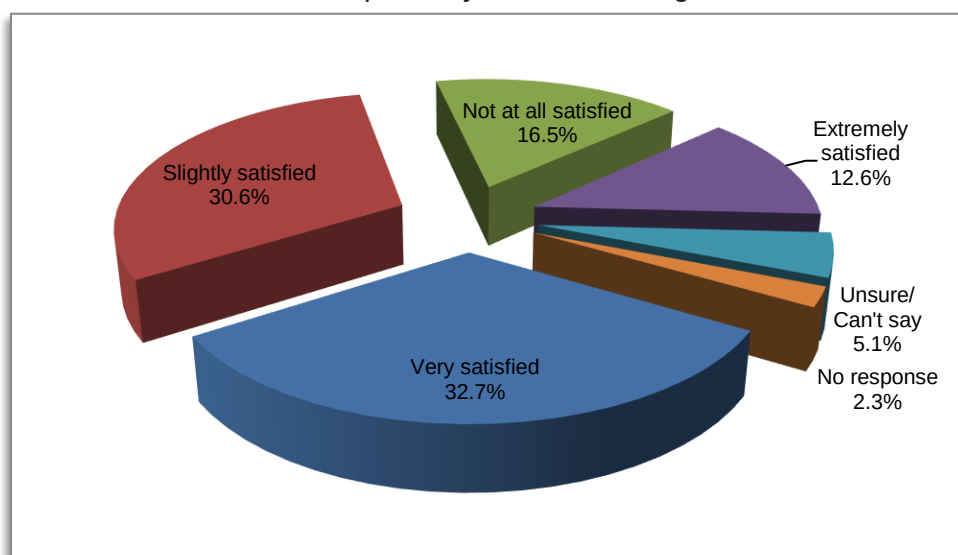


Figure 29.0 Service Delivery Experiences

Figure 30.0 below shows that service delivery user satisfaction, is comparatively higher in Public Service and Quasi-Government institutions.

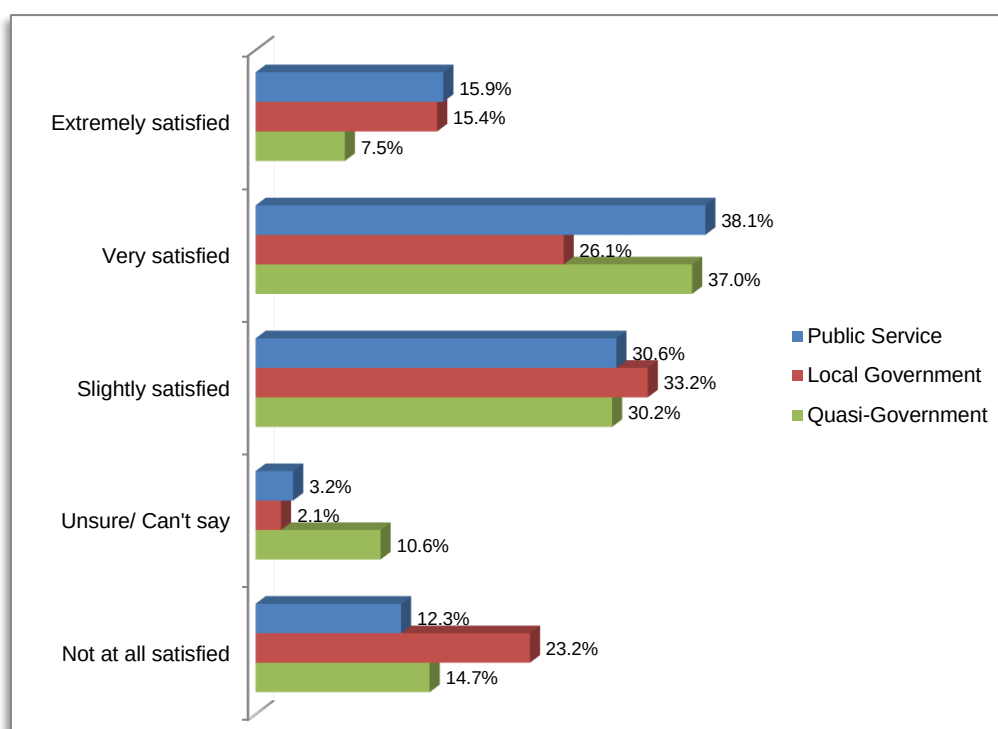


Figure 30.0 Service Delivery Experiences - Public Sector Function

D. Service Delivery Charters

A service delivery charter (SDC) is a public document that provides basic information on the services provided by an institution, and the standards of service that the public or customers should expect from an institution, including feedback and grievance mechanisms. Of the 39 institutions targeted in the Exit Polls component of the Evaluation, 32 institutions have service delivery charters.

The Evaluation finding on whether respondents knew that the institution they visited has a service delivery charter or not, was that 29.5% of the respondents indicated that it had; and 70.5% (or 424 respondents) that it did not.²⁷

Noteworthy is that of 424 respondents that responded that there was no service delivery charter in the institution they visited, 73.3% had no knowledge that in fact there is a service delivery charter in the institution, as shown in Table 10.0 below.

Table 10.0 Knowledge of SDC in Target Institution

SDC exists in Institution	No. of Respondents	Percent
Evidenced	113	26.7%
Not evidenced	311	73.3%
	424	100.0%

In addition, in 31 institutions where there is a service delivery charter, Exit Polls respondents only evidenced a charter in 10 of the institutions, as shown in Appendix VIII.

Further, disaggregated by public sector function, Table 11.0 below shows that respondent knowledge of existence of a service delivery charter is comparatively higher in Quasi-Government

²⁷ Considers 601 valid responses (that is excludes no responses) to the question - Does the institution/company have a Service Delivery Charter?

institutions (53.7%); and the lack of knowledge that there is a service charter in place, is highest in Public Service institutions (39.5%).

Table 11.0 Knowledge of Implemented SDC – Public Sector Function

Sector	Yes		No	
	Absolute	Relative	Absolute	Relative
Public Service	35	19.8%	123	39.5%
Local Government	47	26.6%	116	37.3%
Quasi-Government	95	53.7%	72	23.2%
Total	177	100.0%	311	100.0%

Lastly, the information the service charters communicate to clients is procedures for acquiring the service (36.5%); cost of the service (18.0%); duration within which the service will be provided (16.7%); service assistance and feedback channels (13.5%); and service complaints and grievances procedures (15.4%), as shown in Figure 31.0 below.

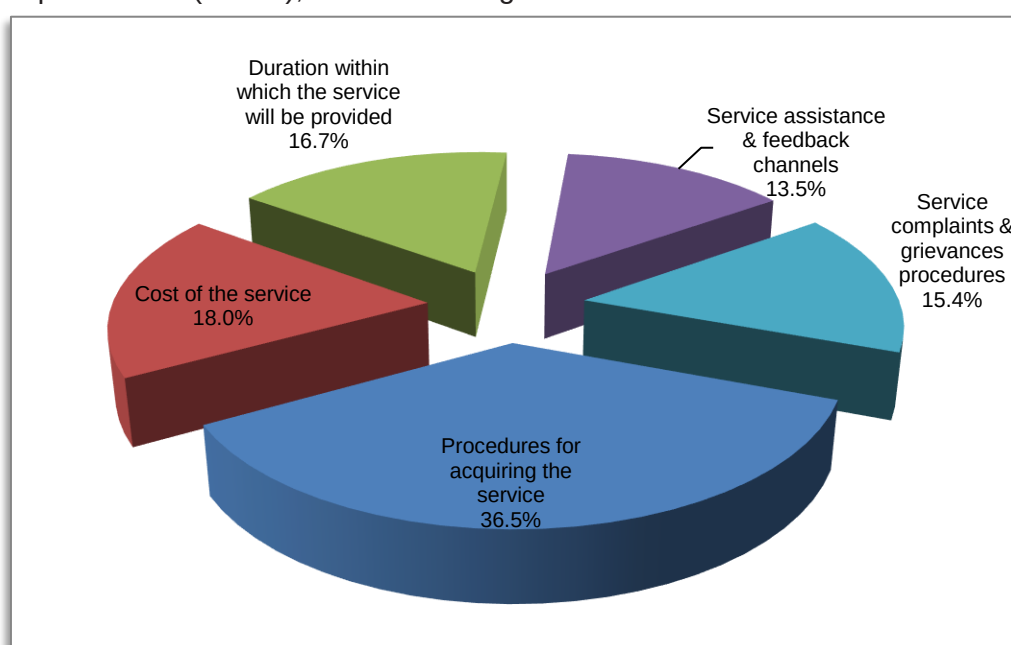


Figure 31.0 Service Charter Information

E. Service provision improvement

The Evaluation also sought to establish whether there has been an improvement in service provision in the Exit Polls target institutions. Premised on respondents that frequently and occasionally sought seek a public service from an institution, the findings are mostly that there has been an improvement to a *large extent* and *moderate extent*, 30.6% and 31.0% respectively (Figure 32.0).

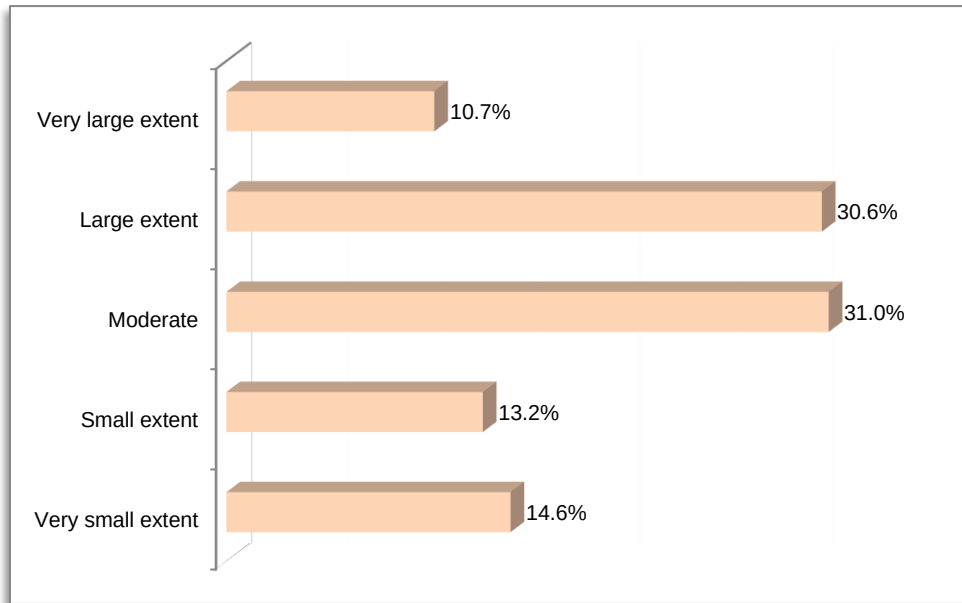


Figure 32.0 Service Provision Improvement

Comparatively Figure 33.0 below shows that disaggregated by public sector function, the most improvement (*very large extent*) is in the Public Service, 17.6%; and the lowest (*very small extent*) is in Quasi-Government institutions (16.5%).

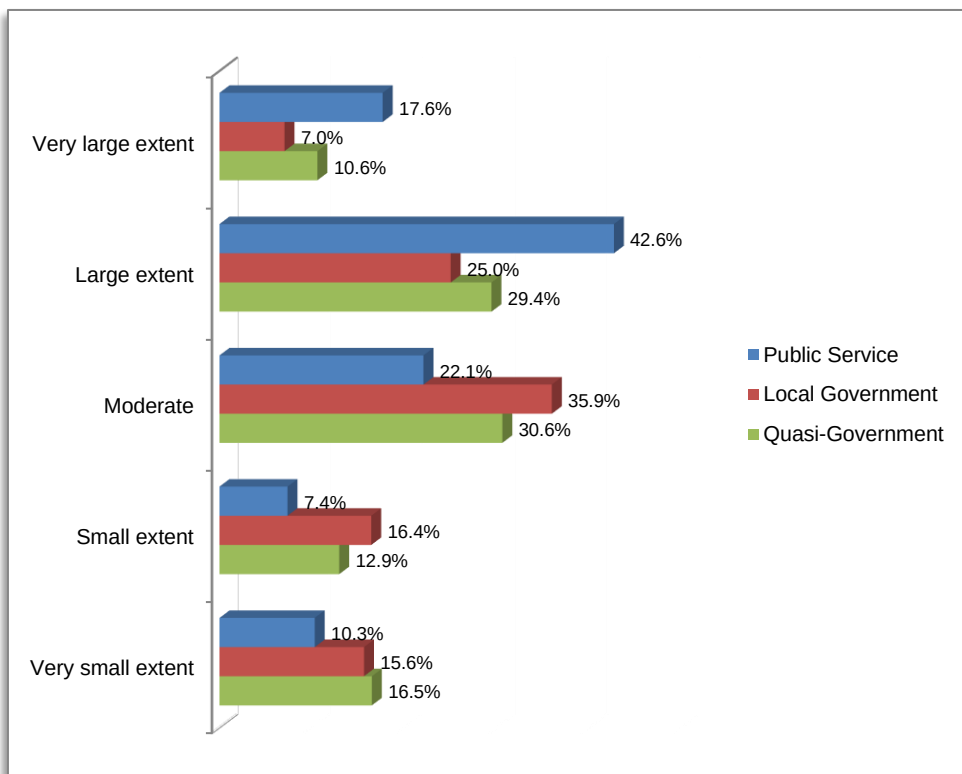


Figure 33.0 Service Provision Improvement – Public Sector Function

F. Customer Service Centre helpfulness

In institutions where there is a customer service centre (79.5%), the Evaluation findings shows that the extent to which the centres are helpful to service seekers is generally *moderate* (38.7%), as shown in Figure 34.0 below.

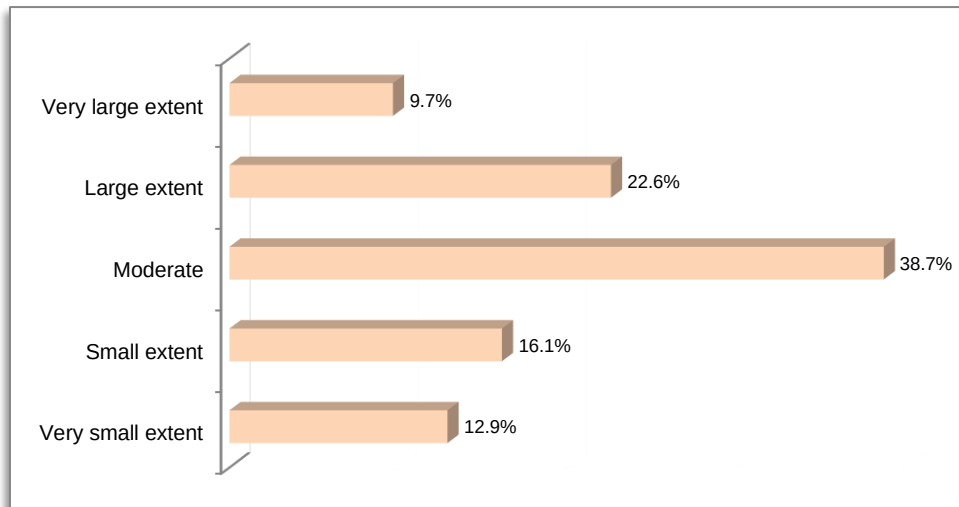


Figure 34.0 Customer Service Centre Helpfulness

Disaggregated by public sector function, the extent of customer service centre helpfulness is more evident in Public Service institutions, with *very large extent* being 33.3%, and *large extent*, 44.4% (Figure 35.0).

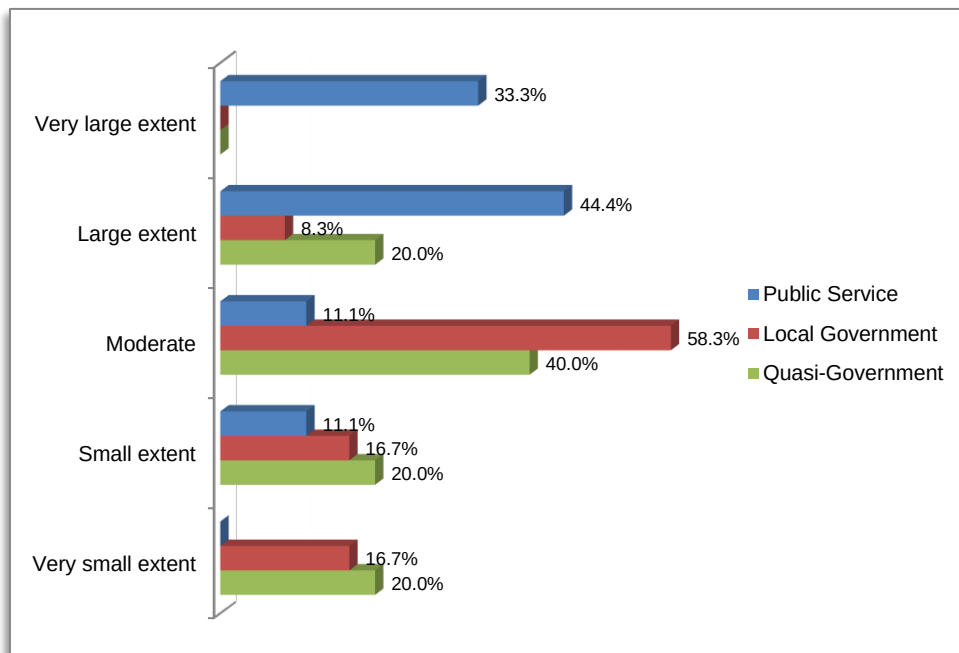


Figure 35.0 Customer Service Centre helpfulness – Public Sector Function

Figure 35.0 also shows that customer service centre helpfulness is comparatively lower in Quasi-Government institutions (20.0%).

3.1.5 Impact

This section provides the findings on the extent to which Integrity Committees have made a difference on corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) experiences in the institutions.

The section covers the Programme impact with respect to the extent of reduction in vulnerability to corruption and malpractices; change in attitudes towards reporting bribery and unethical behaviours; and public perceptions and experiences on corruption or malpractices experiences and reporting, and equality in accessing a public service.

3.1.5.1 Reduction in vulnerability to corruption and malpractices

The Evaluation findings on the extent to which members of staff in the target institutions are able to provide services without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) is mostly to a *very large extent* (21.5%) and *large extent* (32.3%), as shown in Figure 36.0 below.

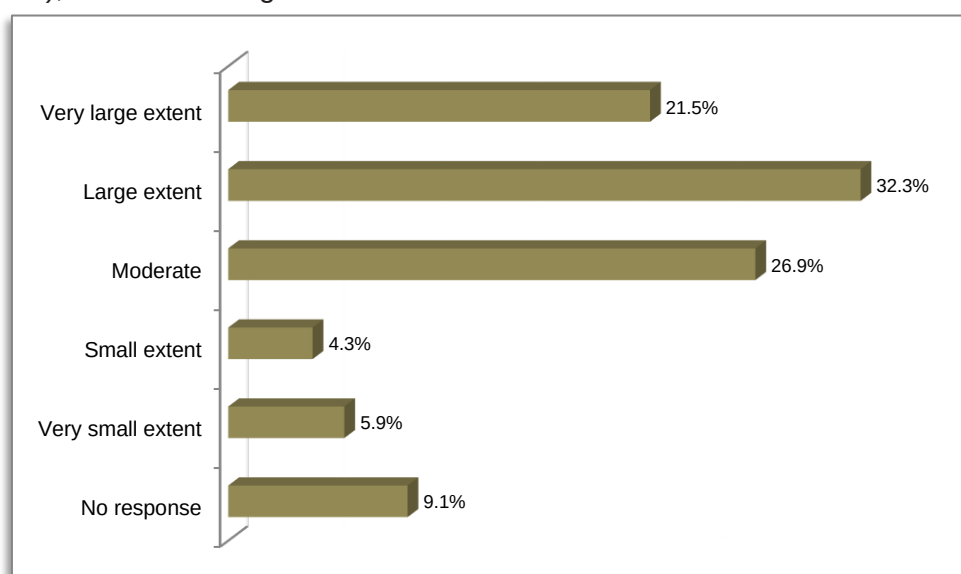


Figure 36.0 Staff Vulnerability to Corruption

The reasons for responses for small extent and very small extent with respect to staff vulnerability to corruption, in verbatim are:

- (a) Awareness is lacking.
- (b) IC is new.
- (c) IC is not functional.
- (d) It is difficult to monitor what staff do. There is a possibility that some could be involved in malpractice acts e.g. bribery because of the limited salaries despite undergoing induction with ACC. Some staff members are prone to getting a bribe in exchange for providing a quick service due to high work load.
- (e) Members of staff are vulnerable to corruption; however, implementation of the recommendations of the IC can reduce vulnerabilities to corruption.
- (f) Most officers are ever caught being involved in bribes, and as such, it is difficult to ascertain that despite multiple sensitisation sessions conducted by the IC staff, members of staff are still not prone to a bribe during the course of duty.
- (g) Need to train all and sensitise them on the work of the IC.
- (h) There is a high risk especially for staff members who operate in the field/outside the office as they are not closely monitored.

- (i) There is a lot of human to human contact with the public. There are delays in paying salaries putting staff at risk.
- (j) There is a lot of vulnerability as the salaries are low, there is understaffing and a lot of inter personal relationship with clients.
- (k) There are great interface interactions with the public.

With respect to the extent to which members of the public service can access a public service in the target institutions without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours), the Evaluation findings are mostly to a *very large extent* (18.8%) and *large extent* (43.5%), as shown in Figure 37.0 below.

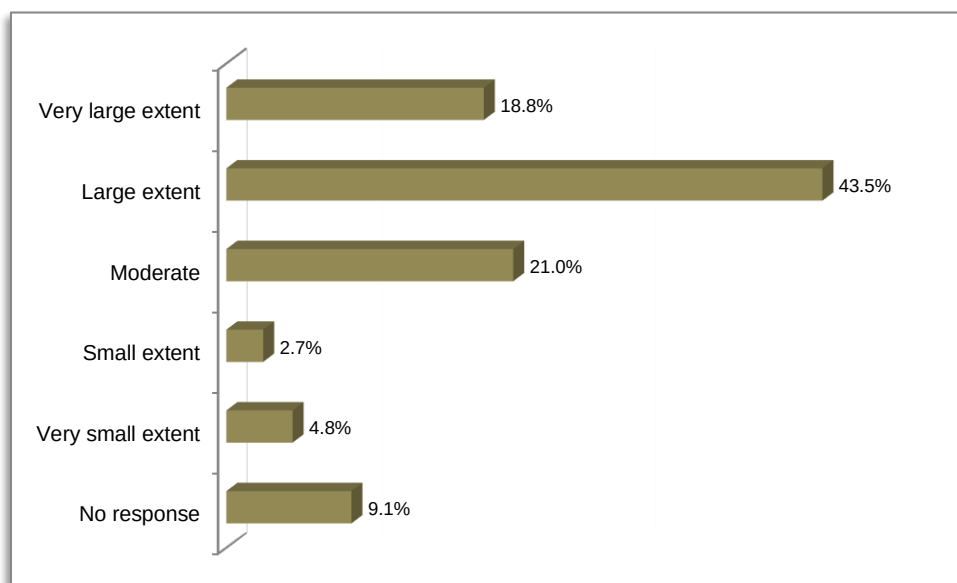


Figure 37.0 Public Vulnerability to Corruption

In verbatim, the reasons why the extent to which members of the public service can access a public service in the target institutions without being vulnerable to corruption is *small extent* and *very small extent* are:

- (a) Minimal reduction of interpersonal contact as recommended by the IC.
- (b) IC is not functional.
- (c) Members of the public always have no patience to wait to get a service, and can certainly bribe a staff to get a quick service.
- (d) Members of the public may offer incentives to obtain services outside the normal procedure.
- (e) People expect to bribe to get a service. Even when an officer does not ask they would offer.
- (f) The public are also open to corruption as there has been no sensitisation.
- (g) The question of unduly delayed service opens the public to the vice.
- (h) There is always that one client that does not want to queue up and end up inducing the staff on duty to get quick service.

3.1.5.2 Change in attitudes towards reporting bribery and unethical behaviours

The findings on extent to which the Programme interventions have resulted in a positive change in members of staff's and the public's attitudes towards reporting bribery experiences and unethical behaviours, are dominantly to a *large extent* (41.9%), as shown in Figure 38.0 below.

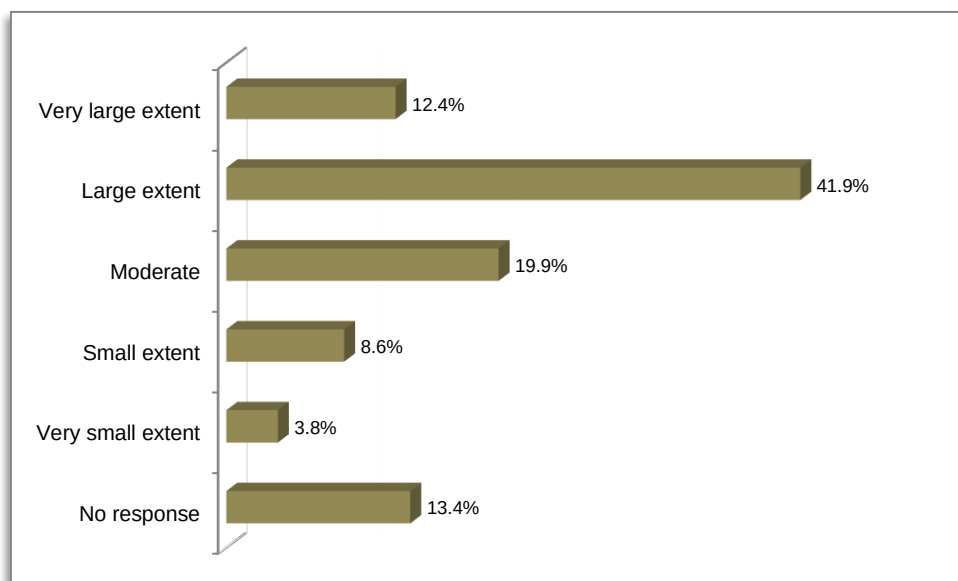


Figure 38.0 Change in Corruption Reporting Attitudes

3.1.5.3 Public perceptions and experiences

This sub-section provides the Evaluation findings on the Programme impact sub-question of the extent to which public service seekers access a public service in the institution without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours).

The section covers public perceptions and experiences in institutions where the Integrity Committee Programme is being implemented specifically on vulnerability to corruption and malpractices; corruption or malpractices experiences and reporting; and, equality in accessing a public service.

A. Vulnerability to corruption and malpractices

The most frequent perceptual Evaluation finding on the extent to which a public service seeker can access a public service in an institution without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) is mostly that it is to very *small extent* and *large extent*, 21.4% and 20.8% respectively (Figure 39.0)

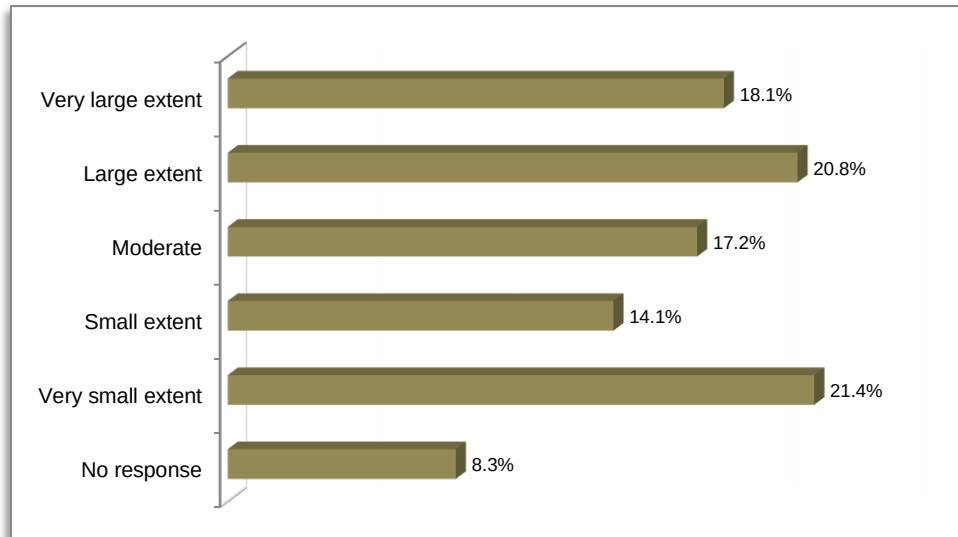


Figure 39.0 Vulnerability to Corruption and Malpractices

Notable however is that Figure 40.0 below shows that disaggregated by public sector function, public service seekers vulnerability to corruption and malpractices in accessing a public service are most observed in Quasi-Government institutions. That is, Quasi-Government institutions are wherein there is a *very small extent* of accessing a public service without being vulnerable corruption and malpractices.

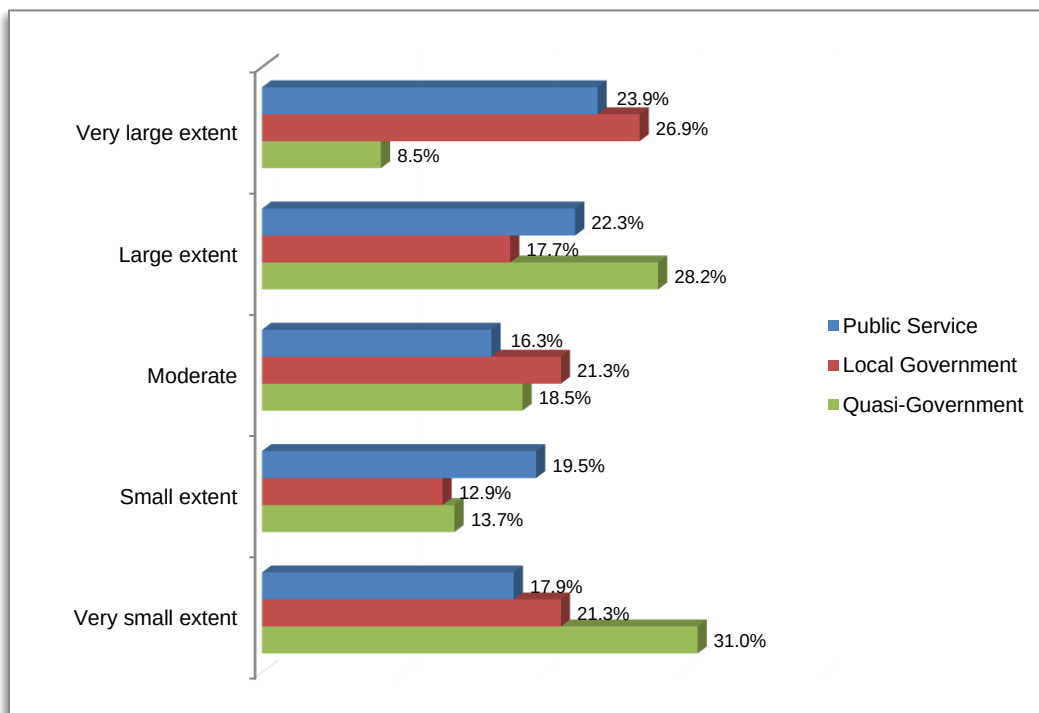


Figure 40.0 Vulnerability to Corruption and Malpractices – Public Service Function

B. Corruption or malpractices experiences and reporting

Ten-point three percent (10.3%) of the 816 Exit Polls respondents had a corruption (bribery) or malpractices (unethical, illegal, or negligent professional behaviours) experience in the Evaluation target institution.

Reporting the incident or experience among the 84 respondents constituted 10.7% or 9 respondents. Of the 9, 5 reported to an officer in the institution; 2 to the Anti-Corruption Commission; and, 1 each to the Customer Service Centre and Zambia Police Service.

The most frequent reason of the 75 that did not report the incident is *did not know where to report* (37.3%), *was not interested in reporting* (26.7%), and *do not know how to report* (13.3%) as shown in Figure 41.0 below.

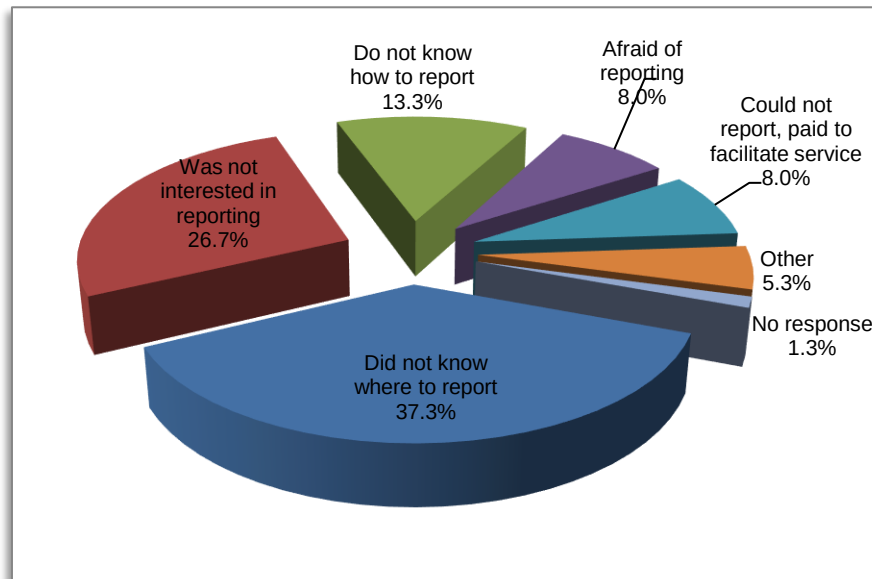


Figure 41.0 Reason for Not Reporting Corruption Incident

The other reasons provided in verbatim are:

- I accepted that I had a case to answer.
- I just recorded the conversation and I told them that I have recorded you but did not report any way.
- Just forgot about it.
- Reported but no response or action.

C. Equality in accessing a public service

Exit Polls respondent's opinion on whether women, the youth and persons with disabilities, benefit equally in accessing a public service is mostly that they *always* do so, 57.4% (Figure 42.0).

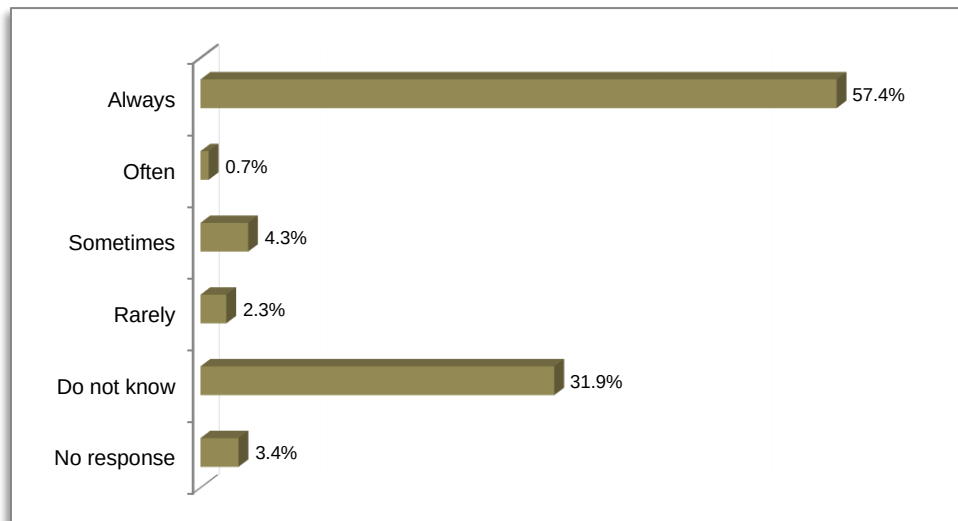


Figure 42.0 Equality in Accessing a Public Service

In the case of the 54 (6.5%) respondents that indicated that women, the youth and persons with disabilities, sometimes and rarely benefit equally in accessing a public service, the reasons provided are that this is due to lack of adapted infrastructure²⁸ (42.6%); lack of prioritisation policies (29.6%); behavioural marginalisation²⁹ (16.7%); and, insufficient adapted guidelines and/or instructions (11.1%), as shown in Figure 43.0 below.

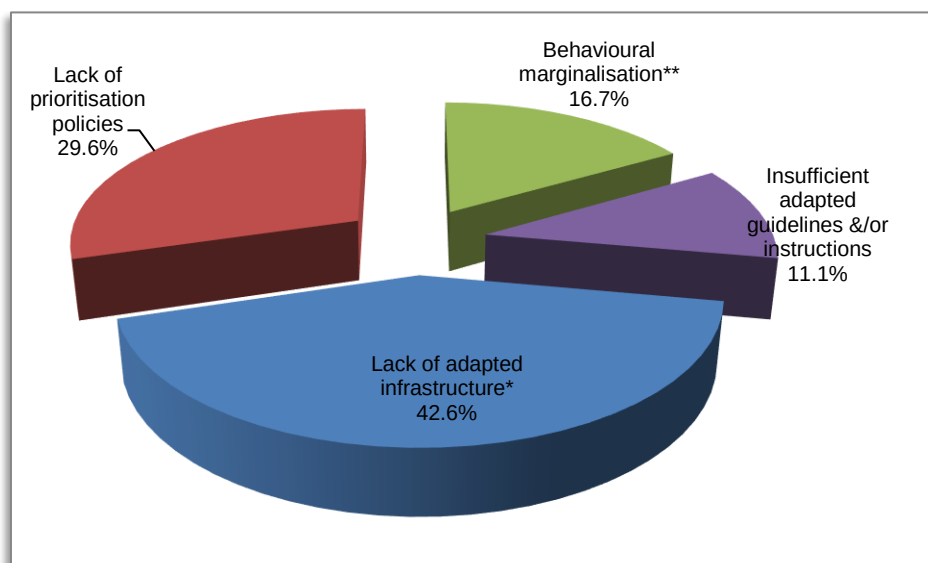


Figure 43.0 Reasons for Non-Equality in Accessing a Public Service

3.1.6 Sustainability

This section provides the findings on the extent to which the Integrity Committee Programme benefits will likely continue into the foreseeable future.

The section covers the Programme sustainability with respect to the extent to which the benefits of the Programme can likely continue; whether the Programme design and implementation, as it

²⁸ That is, lack of disability friendly infrastructure.

²⁹ That is, behaviours that are in a way discriminatory or otherwise hurtful to a marginalised person or group.

is, can likely continue to result in reduction of vulnerabilities to corruption and related malpractices; and, lastly the extent to which Integrity Committee Programme implementing institutions have gained the ability to independently continue implementing the Programme.

3.1.6.1 Benefits of the Programme

The expected consequent benefits of the Programme implementation are reduction in incidences of corruption, maladministration, and improved service delivery in the institutions. The Evaluation findings on the extent to which the benefits of the Programme will likely continue are mostly *very large extent* (27.4%); and, *large extent* (55.4%) as shown in Figure 44.0 below.

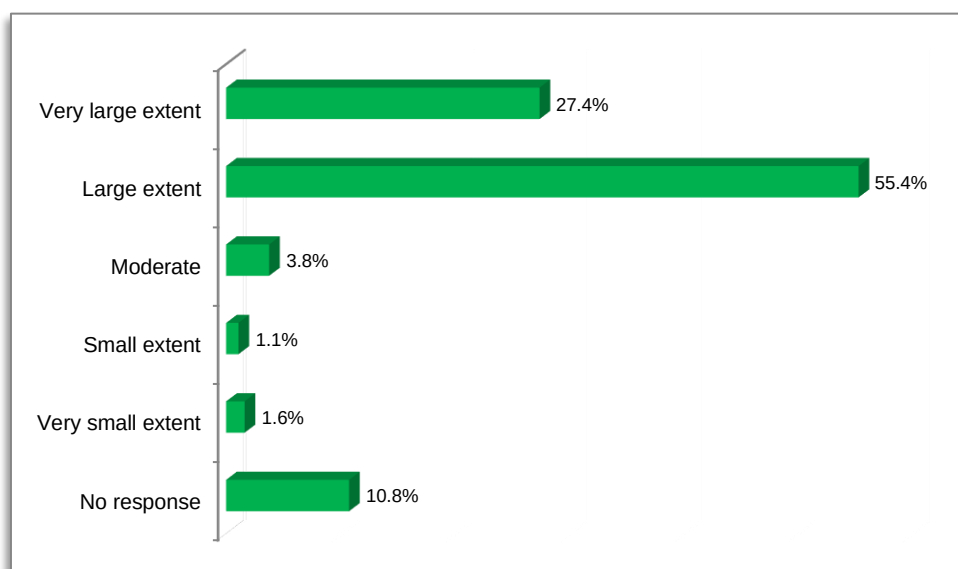


Figure 44.0 Benefits of the Programme

In verbatim, the reasons for respondent responses of Moderate, Small extent, or Very small extent are:

- (a) Because of its ad hoc nature.
- (b) Because they are too weak and no one recognises them.
- (c) Depends on IC commitment and efficiency, thereof. That is, timely responses are important.
- (d) IC is a demand on funds/ need risk analyses specific to the institution.
- (e) IC is not functional.
- (f) Lacks budget line.
- (g) Needs consistent support from ACC.
- (h) There is need to fully support the program for it to succeed.
- (i) There is no availability at the moment but it seems to have started.

3.1.6.2 Design and implementation

Figure 45.0 below, shows that the extent to which whether the Programme design and implementation, as it is, can likely continue to result in reduction of vulnerabilities to corruption (bribery) and related malpractices (unethical, illegal, or negligent professional behaviours) is mostly that it can continue to do so to a *large extent* (55.9%).

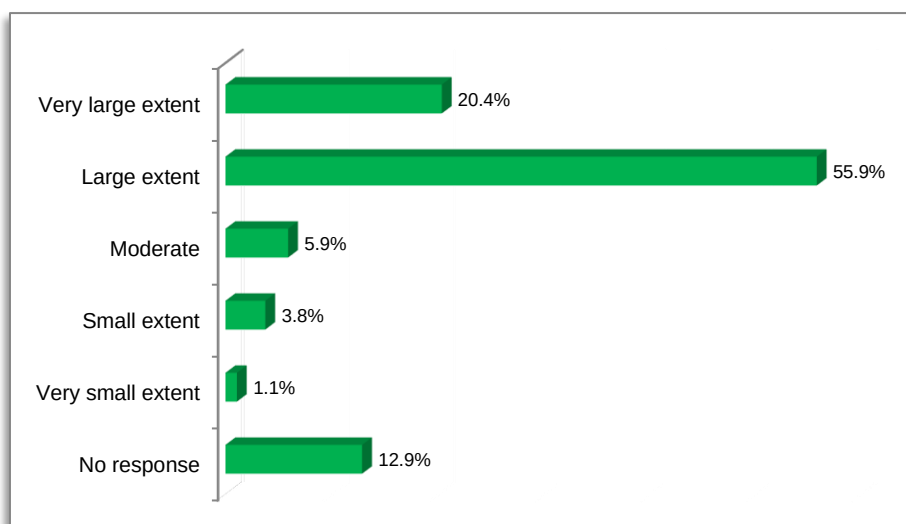


Figure 45.0 Design and Implementation

Respondents' responses that Programme design and implementation, as it is, can likely continue to result in reduction of vulnerabilities to corruption and related malpractices to a *moderate*, *small extent*, or *very small extent*, in verbatim are:

- (a) ACC needs to provide more support.
- (b) Despite the program being implemented there is still need for more integration into the various institutional interventions.
- (c) IC/ACC are not as aggressive as HIV/AIDs interventions.
- (d) Lack of implementation of recommendations.
- (e) Need interventions at the frontline that is why IC should be devolved to lower levels.
- (f) Need to strengthen capacity.
- (g) Not fully implemented/lacks awareness activities.
- (h) The committee has not been functional.
- (i) The program is just being rolled out.
- (j) There has been no review of activities.
- (k) There is need for more funding and continuous monitoring.
- (l) There is still need for a lot of capacity building.
- (m) To achieve a continual reduction in corruption, monitoring its implementation or roll-out is highly recommended.

3.1.6.3 Independent Programme implementation

The Evaluation findings on the extent to which Integrity Committee Programme implementing institutions have gained the ability to independently continue implementing the Programme, *very large extent*, 10.2%; *large extent*, 47.8%; *moderate*, 11.8%; *small extent*, 5.9%; *very small extent*, 6.5%; and, *no response*, 17.7% (Figure 46.0).

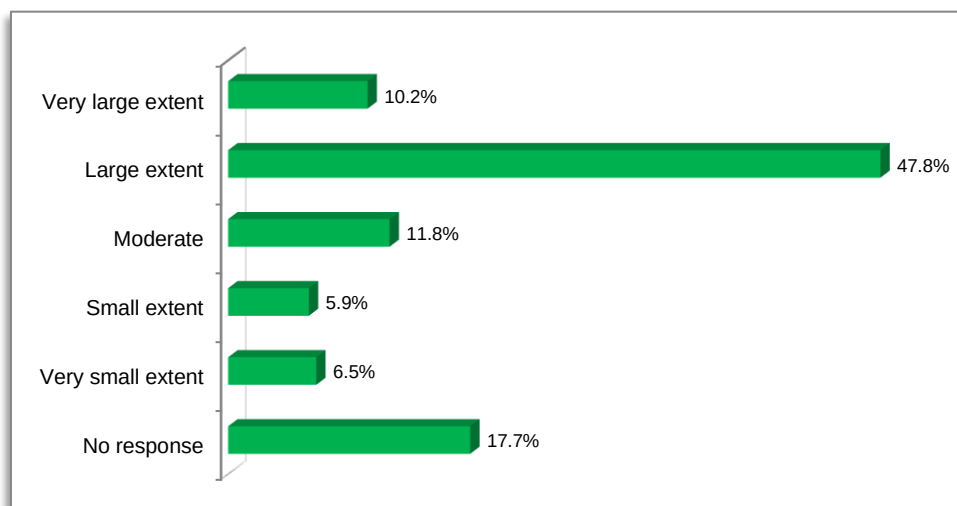


Figure 46.0 Independent Programme Implementation

In verbatim the reasons for *moderate*, *small extent* or *very small extent*, on the extent to which Programme implementing institutions have gained the ability to independently continue implementing the Programme are:

- (a) ACC is seen as a mother body doing inductions but have not been seen mentoring the teams that have been trained for further guidance and cross learning to strengthen their operations.
- (b) ACC needs to increase IC monitoring and advisory services
- (c) Budget constraints
- (d) Staffing constraints
- (e) IC is not yet fully functional
- (f) Institutions still need more technical support to implement the IC Interventions due to high staff turnover.
- (g) There is need for ACC to conduct mentoring sessions to assess abilities for ICs if they are to be independent going forward. Currently, institutions like ourselves and others still need hand holding.
- (h) It is still very weak and can be manipulated.
- (i) It still has a lot of people from management.
- (j) It still needs capacity building.
- (k) Most institutions still need technical assistance. E.g. training due to staff turnover.
- (l) Interventions need to be service specific.
- (m) Since the IC recommendations are not implemented the ICs cannot be said to gain independence.
- (n) The department through the IC has not performed well. It's unfortunate that ACC is always reminding the institution to carry out certain interventions whenever they follow up instead of being proactive.
- (o) ACC, therefore, needs to support the IC through training around corruption prevention, which should be ongoing.

- (p) The IC, like many others, still needs a lot of technical support and learning from ACC and other institutions with best practice to strengthen its operations, particularly in view of high staff turnover and new leadership.
- (q) The institution is dependent on the ACC for technical support and other needs to operationally the office
- (r) There are some members who sit on senior management committees and it is felt that they have a negative influence on the IC.

3.2 Implementation of 2015 ICPE Recommendations

The assessment of the implementation of the 2015 ICPE recommendations covered 14 of the 15 institutions that participated in the evaluation in 2015³⁰. Of these, only in 9 institutions was there knowledge of the recommendations proposed in the 2015 Integrity Committee Programme Evaluation Report³¹.

The succeeding sub-sections provides the findings on the extent to which selected recommendations in the 2015 ICPE report were implemented by the institutions³².

3.2.1 Implementation

- A. The recommendation that the *"IC structure should not be pre-set but rather respond to the different institutional needs"* was accepted and implemented by 8 institutions (CEEC; LiCC; MoL; NIPA; PSPF; RTSA; ZPS; ZRA); accepted and not implemented by 1 (NRFA).
- B. That *"membership should include IC officers from other institutions to enhance transparency in the operations of the IC Programme"*, was accepted but not implemented by 4 institutions (CEEC; NIPA; NRFA; PSPF); and rejected by 5 (LiCC; MoL; RTSA; ZPS; ZRA).
- C. On *"creating a permanent position with clear job description for an officer to manage the day to day administration work of the IC"*, 4 institutions accepted and implemented the recommendation (MoL; RTSA; ZPS; ZRA); and 5, accepted but did not implement the recommendation (CEEC; LiCC; NIPA; NRFA; PSPF).
- D. That *"job descriptions of officials that qualify to be appointed as IC members should include the work of the IC Programme"*, was accepted and implemented by 5 institutions (LiCC; MoL; RTSA; ZPS; ZRA); and accepted but not implemented by 4 (CEEC; NIPA; NRFA; PSPF).
- E. Lastly the recommendation to *"increase funding and the timely release of such funds for ICs to be implemented and operate effectively"*, was accepted and implemented by 7 (CEEC; LiCC; MoL; PSPF; RTSA; ZPS; ZRA); and accepted but not implemented by 2 institutions (NIPA; NRFA).

The reasons for accepted, but not implemented were budget constraints, and structural issues. While, the reasons for rejection, in verbatim, were:

- (a) It is not possible to have people from out of the institution.
- (b) It will not work. It would not be practical.

³⁰ Citizen Economic Empowerment Commission (CEEC); Immigration Department; Judiciary; Livingstone City Council; Luanshya Municipal Council; Lusaka City Council; Ministry of Lands; National Institute of Public Administration (NIPA); National Road Fund Agency (NRFA); Ndola City Council; Public Service Pension Fund (PSPF); Road Transport and Safety Agency (RTSA); Zambia Police Service; and Zambia Revenue Authority (ZRA). Konkola Copper Mines staff was not available.

³¹ These institutions are: Citizen Economic Empowerment Commission (CEEC); Livingstone City Council (LiCC); Ministry of Lands (MoL); National Institute of Public Administration (NIPA); National Road Fund Agency (NRFA); Public Service Pension Fund (PSPF); Road Transport and Safety Agency (RTSA); Zambia Police Service (ZPS); and, Zambia Revenue Authority (ZRA).

³² The Tables are provided in Annex 2, Implementation of 2015 ICPE Recommendations

(c) It would just complicate issues.

3.2.2 Relevance

- A. The recommendation to “*ensure that the process of reporting corruption is adequately publicised*”, was accepted and implemented by 8 institutions (CEEC; LiCC; MoL; NRFA; PSPF; RTSA; ZPS; ZRA); and accepted but not implemented by 1 (NIPA).
- B. And that there is need to. “*increase awareness levels among both the public officials and general public on where to report cases of unethical conduct/corruption*”, was accepted and implemented by 7 (LiCC; MoL; NRFA; PSPF; RTSA; ZPS; ZRA); and accepted but not implemented by 2 institutions (CEEC; NIPA).

The reasons for accepted, but not implemented were budget constraints; and that it is work-in-progress.

3.2.3 Effectiveness

- A. Seven institutions (LiCC; MoL; NRFA; PSPF; RTSA; ZPS; ZRA), accepted and implemented the recommendation to “*reengineer some of the administration aspect which include, the provision of clear service information, quicken the process of attending to inquiries or issuance of the services*”; and 2 institutions, accepted but did not implement the recommendation (CEEC; NIPA).
- B. The recommendation to “*display visual information on how to report corruption in the customer waiting rooms and service points*”, was accepted and implemented by 6 institutions (LiCC; MoL; NRFA; RTSA; ZPS; ZRA); and accepted but not implemented by 3 (CEEC; NIPA; PSPF).
- C. And that there is need to “*educate both the general public and public official on the dangers and importance of reporting unethical conduct/corruption*”, was accepted and implemented by 6 institutions (LiCC; MoL; NRFA; RTSA; ZPS; ZRA); and accepted but not implemented by 3 (CEEC; NIPA; PSPF).

The reasons for accepted, but not implemented are as in Section 3.2.1.

3.2.4 Impact

- A. The recommendation to “*introduce electronic systems in servicing the general public in order to limit physical interactions between service seekers and service providers as a means of reducing opportunities for corruption and increasing customer satisfaction*”, was accepted and implemented by 6 institutions (LiCC; MoL; NRFA; RTSA; ZPS; ZRA); and accepted but not implemented by 3 (CEEC; NIPA; PSPF).
- A. And that, there is need to “*coordinate and synergise the efforts of all stakeholders including the communities, state institutions, civil society, international organizations and most importantly the donor community*”, was accepted and implemented by 8 institutions (CEEC; LiCC; MoL; NRFA; PSPF; RTSA; ZPS; ZRA); and accepted but not implemented by 1 (NIPA).

The reasons for accepted, but not implemented are as in Section 3.2.1.

3.2.5 Sustainability

- A. Six institutions (LiCC; MoL; NRFA; PSPF; ZPS; ZRA) accepted and implemented the recommendation that *“institutions to take ownership on the implementation of ICs by institutionalising the IC Programme through the creation of an office/position to manage the day to day administration of the IC activities”*; and 3 (CEEC; NIPA; RTSA), accepted but did not implement.
- B. On *“promoting external partnerships to create strong and stable institutional linkages”*, 7 institutions accepted and implemented the recommendation (CEEC; LiCC; MoL; NRFA; PSPF; ZPS; ZRA); and 2 accepted but did not implement” (NIPA; RTSA).
- C. Lastly, the recommendation on need for *“continuous training of the ICs members and public official through capacity building to create a pool of trainers to help in the training of new staff”* as a means of Programme sustainability was accepted and implemented by 7 institutions (CEEC; MoL; NIPA; NRFA; PSPF; ZPS; ZRA); and 2 accepted but did not implement (LiCC; RTSA).

For relevance, effectiveness impact and sustainability, the reasons for accepted, but not implemented were budget constraints, lack of funding, lack of adequate resources, and that it is “work-in-progress”. And no institutions rejected the recommendations.

3.3 Monitoring, Evaluation and Assessment Tool and Logical Framework

3.3.1 Monitoring, Evaluation and Assessment Tool

The Integrity Committee Monitoring, Evaluation and Assessment (MEA) tool is a ‘self-programme implementation performance assessment rating tool’ for Integrity Committees, provided for in the Handbook for Integrity Committees on Corruption Prevention³³. The tool provides Programme performance assessment rating on corruption prevention in an institution using three components, which prevention, education and enforcement (PEE).

The logical sequence of cause-effect assumptions for the control of corruption and malpractices in institutions is premised on seven dimensions. These are the existent of effective leadership; best practice interventions; human resource management; procurement management; financial management; complaint handling system and customer interface; and collaborative partnerships.

The assessment of the Tool established that although most indicators sufficiently provide a reliable measure of changes associated with an intervention, there was need to adjust some indicators especially on prevention to ensure that they are able to provide for measurement reliability and/or clarity (that is avoid ambiguity).

The indicators that have been adjusted with respect to prevention are provided in Table 12.0 below.

³³ Handbook for Integrity Committees on Corruption Prevention, Page 51.

Table 12.0 Adjustments to the MEA**1. Standards for Prevention**

Dimension	Previous indicator	Adjusted Indicator	Justification
A Leadership	2. Management ensures timely submission of the Annual Corruption Prevention Action Plan (ACPAP)	Management submits the Annual Corruption Prevention Action Plan (ACPAP) as prescribed in IC Guidelines	Measurement of ENSURE and TIMELY not definite. That is, it is not reliable.
	3. Management is committed to ensuring that ACPAP is implemented and activities monitored	ACPAP is implemented and activities monitored	Indicator is a question of a result, and not commitment. Commitment has ambiguity in measurement.
	4. Management ensures timely submission of Quarterly Progress Reports (QPR) and MEA	Management implemented the MEA	Indicator 4 has been separated into two, to provide for assessment of implementation of MEA; and adherence to prescribed timelines with respect to QPR.
		Management submits Quarterly Progress Reports (QPR) as prescribed	
C Human Resource Management	17. Hiring, placement and promotions are conducted in a transparent manner	Hiring, placement and promotions are conducted in compliance with the institution's policies and procedures, as a means of ensuring transparency	Needed to demonstrate transparency premised on existing policies.
E Financial Management	31. All financial transactions are periodically audited	All financial transactions are audited as prescribed in Public Finance laws	Public Finance laws provide for how financial transactions are audited.
	33. Financial control systems are regularly reviewed to ensure effectiveness against fraud and corruption.	Financial control systems are annually reviewed to ensure effectiveness against fraud and corruption	The annual Auditor General's reports provide lessons for review of financial control systems.

Enforcement only had one adjustment on the dimension of leadership, which is that the indicator *“There is visible action and/or support from top and senior management to enforce integrity development measures”* has been adjusted to simply read *“Top and senior management enforce integrity development measures”*. This was done to avoid ambiguity in how *“visible action and/or support”* can be measured.

Annex 4 provides the complete adjusted MEA.

3.3.2 Integrity Committee Programme Logical Framework

The developed Integrity Committee Programme Logical Framework with appropriate performance indicators is provided in Annex 5.

4.0 Programme Performance Lessons and Challenges

This section of the Report provides the performance, lessons and challenges observed in the 2023 evaluation of the Integrity Committee Programme.

The section also provides insights from the 2023 Integrity Committee Chief Executive Officers' Forum; and, findings on the implementation of 2015 ICPE recommendations.

4.1 The 2023 Integrity Committee Programme Evaluation

Ratings are used for the assessment of the performance of each of the evaluation criteria of relevance, coherence, efficiency, effectiveness, impact and sustainability.

The ratings are derived from the Likert Scale responses used in the semi-structured Key Informant Interviews and Exit Polls. Appendix IX provides the Programme evaluation ratings scale used.

The interpretation of the evaluation ratings for the criterion relevance, coherence, efficiency, effectiveness and impact are as follows.

1. *Highly satisfactory (HS)* means that from the percent observations made during the Evaluation, there are no observed shortcomings in:
 - (a) How well the Programme is designed in order to meet its overall objective (relevance);
 - (b) How well the Programme is aligned with other interventions implemented by an institution (coherence);
 - (c) The cost-effectiveness of Programme in delivering, or likely delivering the intended results (efficiency);
 - (d) The Programme producing the desired results (effectiveness); and,
 - (e) The Programme making a difference in corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) experiences in an institution (impact).
2. *Satisfactory (S)* - minor observed shortcomings in the Programme relevance, coherence, efficiency, effectiveness and impact.
3. *Neither satisfactory nor unsatisfactory (NSU)* - neither minor nor major observed shortcomings in the Programme relevance, coherence, efficiency, effectiveness and impact. That is, not much has changed.
4. *Unsatisfactory (U)* - major observed shortcomings in the Programme relevance, coherence, efficiency, effectiveness and impact.
5. *Highly Unsatisfactory (U)* - severe observed shortcomings in the Programme relevance, coherence, efficiency, effectiveness and impact.

Interpretation of the evaluation ratings for the sustainability criteria is as follows.

1. *Highly Likely (HL)*, means there are minimal risks to the Programme continuing into the foreseeable future, as most benefits are observable.
2. *Likely (L)* - minimal risks to the Programme continuing into the foreseeable future, as some benefits are observable.
3. *Neither Likely nor Unlikely (NLU)* - moderate risks, but expectations are that at least some benefits will be sustained due to the progress made in Programme implementation so far.
4. *Unlikely (UL)* - significant risk that some benefits will not continue into the foreseeable future, although some outputs and activities will be sustained.
5. *Highly Unlikely (HUL)* - severe risks that Programme benefits, as well as most outputs and activities will not be sustained.

Based on the foregoing, the overall most frequent performance rating of the Programme is *satisfactory* (38.7%). This means that there are generally minor observed shortcomings in the Programme relevance, coherence, efficiency, effectiveness and impact (Table 13.0).

Table 13.0 Overall Programme Evaluation Rating

Evaluation Criteria	Rating				
	HS	S	NSU	U	HU
Relevance	35.3%	49.3%	12.3%	2.4%	0.7%
Coherence	25.4%	41.3%	19.1%	7.1%	7.0%
Efficiency	45.6%	40.9%	8.9%	2.8%	1.9%
Effectiveness	9.8%	23.3%	20.0%	17.7%	29.2%
Impact	19.6%	38.6%	23.6%	8.3%	9.9%
Mean Rating	27.2%	38.7%	16.8%	7.6%	9.7%
Sustainability Mean Rating	HL	L	NLU	UL	HUL
	22.2%	61.5%	8.5%	4.2%	3.6%

In terms of sustainability, Table 13.0 shows that the Programme there are minimal risks to it continuing into the foreseeable future, as some benefits are observable. The mean rating is *likely* (61.5%).

The succeeding sub-Sections provide performance ratings of the sub-questions in each respective evaluation criteria, the salient lessons, and challenges.

4.1.1 Relevance

The most frequent overall mean rating of Programme relevance (*how well the Integrity Committee Programme is designed in order to meet its overall objective*) is *satisfactory* (49.3%) for all the Likert Scale evaluation sub-questions. That is, in general, there are minor observed shortcomings in how the Programme is designed in order to meet its overall objective (Table 14.0).

Table 14.0 Relevance Ratings

Evaluation Component	Rating				
	HS	S	NSU	U	HU
Consistency with policy and law					
<i>Eighth National Development Plan (8NDP)</i>	√				
<i>National Anti-Corruption Policy (NACP)</i>	√				
<i>Anti-Corruption Act No. 3 of 2012</i>	√				
<i>Public Interest Disclosure Act No. 4 of 2010</i>	√				
<i>Public Procurement Act No. 8 of 2020</i>	√				
Suitability of Programme design & implementation	25.7%	48.5%	18.7%	5.8%	1.2%
Relevance to needs and priorities of AC	28.1%	56.1%	14.0%	1.8%	0.0%
Consistency with the priorities for AC	31.3%	55.8%	12.9%	0.0%	0.0%
Usefulness & value of Programme interventions	54.7%	41.9%	3.0%	0.4%	0.0%
Activities and outputs	36.8%	44.1%	12.9%	3.8%	2.4%
Mean Rating	35.3%	49.3%	12.3%	2.4%	0.7%

The prominent lesson provided in Table 14.0 above, however is that there are no observed shortcomings in how well the Programme is designed in order to meet its overall objective specifically with respect to consistency with policy and law, and its usefulness and the value of the Programme interventions.

4.1.2 Coherence

The most frequent overall mean rating of Programme coherence (*whether the Integrity Committee Programme interventions are aligned with other interventions implemented by an institution*) is *satisfactory* (41.3%), as shown in Table 15.0 below.

Table 15.0 Coherence Ratings

Evaluation Component	Rating				
	HS	S	NSU	U	HU
Compatibility	28.2%	44.8%	22.7%	1.8%	2.5%
Complementarity	31.3%	44.8%	12.3%	6.1%	5.5%
Harmonisation	22.1%	51.5%	15.3%	6.1%	4.9%
Co-ordination	19.5%	50.6%	17.1%	6.7%	6.1%
IC institution-centric perspective	34.7%	20.6%	16.5%	11.8%	16.5%
Interventions value addition	16.9%	35.5%	30.7%	10.2%	6.6%
Mean Rating	25.4%	41.3%	19.1%	7.1%	7.0%

Notable in Table 15.0 is the *unsatisfactory* rating of 16.5% on whether the Integrity Committee in the target institutions has an institution-centric perspective, which is that there are major observed shortcomings in the Programme endeavour to have a non-peripheral (unimportant) perspective. This was most observed in Local Government institutions, where Integrity Committees have the most peripheral (unimportant) perspective.

4.1.3 Efficiency

The most frequent overall mean rating of Programme efficiency (*extent to which the Programme interventions delivered, or likely delivered, intended results in a cost-effective manner*) is *highly satisfactory* (45.6%), as shown in Table 16.0 below. That is, there are no observed shortcomings in the cost-effectiveness of Programme in delivering, or likely delivering the intended results.

Table 16.0 Efficiency Ratings

Evaluation Component	Rating				
	HS	S	NSU	U	HU
Use of allocated funds	52.8%	27.8%	5.6%	8.3%	5.6%
Programme Cost of IC Services vs Benefits	36.4%	54.5%	9.1%	0.0%	0.0%
Cost effectiveness of Programme interventions	47.6%	40.5%	11.9%	0.0%	0.0%
Mean Rating	45.6%	40.9%	8.9%	2.8%	1.9%

However, Table 16.0 also shows that, there are minor observed shortcomings in the extent to which the cost of the Integrity Committee Programme services or activities is reasonable in relation to the benefits (54.5%).

4.1.4 Effectiveness

The evaluation ratings for Programme effectiveness (*extent to which Integrity Committee Programme interventions have produced the desired results*) was based on public perceptions and experiences³⁴.

Table 17.0 below shows that, based on public perceptions and experiences, the most frequent overall mean rating of effectiveness, is *highly unsatisfactory* (29.2%). That is, there are severe observed shortcomings in the Programme producing the desired results.

Table 17.0 Effectiveness Ratings

Evaluation Component	Rating				
	HS	S	NSU	U	HU
<i>Public perceptions and experiences</i>					
Awareness of Integrity Committees	6.0%	6.4%	5.2%	10.0%	72.4%

³⁴ This is because the interrogation of effectiveness from Key Informants was an interrogation of desired results with respect to planning and reporting; key anti-corruption interventions introduced to date; and type of key interventions and process effectiveness, hence use of a Likert scale was not appropriate.

Service delivery experiences	12.9%	33.5%	5.3%	31.4%	16.9%
Service provision improvement	10.7%	30.6%	31.0%	13.2%	14.6%
Customer Service Centre helpfulness	9.7%	22.6%	38.7%	16.1%	12.9%
Mean Rating	9.8%	23.3%	20.0%	17.7%	29.2%

The most common source of knowledge of the existence of an Integrity Committee in institutions is Service Centres, social media and institution's website and radio and TV.

Programme effectiveness with respect to specifically service delivery experiences has minor observed shortcomings (*satisfactory*); and with respect to service provision improvement and Customer Service Centre helpfulness, there are neither minor nor major shortcomings observed. Further, Integrity Committees' introduction of key corruption prevention interventions intended to result in or have a striking effect on the reduction of corruption and malpractices³⁵ can be deduced to be highly satisfactory. This is because 92.9% of institutions covered in the Evaluation have introduced some form of key interventions, with introduction of interventions being most prevalent in the periods 2006 to 2010 and 2016 to 2020. Quasi-Government institutions comparatively have higher percentage introduction of the interventions intended to result in the reduction of corruption and malpractices. The most key intervention introduced is service delivery charters; and the least are Conflict of Interest Policies.

However, Integrity Committees' development of Annual Corruption Prevention Action Plan (ACPAP) and Quarterly Progress Reports (QPR) and their submission to the Anti-Corruption Commission (ACC), thereof, is highly unsatisfactory, as percentage submission among the Integrity Committees is undesirable. Of the 19 Integrity Committees that existed by 2012, 42.1% and 31.6% had submitted ACPAPs and QPRs respectively; and in 2022, only 42.9% of the Integrity Committees covered in the evaluation had submitted ACPAPs; and 31.0%, QPRs.

Further, on service delivery charters, what is concerning is the observation that individuals only evidenced a charter in 32.3% of the institutions where there is a service delivery charter. Knowledge of existence of a service delivery charter is higher in Quasi-Government institutions; and the lack of knowledge that there is a service charter in place, is highest in Public Service institutions.

In addition, of significant concern is the observed unsatisfactory introduction of Codes of Ethics in the Public Service (35.7%) and the Local Government (46.2%) institutions. This is despite the fact that, there is a Code of Ethics for the Public Service and Local Government³⁶.

The Code of Ethics for the Public Service and Local Government, Part IV (Operationalisation of the Code), provides that there shall be *Notification* (and acknowledgement of receipt, thereof) and *Sensitisation* of the Code.³⁷

Notification, in part, provides that:

"At the institutional level, every Public Service and Local Government Service employee shall receive a copy of the Code issued by the Responsible Officer and/or Chief Executive Officer (CEO)".

And, Sensitisation that:

"Public Service Management Division (PSMD), Line Ministries and Local Authorities in collaboration with other Government institutions shall conduct sensitisation programmes with regard to the Code".

Lastly, a considerable number of Integrity Committees have developed mechanisms for receiving and providing redress on complaints emanating from within and outside the organisation relating

³⁵ Service Delivery Charters; Codes of Ethics; Codes of Conduct; Conflict of Interest Policies; Whistleblower Policies; and, Gifts and Benefits Policies.

³⁶ Revised 2020

³⁷ Code of Ethics for the Public Service and Local Government (Revised 2020), p12.

to ethical issues and hindrances to efficient and effective service delivery. These are mostly Customer Service Centres and Complaints Handling Systems.

4.1.5 Impact

The most frequent overall mean rating of Programme impact (*extent to which Integrity Committees have made a difference on corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) experiences in the institutions*) is *satisfactory* (38.6%), as shown in Table 18.0 below. That is, there are minor observed shortcomings in the Programme making a difference in corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) experiences in an institution.

Table 18.0 Impact Ratings

Evaluation Component	Rating				
	HS	S	NSU	U	HU
Reduction in vulnerability to corruption & malpractices					
<i>Provision of services</i>	23.7%	35.5%	29.6%	4.7%	6.5%
<i>Public access to services</i>	20.7%	47.9%	23.1%	3.0%	5.3%
Change in attitudes - reporting bribery & unethical behaviours	14.3%	48.4%	23.0%	9.9%	4.3%
Public vulnerability to corruption & malpractices	19.8%	22.7%	18.7%	15.4%	23.4%
Mean Rating	19.6%	38.6%	23.6%	8.3%	9.9%

There are marginal variances in the Evaluation sub-questions of reduction in vulnerability to corruption and malpractices in public access to services, and public vulnerability to corruption and malpractices, as shown in Figure 47.0 below.

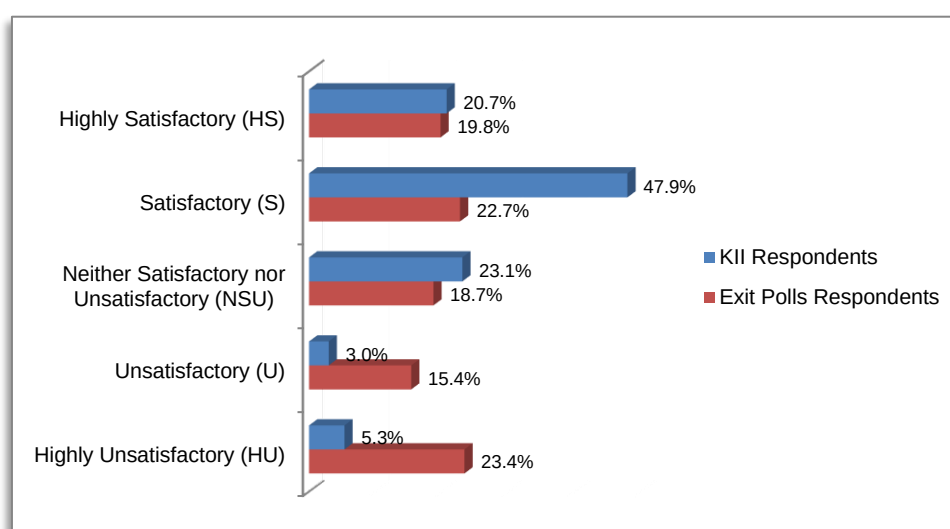


Figure 47.0 Vulnerability to Corruption and Malpractices Compared

Figure 47.0 shows that whereas public access to services has a dominant performance rating of *satisfactory* (47.9%), public vulnerability to corruption and malpractices has dominant performance rating of *highly unsatisfactory* (23.4%).

However, actual individual experiences of corruption or malpractices are low (10.3%); and so too, is reporting of such experiences (10.7%). The most frequent reason for not reporting an experience of corruption or malpractice is that the individual affected did not know where to report. This is corroborated by findings in the 2022 Zambia Bribe Payers Index (ZBPI) Survey Report,

which indicates that lack of knowledge of where to report a corruption incident constituted 30.2% of all the reasons provided³⁸.

Lastly, Programme impact with respect to wherein equality in accessing a public service is unsatisfactory. This is, mostly because of lack of adapted infrastructure, prioritisation policies, behavioural marginalisation, and insufficient adapted guidelines and/or instructions.

4.1.6 Sustainability

The most frequent overall mean rating of Programme sustainability (*extent to which the Integrity Committee Programme benefits will likely continue into the foreseeable future*) is *likely* (61.5%), as shown in Table 19.0 below. That is, there are minimal risks to the Programme continuing into the foreseeable future, as some benefits are observable.

Table 19.0 Sustainability Ratings

Evaluation Component	Rating				
	HL	L	NLU	UL	HUL
Benefits of the Programme	30.7%	62.1%	4.2%	1.2%	1.8%
Design & implementation	23.5%	64.2%	6.8%	4.3%	1.2%
Independent implementation	12.4%	58.2%	14.4%	7.2%	7.8%
Mean Rating	22.2%	61.5%	8.5%	4.2%	3.6%

Table 19.0 shows that there are no significant variances in Programme sustainability in all the Evaluation sub-questions of whether the benefits of the Programme can likely continue; whether the Programme design and implementation, as it is, can likely continue to result in reduction of vulnerabilities to corruption and related; and, the extent to which Programme implementing institutions have gained the ability to independently continue implementing the Programme.

4.2 Integrity Committee Implementation Challenges

This section provides the Programme implementation challenges, which are wherein programme performance has major or severe observed shortcomings; and wherein there are moderate, significant or severe risks that Programme benefits will likely not continue into the foreseeable future. The number of observations is 149.

The most observed shortcomings and/or risks to the Integrity Committee Programme implementation performance are that most Committees considered in the Evaluations were being reconstituted (23.4%), and that there is inadequate Programme advisory support and capacity building (18.4%), as shown in Figure 48.0 below³⁹. Reconstitution of the Committees is mostly due to membership turnover.

³⁸ 2022 Zambia Bribe Payers Index (ZBPI) Survey Report, Section 3.6.3 Corruption Reporting, p68.

³⁹ Also provided in tabular form in Appendix X.

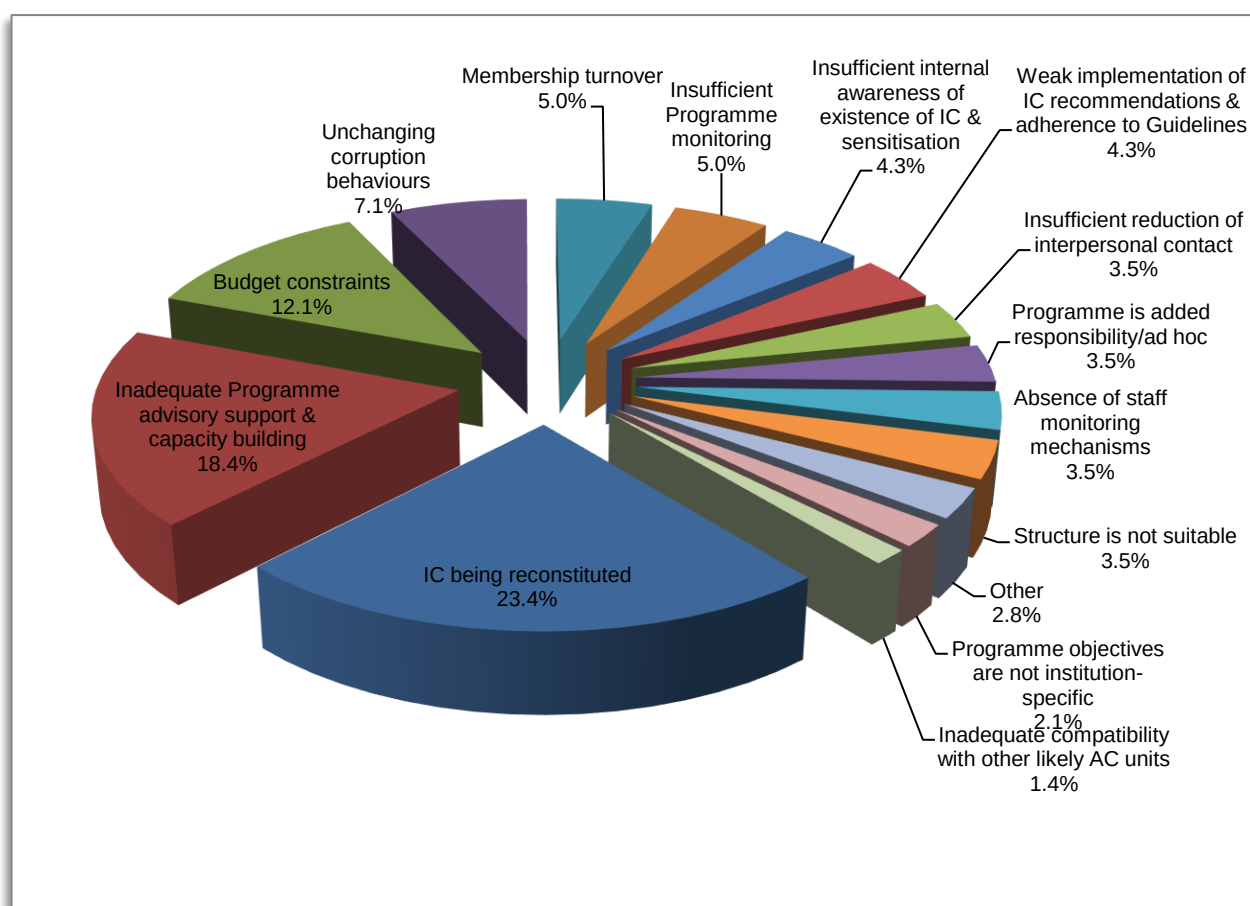


Figure 48.0 Integrity Committee Implementation Challenges

Other comprises Impact of Covid-19; Insufficient willingness to institute IC; IC belongs to the ACC/It is an imposition; and, Lack of internal consultation

Notable is that the challenge of continued reconstitution of Integrity Committees is most observed in Programme sustainability, 66.7%; and coherence (alignment of Programme with other interventions implemented in an institution), 15.2% (Table 20.0).

Table 20.0 Implementation Challenges – IC being Reconstituted

Evaluation Criteria	No. of Observation	Relative
Sustainability	22	66.7%
Coherence	5	15.2%
Impact	2	6.1%
Efficiency	2	6.1%
Effectiveness	1	3.0%
Relevance	1	3.0%
33	100.0%	

The challenges are most observed in Programme sustainability and impact as discussed in the sub-sections below.

Programme sustainability

Figure 49.0 below provides the distribution of the risks to Programme benefits likely continuing into the foreseeable future. Inadequate Programme advisory support and capacity building (31.3%) and Integrity Committees being reconstituted (27.5%) are the most discernible risks.

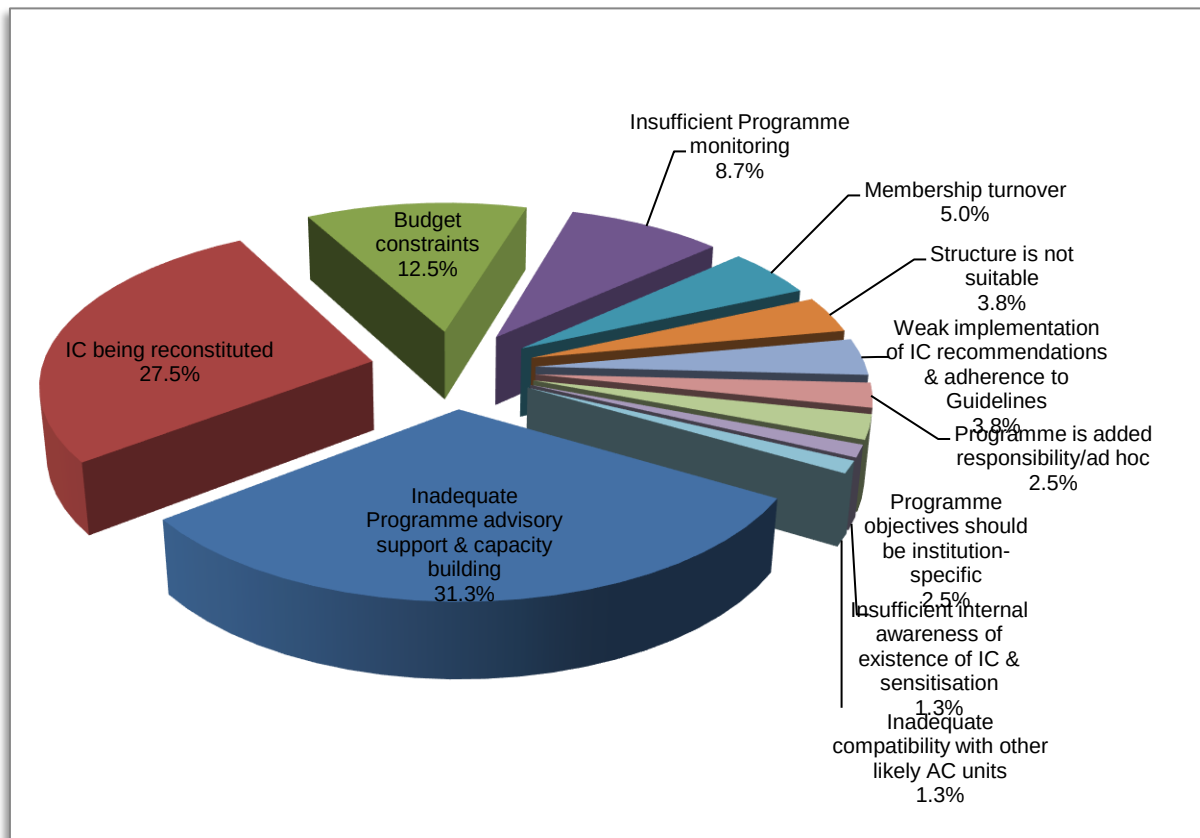


Figure 49.0 Integrity Committee Implementation Challenges - Sustainability

Programme impact

In terms of Programme impact, the most discernible shortcomings in the Programme making a difference on corruption and malpractices experiences in the institutions are unchanging corruption behaviours (37.0%), insufficient reduction of interpersonal contact (18.5%), absence of staff monitoring mechanisms (18.5%), and insufficient internal awareness of existence of the Committee and sensitisation (11.1%) as shown in Figure 50.0 below.

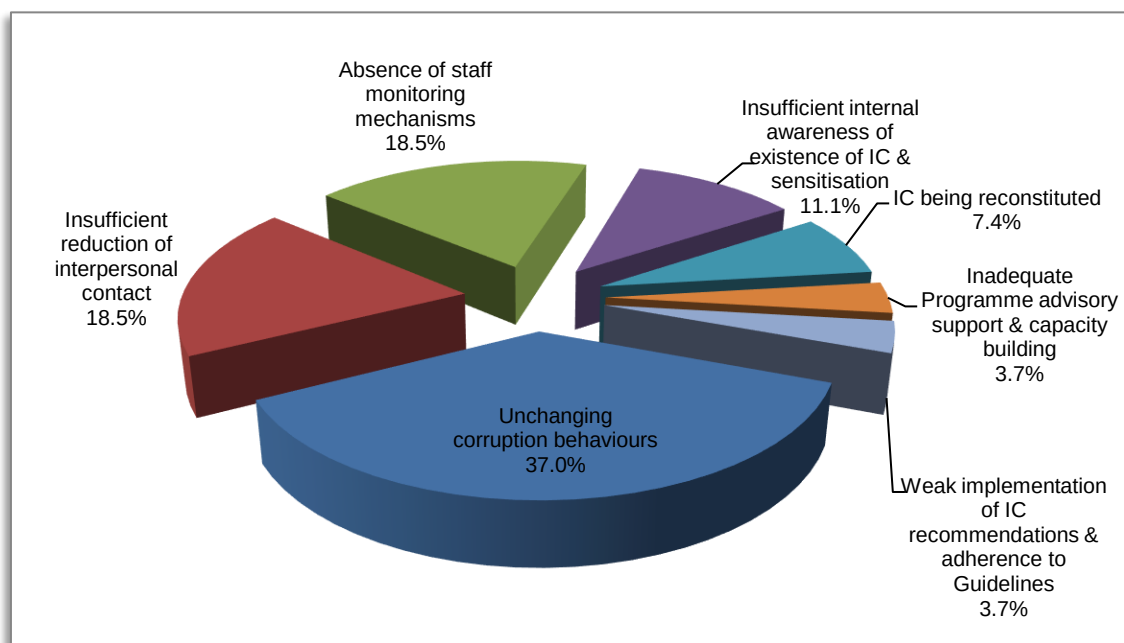


Figure 50.0 Integrity Committee Implementation Challenges - Impact

4.3 Other Perspectives - Integrity Committee CEO Forum

This section provides lessons and challenges from the Integrity Committee Chief Executive Officers' (CEO) Forum held in November 2023.

The lessons and challenges from the Forum are derived from 143 of the 188 responses, as there are 34 responses wherein an Integrity Committee had just been established, and 11 no responses. The succeeding sub-Sections discuss the Forum responses on effectiveness of the Integrity Committee in their institution; how the Programme can be improved; Programme challenges; how the Anti-Corruption Commission can enhance support to Integrity Committee; and, e-Governance migration .

4.3.1 Effectiveness of the Integrity Committee

Thirty-six point four percent (36.4%) of the respondents were of the view that the Integrity Committee in their institution was *effective*; 35.0, *moderate*; 21.7%, *very effective*; and 7.0%, *not effective* (Figure 51.0)

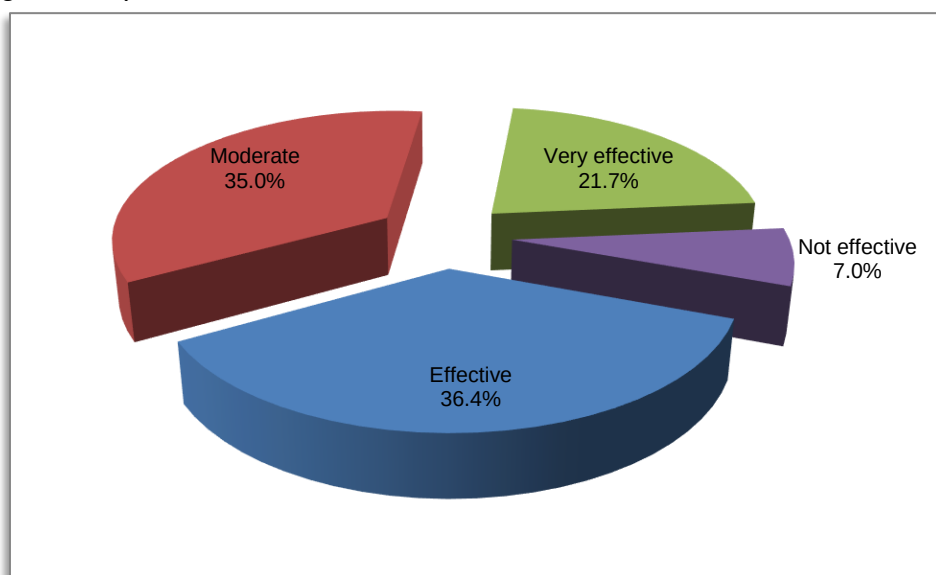


Figure 51.0 CEO Forum – Programme Effectiveness

The reasons provided for the view that the effectiveness of the Committee in their institutions was moderate and/or not effective reason are provided in Table 21.0 below. The most frequent reasons stated are membership turnover (30.8%), Committee being reconstituted (15.4%), and insufficient awareness and orientation (15.4%).

Table 21.0 CEO Forum – Programme Moderate & Non-Effectiveness Reason

Reason	No. of Responses	Relative
Membership turnover	8	30.8%
IC being reconstituted	4	15.4%
Insufficient awareness and orientation	4	15.4%
Budget constraints	3	11.5%
Programme is added responsibility/ad hoc	3	11.5%
Programme resistance/ill feelings	2	7.7%
Inadequate management support	1	3.8%
Inadequate interaction & information sharing between ACC & committees	1	3.8%

Total	26	100.0%
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Notable in Table 20.0 is that the CEO Forum corroborates the shortcomings and/or risks to Programme performance established in Programme evaluation, in particular membership turnover; reconstitution of the Committees; budget constraints; insufficient internal awareness of existence of IC and sensitisation; programme is added responsibility/ad hoc; insufficient willingness to institute the Committee (inadequate management support); and, inadequate Programme advisory support and capacity building.

4.3.2 Programme Improvement

The most frequent suggestions on how the Programme can be improved to enhance corruption prevention in the respective institutions are training, sensitisation and awareness (37.3%); budget prioritisation (10.5%); and enhancing internal engagement (9.8%), as shown in Figure 52.0 below.

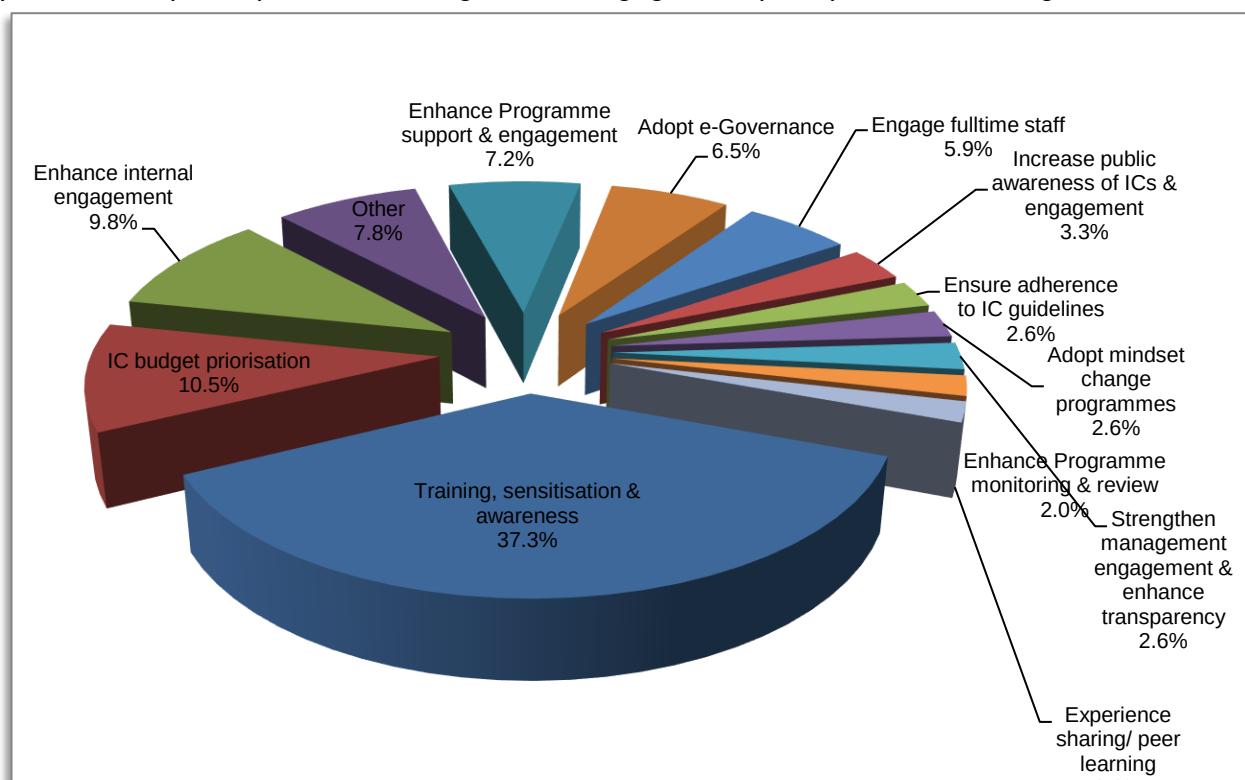


Figure 52.0 CEO Forum – Programme Improvement

The other suggested ways of improving the Programme are instituting handover guidelines; providing incentives to IC members; having institution-specific interventions (also noted as a challenge in the Programme evaluation, which states, Programme objectives are not institution-specific); scaling-up Anti-Corruption activities; enhancing client-focussed interventions; expanding the mandate of the Committees; having an inclusive Committee membership structure (noted as structure is not suitable in the Evaluation); and, increasing harmonisation and compatibility with other units.

4.3.3 Programme Challenges

The challenges the Committees currently face in carrying out their activities effectively of 132 responses are mostly the lack of Integrity Committees having funding, 27.3%; lack of consistency/continuity due to trained membership turnover, 22.7%; the Programme is a demand on staff's contractual workplace responsibilities, 15.2%; lack of a dedicated fulltime Secretariat,

8.3%; an antipathetic environment⁴⁰, 8.3%; and that the Programme activities demand competes with other institutional demands, 7.6% (Figure 53.0).

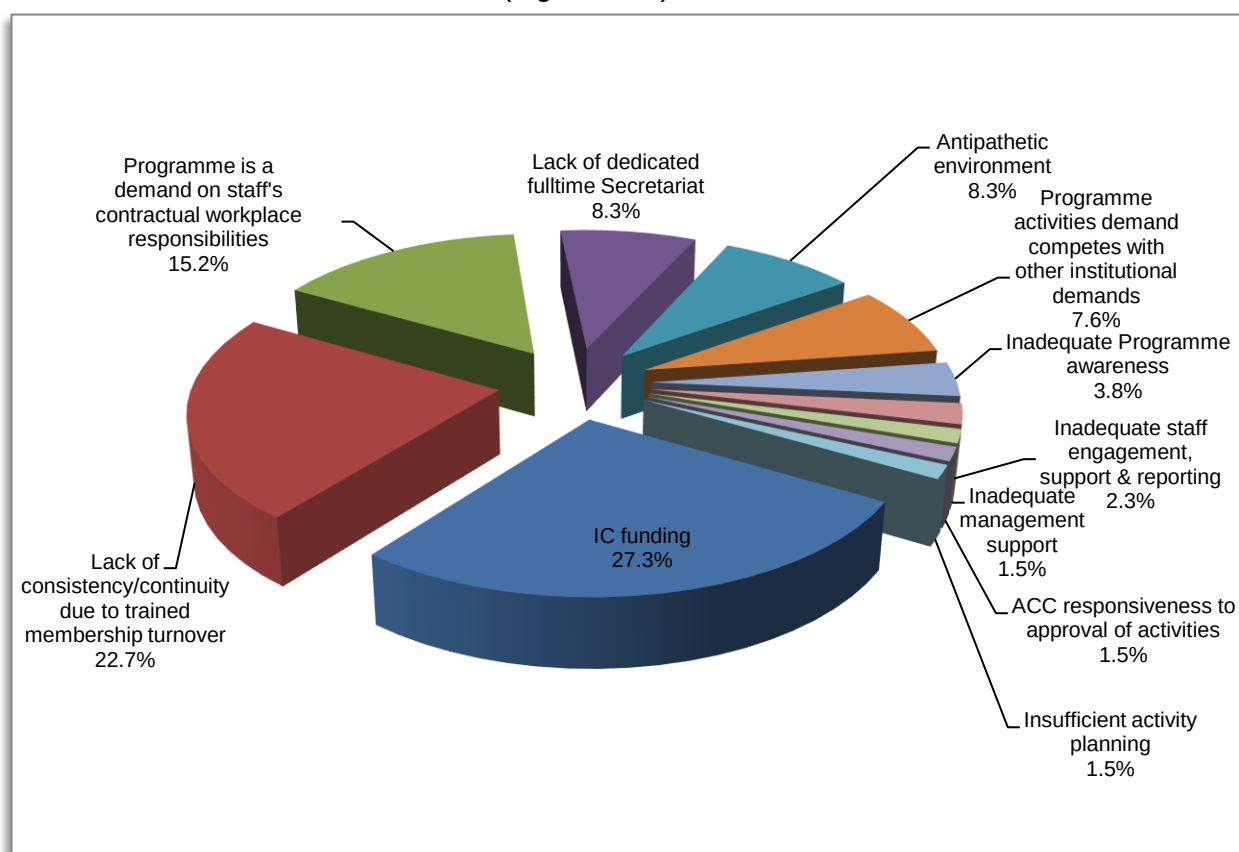


Figure 53.0 CEO Forum – Programme Challenges

4.3.4 Programme Support Enhancement

2023 CEO Forum suggestions as to how the ACC can enhance its support to respective Integrity Committees are that there is need for responsive ACC/Desk Officer monitoring, engagement, collaboration and technical support (47.3%); Conducting responsive targeted Programme capacity building (e.g., for boards, senior management) (28.1%); undertaking Programme reviews/monitoring in specified time periods (8.2%); provision of anti-corruption information and experience sharing (6.8%); conducting responsive targeted Programme awareness (2.1%); engaging in Programme spot checks (2.1%); ensuring adherence to Programme guidelines (1.4%); increasing the number of Programme desk officers (1.4%); partnership facilitation (1.4%); and, providing timely feedback on referred cases/reports timely feedback on referred cases (1.4%), as shown in Figure 54.0 below.

⁴⁰ Antipathetic environment means an environment characterized by antagonism or antipathy.

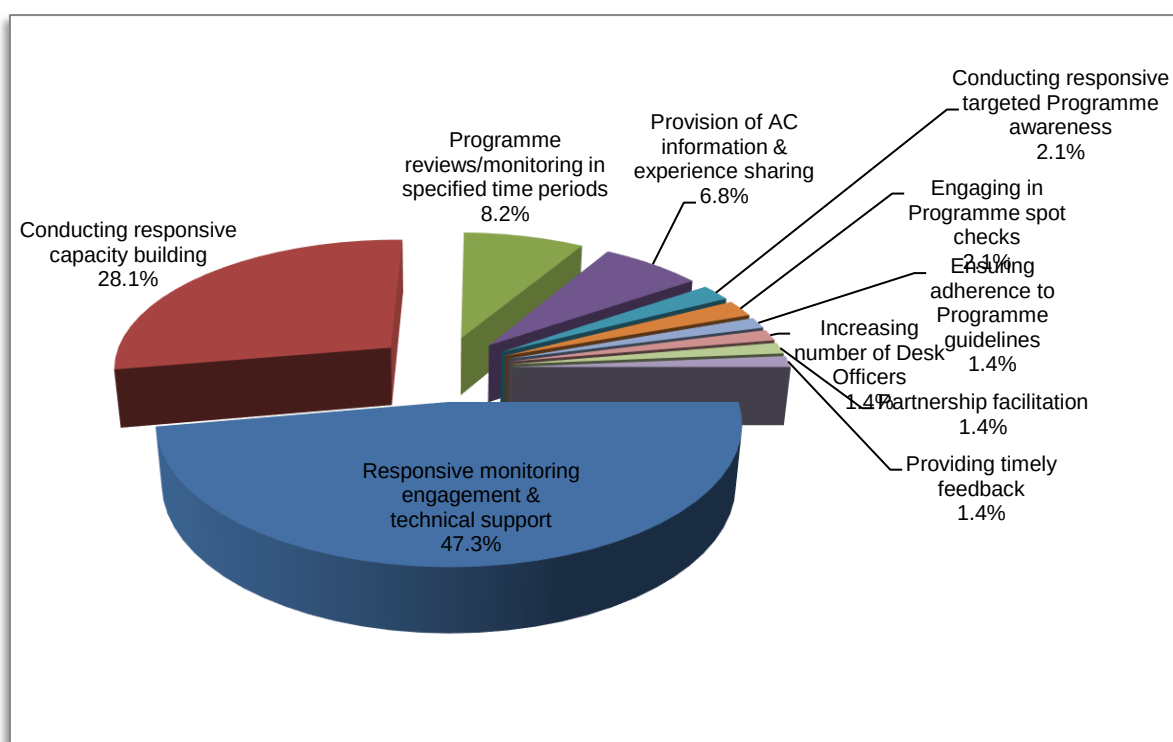


Figure 54.0 CEO Forum – Programme Support Enhancement

Other suggestions, in verbatim, are:

- (a) ACC should budget to support financially at least some of the key planned activities;
- (b) By lobbying government to create independent Ethics Units to deal with integrity matters;
- (c) Lobby for more funding for the ICs/ Lobby relevant authority for dedicated funding to IC activities/Lobby for us from CEO for financial support;
- (d) Request treasury to create positions of secretariat of the committee and secure funding;
- (e) Share the cost associated with effectively running the affairs of the Committee with the Company;
- (f) There should be a circular that Integrity Committee should be supported on their activities; and,
- (g) Through allocation of funding from the grants, Secretary to the Cabinet to instruct institutions to allow a budget allocation for IC programs.

4.3.5 e-Governance Migration

With respect to the question whether respondent's institution has considered migrating service provision to electronic platforms (e-Governance)⁴¹, 59.3% of 118 responses indicated that they have considered doing so, and are already implementing the platforms; 29.7, that it is in process; and 11.0% have not.

⁴¹ That is, adoption of the use of Information and Communication Technology to enhance work efficiency and improve service delivery in order to meet the needs of the public in a responsive and transparent manner (Electronic Government Act, 2021).

4.4 Implementation of 2015 ICPE Recommendations

What is most observed from the assessment of the implementation of the 2015 Integrity Committee programme evaluation is that recommendations that were accepted and implemented by most institutions are:

- (a) IC structure should not be pre-set but rather respond to the different institutional needs.
- (b) Job descriptions of officials that qualify to be appointed as IC members should include the work of the IC programme.
- (c) Increase funding and the timely release of such funds for ICs to be implemented and operate effectively, as a number of institutions have budget constraints as a result of insufficient budgetary allocations towards IC related activities.
- (d) Ensure that the process of reporting corruption is adequately publicised.
- (e) Increase awareness levels among both the public officials and general public on where to report cases of unethical conduct/corruption.
- (f) Reengineer some of the administration aspect which include, the provision of clear service information, quicken the process of attending to inquiries or issuance of the services.
- (g) Display visual information on how to report corruption in the customer waiting rooms and service points.
- (h) Educate both the general public and public official on the dangers and importance of reporting unethical conduct/corruption.
- (i) Introduce electronic systems in servicing the general public in order to limit physical interactions between service seekers and service providers as a means of reducing opportunities for corruption and increasing customer satisfaction.
- (j) Coordinate and synergize the efforts of all stakeholders including the communities, state institutions, civil society, international organizations and most importantly the donor community.
- (k) Institutions to take ownership on the implementation of ICs by institutionalising the IC programme through the creation of an office/position to manage the day to day administration of the IC activities
- (l) Promote external partnerships to create strong and stable institutional linkages.
- (m) Continuous training of the ICs members and public official through capacity building to create a pool of trainers to help in the training of new staff.

The recommendation that was accepted, but not implemented is creation of a permanent position with clear job description for an officer to manage the day to day administration work of the IC; and, the one rejected is, that membership should include IC officers from other institutions to enhance transparency in the operations of the IC programme.

The reasons for not implementing or rejecting the recommendations were mostly budget constraints and lack of adequate resources.

5.0 Conclusions

In general, the 2023 Integrity Committee Programme evaluation shows that the cross functionality of the committees' goal of institutionalising the prevention of corruption and malpractices within the respective institutions is satisfactory. This is, in particular, because there are minor observed shortcomings in the Programme relevance, coherence, efficiency, and impact.

In addition, the sustainability of the Programme has minimal risks to it continuing into the foreseeable future, as some benefits are observable.

5.1 Relevance

Although there are minor observed shortcomings in Programme relevance, there are no observed shortcomings in how well the Programme is designed in order to meet its overall objective with respect to consistency with policy and law, and the usefulness and value of Programme interventions. However, suitability of Programme design and implementation comparatively has major observed shortcomings.

5.2 Coherence

Minor shortcomings are observable with respect to how well Integrity Committee Programme interventions are aligned with other interventions implemented by an institution. However, shortcomings are most observable in the Committees not having a peripheral (unimportant) perspective; and, the extent to which the Programme interventions add value to the institution's work process, while avoiding duplication of effort and conflicts.

5.3 Efficiency

The extent to which the Programme interventions delivered, or likely delivered, intended results in a cost-effective manner, has no observed shortcomings. Except, comparatively, for minor observed shortcomings in the extent to which the cost of the Programme services or activities is reasonable in relation to the benefits.

5.4 Effectiveness

Effectiveness, the extent to which Integrity Committee Programme interventions have produced the desired results, comparatively has minor observed shortcomings, despite the dominance of severe observed shortcomings due to the high undesirable levels of lack of awareness of Integrity Committees among members of the public.

In addition, neither minor nor major observed shortcomings are also observable in service provision improvement and Customer Service Centre helpfulness in the institutions. This means that, not much has changed in these two interventions.

Major shortcomings are observed in Committees' development of Annual Corruption Prevention Action Plan and Quarterly Progress Reports (QPR) and their submission to the Anti-Corruption Commission (ACC), thereof; members of the public knowledge of existence of a service delivery charter in institutions; and the unsatisfactory introduction of Codes of Ethics in the Public Service and the Local Government institutions despite the fact that, there is a Code of Ethics for the Public Service and Local Government. The latter is indicative of low adherence to operationalisation of the Code through notification and Sensitisation of the Code.

5.5 Impact

There are minor observed shortcomings on the extent to which Integrity Committees have made a difference on corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) experiences in the institutions is satisfactory.

However, although the institutions noted that the extent to which members of the public can access a public service without being vulnerable to corruption and malpractices has minor shortcomings, members of the public assert the contrary, which is there are severe shortcomings.

In addition, noteworthy is that, although actual experiences of corruption or malpractices are low, reporting of such experiences is still unsatisfactory.

Lastly, equality in accessing a public service is hindered by mostly lack of adapted infrastructure, prioritisation policies, behavioural marginalisation, and insufficient adapted guidelines and/or instructions.

5.6 Sustainability

With respect to Programme sustainability, there are minimal risks to the Programme continuing into the foreseeable future, because some benefits are observable.

However, the extent to which Programme implementing institutions have gained the ability to independently continue implementing the Programme is comparably that there are moderate risks, but expectations are that at least some benefits will be sustained due to the progress made in Programme implementation so far.

5.7 Implementation of 2015 ICPE Recommendations

Overall the implementation of the recommendations of the 2015 Integrity Committee programme evaluation is satisfactory, as most recommendations were accepted and implemented, except for recommendations on creation of a permanent position with clear job description for an officer to administrate work of Integrity Committees; and, that membership should include officers from other institutions to enhance transparency in the operations of the IC programme.

6.0 Cabinet Office Response

The Integrity Committee Programme oversight is provided by the Secretary to Cabinet. Thereof, the Office of the Secretary to Cabinet is responsible for ensuring Programme coherence, efficiency, effectiveness and sustainability so that Ministries, Provinces and Spending Agencies (MPSAs) institute measures to reduce opportunities for corruption and related malpractices in their respective institutions.

Insights on the provision of program for the IC programme were solicited from the Secretary to Cabinet with respect to establishing the existence of a Programme oversight institutional framework; the Code of Ethics for the Public Service and Local Government; and, lessons learned.

The following were the comments:

1. *First*, there is no Programme oversight institutional framework in the Office of the Secretary to Cabinet, which inherently is a critical gap as this means the Secretary to Cabinet is not sufficiently informed of the programme's performance.

Hence, the Secretary to Cabinet's recognition that this is a gap that urgently needs to be addressed, through establishment of an Integrity Committee coordinator/unit at Cabinet Office who/which will be responsible for Programme liaison with MPSAs. The intended effect of such coordinator/unit on the programme being strengthening Programme oversight with respect, to among others, Programme involvement; definition of performance targets and monitoring framework⁴²; and, ensuring compliance and adherence to the Integrity Committee guidelines.

However, it was established that, with respect to Programme involvement, despite the lack of an oversight institutional framework the Secretary to Cabinet does provide direction and support to the Anti-Corruption Commission (ACC) when challenges arise; and inversely, the ACC also does provided propositions on direction and support to the Secretary to Cabinet, accordingly. In short, there is a mutually reinforcing Programme involvement between the Secretary to Cabinet and the ACC.

2. *Second*, based on the Evaluation findings on unsatisfactory introduction of the Code of Ethics for the Public Service and Local Government, the Secretary to Cabinet directed the Permanent Secretary heading the Public Service Management Division (PSMD) to engage SMART Zambia⁴³ in operationalising the Code.

The Secretary to Cabinet, in this regard, indicated that this should be done through provision of an online portal where all Public Service and Local Government employees acknowledge receipt of the Code; and in so doing such a portal will consequently be a means of sensitising the employees on the existence of the Code.

3. *Lastly*, the lessons learned, shared by the Secretary to Cabinet are the need for:
 - (a) An overarching Integrity Committee Programme coordination policy;
 - (b) Seamless integration of the Integrity Committee Programme with Management Development Division (MDD) and Public Service Management Division (PSMD) on implementation of service delivery improvement – specifically the need for uniformity in development of
 - (i) service delivery charters;
 - (ii) establishment of customer service centres; and,
 - (iii) organisational ethical and governance policies on Conflict of Interest, Whistleblowing, Gifts and Benefits and Complaints Handling;

⁴² It was noted that Permanent Secretaries' Integrity Committees performance review is being undertaken for 2023, since in 2022 the focus was on establishment of the Committees; and that deliverable targets are yet to be formulated.

⁴³ Smart Zambia Institute is a Division in the Office of the President which is charged with the responsibility of the management and promotion of electronic Government services and processes; facilitate access to electronic Government services to improve service delivery to enhance citizens' access to Government services, coordination of e-government and information and communication technology matters in public bodies. This is pursuant to the Electronic Government Act No. 41 of 2021.

- (c) And that, All Public institutions should have full-time ethics or integrity officers to ensure performance of the Programme interventions, and adherence to such interventions wherein it applies.

7.0 Recommendations

Table 22.0 below, provides the lessons and/or shortcomings from the Evaluation, and the consequent recommendations.

Table 22.0 Recommendations

No.	Lesson/ Shortcoming	Recommendation	Responsibility
1	Continued reconstitution of the Committees due to trained membership turnover.	Wherein the turnover is a result of transfers, there is need to institute handover guidelines and ensure adherence to, thereof.	Cabinet Office
		Previously trained IC members should become ex-officials in their new institution.	Management/CEO
2	Inadequate Programme advisory support and capacity building.	Enhance Programme advisory/technical support and responsive capacity building.	ACC
		Increase the number of Desk Officers	
3	Budget constraints.	Seek Cabinet/Treasury intervention on need for Programme activities budget prioritisation.	Cabinet Office ACC
			Management/CEO
4	Unchanging corruption/bribery behaviours.	Adopt mindset/behavioural change programmes.	ACC
		Enhance awareness of existence of service charters and Integrity Committees in institutions where they are in place.	Integrity Committees
		Scale up provision of anti-corruption information and experience sharing.	Cabinet Office
		Establish dedicated integrity or ethics units in institutions.	
5	Integrity Committee membership prescribed structure is not suitable for all institutions.	Ensure that membership of Integrity Committees is responsive to individual institutional needs.	ACC
		Ensure that membership structure is inclusive of all core units/departments in an institution, with particular emphasis on integrity units.	Cabinet Office
6	Insufficient Programme monitoring.	Institute responsive Programme monitoring and review mechanisms. (Programme reviews/monitoring in specified time periods).	ACC
		Engage in Programme spot checks.	
7	Weak implementation of IC recommendations and adherence to Guidelines, in particular development and submission of ACPAPs and QPRs.	Ensure adherence to Programme guidelines.	Cabinet Office
		Stipulate administrative sanctions for non-adherence to guidelines.	ACC
8	Insufficient internal and external awareness of existence of IC and sensitisation; and reporting malpractices to Committees, thereof.	Conduct responsive targeted IC Programme sensitisations activities to enhance internal (staff) and external (public) awareness.	Integrity Committees
		Conduct responsive capacity building.	ACC
9	Programme is a demand on staff's contractual workplace responsibilities and/or added responsibility hence its ad hoc nature.	Integrate Programme responsibilities into staff performance appraisals.	Cabinet Office
			Management/CEO
10	Lack of dedicated fulltime Secretariat.	Establish a fulltime Secretariat as provided for in the Programme guidelines.	Cabinet Office Management/CEO
11	Antipathetic environment due mostly to Integrity Committees having a peripheral (unimportant) perspective and insufficient	Ensure adherence to Programme guidelines.	Cabinet Office Management/CEO
		Strengthen management engagement and enhance transparency.	ACC

No.	Lesson/ Shortcoming	Recommendation	Responsibility
	willingness to institute Integrity Committees due to inadequate management support.	Conduct responsive targeted IC Programme sensitisation activities to enhance internal (staff) awareness.	Integrity Committees
12	Insufficient reduction of interpersonal contact.	Adopt e-Governance. That is, adoption of the use of Information and Communication Technology to enhance work efficiency and improve service delivery in order to meet the needs of the public in a responsive and transparent manner.	Management/CEO
13	Programme objectives are not institution-specific.	Adopt client-focused interventions.	ACC Management/CEO
14	Inadequate compatibility with other likely corruption prevention/integrity units.	Revise the membership structure to include all core units/departments in an institution, as a means of strengthening complementarity, harmonisation and co-ordination with other units within an institution.	ACC Cabinet Office
15	Lack of internal consultation and/or Inadequate staff engagement, support and reporting.	Strengthen management and Integrity Committee engagement and enhance transparency.	Integrity Committees Management/CEO ACC
16	Existence of inequalities in accessing a public service.	Strengthen adherence to regulations that make availability of adapted infrastructure mandatory.	Cabinet Office
		Develop and implement prioritisation policies and adapted guidelines and/or instructions for the vulnerable population.	Management/CEO
		Conduct awareness programmes on the effects of behavioural marginalisation.	Integrity Committees

In addition, from the Cabinet Office response, the consequent recommendations by Secretary to Cabinet on the Programme are:

- (a). Establishing an Integrity Committee coordinator/unit at Cabinet Office who/which will be responsible for Programme liaison with MPSAs;
- (b). The Permanent Secretary heading the Public Service Management Division (PSMD) to engage SMART Zambia in operationalising the Code of Ethics for the Public Service and Local Government.
- (c). Developing an overarching Integrity Committee Programme coordination policy;
- (d). Uniformity in development of service delivery charters; establishment of customer service centres; and in the development of organisational ethical and governance policies on Conflict of Interest, Whistleblowing, Gifts and Benefits and Complaints Handling; and,
- (e). All Public institutions to have full-time ethics or integrity officers to ensure performance of the Programme interventions, and adherence to such interventions wherein it applies.

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1. Garboan R. (2008). Introducing Program Evaluation Models. *Transylvanian Review of Administrative Sciences*, 22E/2008 pp. 44-50.
2. Guidelines on Integrity Committee Programme for Zambia (Revised 2021).
3. Transparency International Zambia and Anti-Corruption Commission (2019). *Zambia Bribe Payers Index Survey Report (ZBPI)*. Lusaka Zambia.
4. Transparency International Zambia and Anti-Corruption Commission (2022). *Zambia Bribe Payers Index (ZBPI) Survey Report*. Lusaka, Zambia.
5. Republic of Zambia (2022). *Handbook for Integrity Committees on Corruption Prevention*. Lusaka, Zambia.

Policies

- (a) Eighth National Development Plan (8NDP).
- (b) National Anti-Corruption Policy (NACP) and its Implementation Plan.

Laws

- (a) Anti-Corruption Act No. 3 of 2012.
- (b) Public Interest Disclosure (Protection of Whistle blowers) Act No. 4 of 2010.
- (c) Public Procurement Act No. 8 of 2020, Public Procurement Regulations, No. 30 of 2022.

Appendix I. KIIs - Data Collection Tool

Thank you for kindly accepting to spare some of your time for this interview. The Anti-Corruption Commission is conducting an evaluation of the Integrity Committee Programme. The Evaluation criteria is relevance; coherence; efficiency, effectiveness, impact, and sustainability of the Programme. The last evaluation was conducted in 2015, and thus the need to conduct another one.

We would like to assure you that your responses will be treated with the utmost confidentiality. And will be used only for the intended purpose, which is to get insight information on the implementation of the Integrity Committee Programme successes and challenges in order to improve implementation and its continued roll-out. And indeed, meet the Policy goal of the Integrity Committee Programme, which is that corruption prevention should be mainstreamed in the routine business of government agencies and the private sector by introducing Integrity Committees in public departments and at public points of service delivery.

We therefore would like to ask you to be open and free. And we will not take more than 45 minutes of your time.

1 Interview No:

2 Date of Interview/ Time:

3a	District	Coding	Instructions
	Chingola	1	
	Chipata	2	
	Choma	3	
	Kabwe	4	
	Kalomo	5	
	Kasama	6	
	Kitwe	7	
	Livingstone	8	
	Luanshya	9	
	Lusaka	10	
	Mansa	11	
	Mazabuka	12	
	Ndola	13	
	Solwezi	14	
3b	Institution	Coding	Instructions
	Kabwe Municipal Council	1	
	Lukanga Water and Sanitation Company	2	
	Konkola Copper Mines*	3	
	Kitwe City Council	4	
	Nkana Water and Sanitation Company	5	
	Luanshya Municipal Council	6	
	Ndola City Council	7	
	Zambia Forestry and Forest Industries Corporation (ZAFFICO)	8	
	Chipata City Council	9	
	Chipata General Hospital	10	
	Mansa Municipal Council	11	
	Provincial Administration	12	
	Citizen Economic Empowerment Commission	13	
	Higher Education Loans and Scholarships Board (HELSEB)	14	
	Immigration Department	15	
	UTH - Women and Unborn	16	
	Local Authorities Superannuation Fund Superannuation (LASF)	17	
	Lusaka City Council	18	

	Ministry of Lands		19	
	National Health Insurance Management Authority (NHIMA)		20	
	National Institute of Public Administration (NIPA)		21	
	National Pension Scheme Authority (NAPSA)		22	
	National Registration, Passports and Citizenship - NR		23	
	National Registration, Passports and Citizenship - Passports		24	
	National Road Fund Agency		25	
	Patent and Company Registration Agency (PACRA)		26	
	Public Service Pension Fund		27	
	Road Transport and Safety Agency		28	
	University Teaching Hospital (UTH) - Adult Hospital		29	
	UTH - Children's Hospital		30	
	Zambia Police Service		31	
	Judiciary		32	
	Zambia Revenue Authority		33	
	ZESCO Limited		34	
	Kasama Municipal Council		35	
	Chambeshi Water Supply and Sanitation Company		36	
	Northwestern Water and Sanitation Company		37	
	Solwezi Municipal Council		38	
	Choma City Council		39	
	Choma General Hospital		40	
	Livingstone City Council		41	
	Livingstone General Hospital		42	
	Mazabuka Municipal Council		43	
	Zambia Sugar PLC		45	
4	Official position of person(s) responding		Coding	Instructions
	Head of Institution / Chief Executive Officer		1	
	Integrity Committee member (Chairperson & Other)		2	
	Staff member (non IC members)		3	
	Focal Point Persons - Immigration Department (Ndola, Livingstone)		4	
	Focal Point Persons - NAPSA (Ndola)		5	
	Focal Point Persons - RTSA (Ndola, Livingstone)		6	
	Focal Point Persons - ZRA (Chipata, Livingstone, Ndola)		7	
5	What is your level of knowledge of the recommendations proposed in the 2015 Integrity Committee Programme Evaluation Report?	Very high	1	
		High	2	
		Moderate	3	
		Low	4	
		Very low	5	
		None	6	

Section 1. Implementation of Recommendations in the 2015 Evaluation Report

This Section assesses the extent to which recommendations in the 2015 evaluation report of the IC Programme were implemented by various institutions, which includes your institution.

6	Implementation of Integrity Committees	
	Which of the following recommendations on the implementation of Integrity Committees(ICs) were accepted; and, implemented	

6A	The IC structure should not be pre-set but rather respond to the different institutional needs.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
6B	Membership should include IC officers from other institutions to enhance transparency in the operations of the IC programme.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
6C	Create a permanent position with clear job description for an officer to manage the day to day administration work of the IC.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
6D	Job descriptions of officials that qualify to be appointed as IC members should include the work of the IC programme.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	

		No response	4	
6E	Increase funding and the timely release of such funds for ICs to be implemented and operate effectively, as a number of institutions have budget constraints as a result of insufficient budgetary allocations towards IC related activities.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
6F	For the accepted but not implemented recommendations, what were the reasons for not doing so?			
	INSERT RESPONSE			
6G	For the rejected recommendations, what were the reasons for doing so?			
	INSERT RESPONSE			
7	Relevance of the IC programme			
	Which of the following recommendations on the relevance of Integrity Committees (ICs) were accepted; and, implemented			
7A	Ensure that the process of reporting corruption is adequately publicised.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	

7B	Increase awareness levels among both the public officials and general public on where to report cases of unethical conduct/corruption.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
7C	For the accepted but not implemented recommendations, what were the reasons for not doing so?			
	INSERT RESPONSE			
7D	For the rejected recommendations, what were the reasons for doing so?			
	INSERT RESPONSE			
8	Effectiveness of the IC programme			
	Which of the following recommendations on the effectiveness of Integrity Committees (ICs) were accepted; and, implemented			
8A	Reengineer some of the administration aspects which include, the provision of clear service information, quicken the process of attending to inquiries or issuance of the services.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
8B	Display visual information on how to report corruption in the customer waiting rooms and service points.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
8C	Educate both the general public and public official on the dangers and importance of reporting unethical conduct/corruption.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
8D	For the accepted but not implemented recommendations, what were the reasons for not doing so?			
	INSERT RESPONSE			
8E	For the rejected recommendations, what were the reasons for doing so?			
	INSERT RESPONSE			
9	Impact of the IC programme			
	Which of the following recommendations on the impact of Integrity Committees (ICs) were accepted; and, implemented			
9A	Introduce electronic systems in servicing the general public in order to limit physical interactions between service seekers and service providers as a means of reducing opportunities for corruption and increasing customer satisfaction.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	

9B	Coordinate and synergize the efforts of all stakeholders including the communities, state institutions, civil society, international organizations and most importantly the donorcommunity.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
9D	For the accepted but not implemented recommendations, what where the reasons for notdoing so?			
	INSERT RESPONSE			
9E	For the rejected recommendations, what where the reasons for doing so?			
	INSERT RESPONSE			
10	Sustainability of the IC programme			
	Which of the following recommendations on the sustainability of Integrity Committees(ICs) were accepted; and, implemented			
10A	Institutions to take ownership on the implementation of ICs by institutionalising the IC programme through the creation of an office/position to manage the day to day administration of the IC activities.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
10B	Promote external partnerships to create strong and stable institutional linkages.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
10C	Continuous training of the ICs members and public official through capacity building to create a pool of trainers to help in the training of new staff.	Accepted & Implemented	1	
		Accepted BUT not implemented	2	
		Rejected	3	
		No response	4	
10D	For the accepted but not implemented recommendations, what where the reasons for notdoing so?			
	INSERT RESPONSE			
10E	For the rejected recommendations, what where the reasons for doing so?			
	INSERT RESPONSE			

Section 2. Relevance of the IC programme

Programme relevance is conceptualised as the degree to which the objectives of a programme are, or remain, pertinent, significant and worthwhile, in relation to the identified needs. That is, whether the interventions put in place result in the desired effect or change. Relevance also considers whether the structural and/or institutional setup of the programme meets its goal or objective, which is design.

			Coding	Instructions
11	To what extent is the Integrity Committee Programmedesign and implementation suitable in mainstreaming corruption prevention in the routine business of your institutions?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	

	Structure, membership criteria, roles & responsibilities	Very small extent	5	
		No response	6	
12	If response to Q11 is Small extent and Very small extent, solicit more responses as to why that is the case.			
13	To what extent are the objectives of the Programme relevant to corruption prevention needs and priorities of your institution?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	

		No response	6	
14	To what extent are the objectives of the Programme consistent with the priorities for Anti-corruption in your institution?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
15	If response to Q14 is Small extent and Very small extent, solicit more responses as to why that is the case.			
16	Do you agree with view that Integrity Committee Programme interventions are useful and valuable?	Strongly agree	1	
		Agree	2	
		Neither agree nor disagree	3	
		Disagree	4	
		Strongly disagree	5	
		No response	6	
17	To what extent are activities and outputs of the IC Programme, like Customer Service Centres, Service Delivery Charters, Complaints Handling Mechanisms, consistent with the overall goal and the attainment of its objectives?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
18	Are the activities and outputs of the ICs consistent with the intended impacts and effects, like awareness of where to report cases of unethical conduct/ corruption within the institution?	Always	1	
		Often	2	
		Sometimes	3	
		Rarely	4	
		Never	5	
		No response	6	

Section 3. Coherence of the IC programme

Coherence interrogates how well the Integrity Committee programme interventions fit into, first, the wider policy frameworks of the implementing institutions and their alignment with other interventions implemented by the institution, for example internal affairs units (internal coherence).

			Coding	Instructions
19	To what extent are the Integrity Committee Programme interventions compatible with other public service delivery	To a very large extent	1	
		Large extent	2	

	interventions in the institution?	Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
20	If response to Q19 is Small extent and Very small extent , solicit more responses on the other public delivery interventions in the institution.			
	INSERT RESPONSE			
21	Are there synergies (working together) and interlinkages between the Programme interventions and other public service delivery interventions carried out by the institution?	Yes	1	
		No	2	
		No response	3	
22	To what extent is there complementarity (a relation of mutual dependence or action or influence) of IC interventions with other public service delivery interventions within the institution?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
23	To what extent is there harmonisation of IC interventions with other public service delivery interventions within the institution?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
24	To what extent is there co-ordination of IC interventions with other public service delivery interventions within the institution?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
25	To what extent does the Integrity Committee Programme in the institution have a peripheral (unimportant) perspective? That is, the IC does not have an institution-centric perspective.	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
26	If response to Q25 is Very large extent and Large extent , solicit more responses on why this is the case.			
	INSERT RESPONSE			
27	To what extent do the Integrity Committee Programme interventions add value to the institution's work process, while avoiding duplication of effort and conflicts?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
28	If response to Q27 is Very large extent and Large extent , solicit more responses on why this is the case.			
	INSERT RESPONSE			

29	Are the objectives of the IC Programme seamless (corresponding in size, degree or extent and having no	Yes	1	
		No	2	
	due demands) with the institutional capacity conditions?	No response	3	
30	If response to Q29 is No, solicit more responses on why this is the case.			
	INSERT RESPONSE			

Section 4. Efficiency of the IC programme

Efficiency is conceptualized as the extent to which the Programme interventions deliver, or likely delivers, intended results in a cost-effective manner.

			Coding	Instructions
31	Are the funds allocated to the Integrity Committee used for the intended interventions/purpose?	Always	1	
		Often	2	
		Sometimes	3	
		Rarely	4	
		Never	5	
		No response	6	
32	If response to Q33 is Rarely and Never , solicit more responses on why this is the case.			
	INSERT RESPONSE			
33	To what extent were the cost of the Integrity Committee Programme services or activities reasonable in relation to the benefits?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
34	Do you agree that the introduction of the Integrity Committee Programme is the most cost-effective way of fighting corruption in public and private institutions compared to other alternatives?	Strongly agree	1	
		Agree	2	
		Neither agree nor disagree	3	
		Disagree	4	
		Strongly disagree	5	
		No response	6	

Section 5. Effectiveness of the IC programme

Effectiveness measures the extent to which interventions achieve the objectives of a programme or project

			Coding	Instructions
35	Has the Integrity Committee introduced interventions that have had the intended result or striking effect on the reduction of corruption and malpractices in the institution?	Yes	1	
		No	2	
		No response	3	
36	If response to Q39 is Yes , which of the following interventions have been introduced in your institution?	Service Delivery Charters	1	Multiple responses allowed
		Code of Ethics	2	
		Code of Conduct	3	
		Conflict of Interest Policy	4	
		Whistleblower Policy	5	
		Gifts and Benefits Policy	6	
37	Has the Integrity Committee developed mechanisms for receiving and providing redress on all complaints emanating from within and outside the organisation relating to ethical issues and hindrances to efficient and effective service delivery?	Yes	1	
		No	2	
		No response	3	
38	If response to Q41 is Yes , which of the following interventions have been introduced in your institution?	Customer Service Centre	1	Multiple

		Complaints Handling Systems	2	responses allowed
		Other (Specify)	3	
		Other (Specified)		
39	Where there are aspects of the Programme that could have been done differently (process effectiveness)?	Yes	1	
		No	2	
		No response	3	
40	If response to Q43 is Yes, give examples of Programme activities which were done differently to ensure effectiveness.			
	INSERT RESPONSE			

Section 6. Impact of the IC programme

Impact is conceptualised as a measure of change in the environment as a consequence of achieving the purpose of project interventions. That is, what difference the interventions have made

			Coding	Instructions
41	To what extent do you agree with the following statement? Members of staff are able to provide services without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours).	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
42	If response to Q49 is Small extent and Very small extent , solicit more responses on why this is the case.			
	INSERT RESPONSE			
43	To what extent do you agree with the following statement? Members of the public can access a public service in the institution without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours).	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
44	If response to Q51 is Small extent and Very small extent , solicit more responses on why this is the case.			
	INSERT RESPONSE			
45	To what extent have IC programme interventions resulted in a positive change in members of staff's and the public's attitudes towards reporting bribery experiences and unethical behaviours?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	

Section 7. Sustainability of the IC programme

Sustainability asks the question - will the benefits last? That is, it is a measure of the extent to which the net benefits of a programme or project intervention continue or are likely to continue.

			Coding	Instructions
46	To what extent will the benefits of the Programme likely continue?	To a very large extent	1	
		Large extent	2	
		Moderate	3	

		Small extent	4	
		Very small extent	5	
		No response	6	
47	If response to Q56 is Moderate, Small extent, and Very small extent , solicit more responses on why this is the case.			
	INSERT RESPONSE			
48	To what extent can the Programme, AS IT IS , likely continue to result in reduction of vulnerabilities to corruption (bribery) and related malpractices (unethical, illegal, or negligent professional behaviours) in public and private institutions?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
49	If response to Q58 is Moderate, Small extent, and Very small extent , solicit more responses on why this is the case.			
	INSERT RESPONSE			
50	To what extent have Integrity Committee Programme implementing institutions gained the ability to independently continue implementing the Programme?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
51	If response to Q60 is Moderate, Small extent, and Very small extent , solicit more responses on why this is the case.			
	INSERT RESPONSE			

Appendix II. Target Institutions by Public Sector Function

Public Sector Function/Institution	No. of Institutions	Relative
Local Government	13	31.0%
Chipata City Council		
Choma Municipal Council		
Kabwe Municipal Council		
Kalomo Municipal Council		
Kasama Municipal Council		
Kitwe City Council		
Livingstone City Council		
Luanshya Municipal Council		
Lusaka City Council		
Mansa Municipal Council		
Mazabuka Municipal Council		
Ndola City Council		
Solwezi Municipal Council		
Public Service	13	31.0%
Chipata General Hospital		
Choma General Hospital		
Immigration Department		
Judiciary		
Livingstone General Hospital		
Ministry of Lands		
National Registration, Passports and Citizenship - NRC		
National Registration, Passports and Citizenship - Passports		
Provincial Administration - Northwestern		
University Teaching Hospital (UTH) - Adult Hospital		
UTH - Children's Hospital		
UTH - Women and Unborn		
Zambia Police Service		
Quasi Government	16	38.1%
Chambeshi Water Supply and Sanitation Company		
Citizen Economic Empowerment Commission (CEEC)		
Higher Education Loans and Scholarships Board (HELSB)		
Local Authorities Superannuation Fund Superannuation (LASF)		
Lukanga Water and Sanitation Company		
National Health Insurance Management Authority (NHIMA)		
National Institute of Public Administration (NIPA)		
National Pension Scheme Authority (NAPSA)		
National Road Fund Agency (NRFA)		
Patent and Company Registration Agency (PACRA)		
Public Service Pension Fund (PSPF)		
Road Transport and Safety Agency (RTSA)		
Workers' Compensation Fund Control Board (WCFCB)		
Zambia Forestry and Forest Industries Corporation (ZAFFICO)		
Zambia Revenue Authority (ZRA)		
ZESCO Limited		
Grand Total	42	100.0%

Appendix III. KIIs - Districts, Target Institutions and Sample

District/Institution	No. of Respondents
Chipata	11
Chipata City Council	5
Chipata General Hospital	6
Choma	10
Choma City Council	5
Choma General Hospital	5
Kabwe	10
Kabwe Municipal Council	6
Lukanga Water and Sanitation Company	4
Kalomo	5
Kalomo Municipal Council	5
Kasama	10
Chambeshi Water Supply and Sanitation Company	5
Kasama Municipal Council	5
Kitwe	6
Kitwe City Council	5
Workers' Compensation Fund Control Board (WCFCB)	1
Livingstone	13
Immigration Department	1
Livingstone City Council	5
Livingstone General Hospital	5
Road Transport and Safety Agency (RTSA)	1
Zambia Revenue Authority (ZRA)	1
Luanshya	3
Luanshya Municipal Council	3
Lusaka	95
Citizen Economic Empowerment Commission (CEEC)	4
Higher Education Loans and Scholarships Board (HELSB)	5
Judiciary	3
Local Authorities Superannuation Fund Superannuation (LASF)	5
Lusaka City Council	5
Ministry of Lands	5
National Health Insurance Management Authority (NHIMA)	5
National Institute of Public Administration (NIPA)	5
National Pension Scheme Authority (NAPSA)	5
National Registration, Passports and Citizenship - NRC	3
National Registration, Passports and Citizenship - Passports	2
National Road Fund Agency (NRFA)	5
Patent and Company Registration Agency (PACRA)	5
Public Service Pension Fund (PSPF)	5
Road Transport and Safety Agency (RTSA)	5
University Teaching Hospital (UTH) - Adult Hospital	5
UTH - Children's Hospital	5
UTH - Women and Unborn	5
Zambia Police Service	5

Zambia Revenue Authority (ZRA)	4
ZESCO Limited	4
Mansa	5
Mansa Municipal Council	5
Mazabuka	5
Mazabuka Municipal Council	5
Ndola	6
Ndola City Council	2
Road Transport and Safety Agency (RTSA)	1
Zambia Forestry and Forest Industries Corporation (ZAFFICO)	2
Zambia Revenue Authority (ZRA)	1
Solwezi	7
Provincial Administration - Northwestern	3
Solwezi Municipal Council	4
Grand Total	186

Appendix IV. Exit Polls Data Collection Tool

Thank you for kindly accepting to spare some of your time for this interview. The Anti-Corruption Commission is conducting an evaluation of the Integrity Committee Programme.

An Integrity Committee (IC) is an internal institutional structure meant to institutionalise the prevention of corruption and related malpractices. IC members are therefore, members of staff who are tasked with taking steps to prevent corruption within their institution. They are responsible for enhancing integrity through various preventive measures. The IC is premised on the notion that each institution should be responsible for preventing corruption from occurring within its system.

CONFIDENTIALITY

We would like to assure you that your responses will be treated with the utmost confidentiality. And will be used only for the intended purpose, which is to get insight information on the implementation of the Integrity Committee Programme successes and challenges in order to improve implementation and its continued roll-out. And indeed, meet the Policy goal of the Integrity Committee Programme, which is that corruption prevention should be mainstreamed in the routine business of government agencies and the private sector by introducing Integrity Committees in public departments and at public points of service delivery

We therefore would like to ask you to be open and free. And we will not take more than 45 minutes of your time.

CONSENT

Please note that you can refuse to answer questions and can withdraw from participating at any time, without having to give a reason.

I have understood the purpose of the Anti-Corruption Commission Integrity Committee Programme Evaluation data collection being undertaken; and, I herein **voluntarily consent** to be a respondent, and understand that I can refuse to answer questions and I can withdraw from participating at any time, without having to give a reason.

YES

- 1 **Interview No:**
- 2 **Date of Interview/ Time:**
- 3 **Name of Research Assistant:**

4a	District	Coding	Instructions
	Chingola	1	
	Chipata	2	
	Choma	3	
	Kabwe	4	
	Kalomo	5	
	Kasama	6	
	Kitwe	7	
	Livingstone	8	
	Luanshya	9	
	Lusaka	10	
	Mansa	11	
	Mazabuka	12	
	Ndola	13	
	Solwezi	14	
4b	Institution	Coding	Instructions
	Kabwe Municipal Council	1	
	Lukanga Water and Sanitation Company	2	
	Konkola Copper Mines*	3	
	Kitwe City Council	4	

Nkana Water and Sanitation Company	5
Luanshya Municipal Council	6
Ndola City Council	7
Zambia Forestry and Forest Industries Corporation (ZAFFICO)	8
Chipata City Council	9
Chipata General Hospital	10
Mansa Municipal Council	12
Provincial Administration	13
Citizen Economic Empowerment Commission	14
Higher Education Loans and Scholarships Board (HELSB)	15
Immigration Department	16
UTH - Women and Unborn	17
Local Authorities Superannuation Fund Superannuation (LASF)	18
Lusaka City Council	19
Ministry of Lands	20
National Health Insurance Management Authority (NHIMA)	21
National Institute of Public Administration (NIPA)	22
National Pension Scheme Authority (NAPSA)	23
National Registration, Passports and Citizenship - NR	24
National Registration, Passports and Citizenship - Passports	25
National Road Fund Agency	26
Patent and Company Registration Agency (PACRA)	27
Public Service Pension Fund	28
Road Transport and Safety Agency	29
University Teaching Hospital (UTH) - Adult Hospital	30
UTH - Children's Hospital	31
Zambia Police Service	33
Judiciary	34
Zambia Revenue Authority	35
ZESCO Limited	36
Kasama Municipal Council	37
Chambeshi Water Supply and Sanitation Company	38
Northwestern Water and Sanitation Company	39
Solwezi Municipal Council	40
Choma City Council	41
Choma General Hospital	42
Livingstone City Council	43
Livingstone General Hospital	44
Mazabuka Municipal Council	45
Zambia Sugar PLC	46

Respondent Characteristics

			Coding	Instructions
5	Sex of respondent	Male	1	
		Female	2	
6	Age of respondent (as at last birthday)	18-25	1	
		26-35	2	

		36-45	3	
		46-55	4	
		56-65	5	
		More than 65	6	
		No response	7	
7	Highest level of education attained	Not been to school	1	
		Pre-school	2	
		Primary (Grade 1 - 7)	3	
		Basic (Grade 8 and 9)	4	
		High school (Grade 10 – 12)	5	
		Tertiary	6	
		No response	7	
8	Employment status in the last 12 months	Employer	1	
		Employed Public sector	2	
		Employed Private sector	3	
		Self employed	4	
		Student	5	
		Unemployed	6	
		Retired	7	
		No response	8	
9	Do you have any disabilities?	YES	1	
		NO	2	

Section 1. Relevance of the IC programme

Programme relevance is conceptualised as the degree to which the objectives of a programme are, or remain, pertinent, significant and worthwhile, in relation to the identified needs. That is, whether the interventions put in place result in the desired effect or change.

10	Do you agree with view that Integrity Committees are useful and valuable?	Strongly agree	1	
		Agree	2	
		Neither agree nor disagree	3	
		Disagree	4	
		Strongly disagree	5	
		No response	6	

Section 2. Effectiveness of the IC programme				
Effectiveness measures the extent to which interventions achieve the objectives of a programme or project. It is an aggregate measure of the extent to which an intervention has achieved or is expected to achieve relevant and sustainable impacts, efficiently and coherently.				
11	Are you aware or heard of Integrity Committees?	Extremely aware	1	
		Moderately aware	2	
		Somewhat aware	3	
		Slightly aware	4	
		Not at all aware	5	
		No response	6	
12	Do you know that, in this institution/company, there is an Integrity Committee to which you can report any experiences of unethical behaviour or corruption?	Yes	1	
		No	2	
		No response	3	
13	If response to Q12 is Yes, how did come to know that there is an Integrity Committee in the institution/company?	Customer Service Centre	1	
		Posters in the building	2	
		Radio/TV	3	
		Newspaper	4	
		Institution/Company website	5	
		Institution/Company Facebook page	6	
		Other (enter below)	7	
14	What is your experience of the operation of the institution/company in terms of service delivery?	Extremely satisfied	1	
		Very satisfied	2	
		Unsure/ Cannot say	3	
		Slightly satisfied	4	
		Not at all satisfied	5	
		No response		
15	Does the institution/company have a Service Delivery Charter? [A Service Charter is a public document that sets out basic information on the services provided by an organisation, the standards of service that the public or customers can expect from an institution, including feedback and grievance mechanisms]	Yes	1	
		No	2	
		No response	3	
16	If response to Q15 is Yes, which of the following information does the Charter communicate to clients?	Procedures for acquiring the service	1	Multiple responses allowed
		The cost of the service	2	
		Duration within which the service will be provided	3	
		Service assistance and feedback channels	4	
		Service complaints and grievances procedures	5	
17	Do you frequently seek a public service from this institution/ company?	Very frequently	1	
		Frequently	2	

		Occasionally	3	
		Rarely	4	
		Very rarely	5	
		No response	6	
18	If response to Q17 is Very frequently , Frequently and Occasionally , to what extent would you say service provision in the institution/ company has improved over the year(s)?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
19	If the institution/ company has a Customer Service Centre and you used it, to what extent would you say it was helpful?	To a very large extent	1	[THIS QUESTION SHOULD ONLY BE ASKED TO RESPONDENTS THAT INDICATED "CUSTOMER SERVICE CENTRE" IN QUESTION 12]
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	

Section 2. Impact of the IC programme

Impact is conceptualised as a measure of change in the environment as a consequence of achieving the purpose of project interventions. That is, what difference the interventions have made

			Coding	Instructions
20	To what extent do you think individuals can access a public service in this institution/ company without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours)?	To a very large extent	1	
		Large extent	2	
		Moderate	3	
		Small extent	4	
		Very small extent	5	
		No response	6	
21	Did you have a corruption (bribery) or malpractices (unethical, illegal, or negligent professional behaviours) experience in this institution/ company?	Yes	1	
		No	2	
		No response	3	
22	If response to Q21 is Yes , did you report the incident?	Yes	1	
		No	2	
		No response	3	
23	If response to Q22 is Yes , where did you report the incident?	An officer in the institution/ company	1	
		Customer Service Centre	2	
		Integrity Committee	3	
		Anti-Corruption Commission	4	
		Zambia Police	5	
		Other	6	
		No response	7	
24	If response to Q22 is No , why did you not report the incident?	Did not know where to report	1	
		Do not know how to report	2	

		Was not interested in reporting	3	
		Other	4	
		Other - INSERT RESPONSE		
25	Do you think women, the youth and persons with disabilities, benefit equally in accessing a public service in this institution?	Always	1	
		Often	2	
		Sometimes	3	
		Rarely	4	
		Do not know	5	
		No response	6	
26	If response to Q48 is Sometimes and Rarely, solicit more responses on why this is the case.			

End Time:

Many Thanks

Appendix V. Exit Polls - Districts, Target Institutions and Sample

District/ Institution	No. of Respondents
Chipata	40
Chipata City Council	20
Chipata General Hospital	20
Choma	40
Choma City Council	20
Choma General Hospital	20
Kabwe	40
Kabwe Municipal Council	20
Lukanga Water and Sanitation Company	20
Kasama	40
Chambeshi Water Supply and Sanitation Company	20
Kasama Municipal Council	20
Kitwe	40
Kitwe City Council	40
Livingstone	40
Livingstone City Council	20
Livingstone General Hospital	20
Luanshya	40
Luanshya Municipal Council	40
Lusaka	416
Citizen Economic Empowerment Commission (CEEC)	20
Higher Education Loans and Scholarships Board (HELSB)	20
Immigration Department	20
Judiciary	19
Local Authorities Superannuation Fund Superannuation (LASF)	20
Lusaka City Council	20
Ministry of Lands	18
National Health Insurance Management Authority (NHIMA)	20
National Institute of Public Administration (NIPA)	20
National Pension Scheme Authority (NAPSA)	20
National Registration, Passports and Citizenship - NRC	19
National Registration, Passports and Citizenship - Passports	20
Patent and Company Registration Agency (PACRA)	20
Public Service Pension Fund (PSPF)	20
Road Transport and Safety Agency (RTSA)	20
University Teaching Hospital (UTH) - Adult Hospital	20
UTH - Children's Hospital	20
UTH - Women and Unborn	20
Zambia Police Service (ZPS)	20
Zambia Revenue Authority (ZRA)	20
ZESCO Limited	20
Mansa	20
Mansa Municipal Council	20
Mazabuka	20

Mazabuka Municipal Council	20
Ndola	40
Ndola City Council	20
Zambia Forestry and Forest Industries Corporation (ZAFFICO)	20
Solwezi	40
Provincial Administration	20
Solwezi Municipal Council	20
Grand Total	816

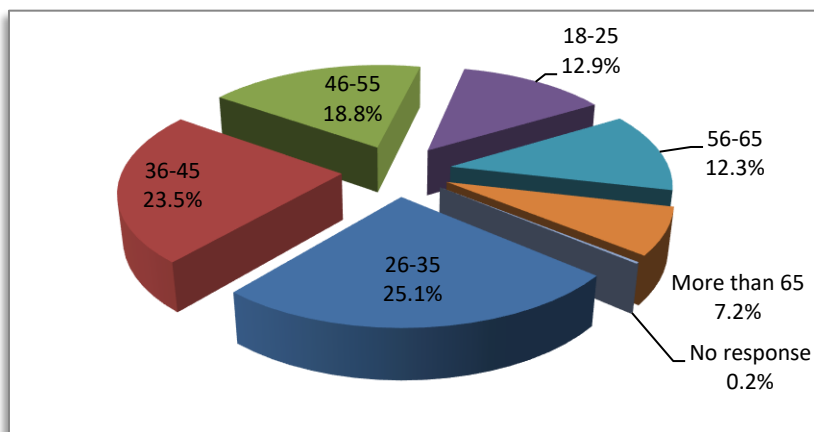
Appendix VI. Exit Polls - Respondent Demographic Characteristics

Total number of respondents is 816.

A. Gender (Sex of respondent)

Gender	No. of Respondents
Female	38.2%
Male	61.8%
Grand Total	100.0%

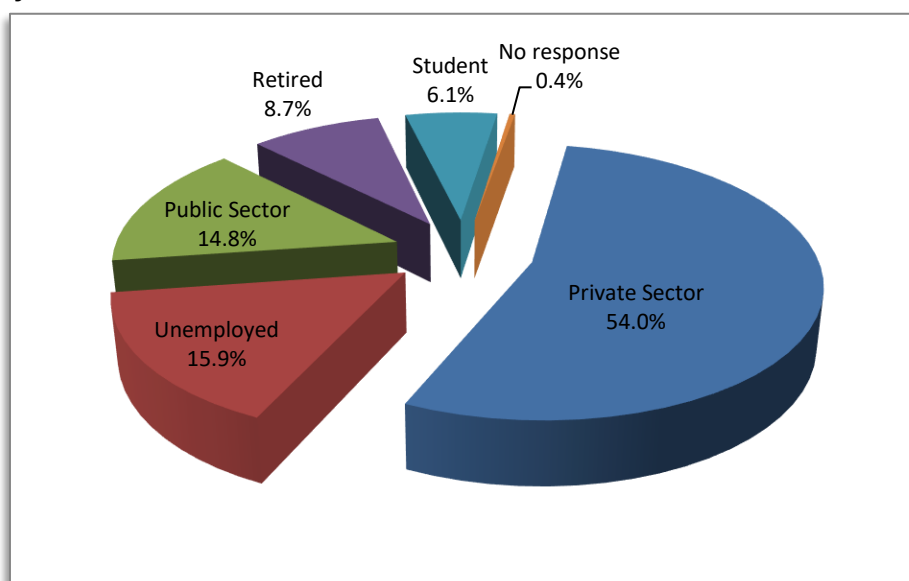
B. Age Cohort



C. Highest level of education attained

Level of Education	No. of Respondents	Relative
Not been to school	5	0.6%
Pre-school	1	0.1%
Primary (Grade 1 - 7)	76	9.3%
Basic (Grade 8 and 9)	96	11.8%
High school (Grade 10 – 12)	214	26.2%
Tertiary	418	51.2%
No response	6	0.7%
Grand Total	816	100.0%

D. Employment Sector



E. Disabilities

Disability	Relative
Yes	4.8%
No	95.2%
Grand Total	100.0%

Appendix VII. Verbatim on Lack of Equal Benefit in Accessing a Public Service

- (a) Because professionals have a bad attitude
- (b) Because they are known as second class citizens, such offices are not friendly with disabled people
- (c) Disabled people are always second priorities when it comes to such institutions
- (d) People look at you differently and the services are given differently and not as a human being. You are on your own and nobody is there to help. Treats you with impunity.
- (e) People with disabilities are marginalised
- (f) Sometimes disabled people are looked at to be beggars in some instances and treated differently as opposed to viewing them as someone seeking a service
- (g) The intimidation from the youths is too much. The place is not user friendly for the people with disabilities
- (h) They sometimes look down on the disabled as begging in the offices
- (i) Youths are less respected than older ones
- (j) Directions are not very clear to offices where to access relevant services
- (k) If you are dumb they find it difficult communicating with you hence sending you away causing the disabled not to frequently come here for services.
- (l) No proper details of how such individuals can access service
- (m) Sometimes I don't get that extra help that I may need moving from office to office and direction
- (n) too many procedures
- (o) Usually the deaf and dumb are not attended to, due to lack of sign language interpreter at the facility.
- (p) Access to services are more difficult for people with disabilities and may take longer
- (q) Because the facility doesn't have special features
- (r) Disabled people can't get into the building because there's no equipment installed for them
- (s) For the disabled it is not equal for instance this pavement is not for someone using a wheel chair
- (t) It's difficult for some disabled people to access the facility
- (u) No facilities specifically for the disabled as compared to the able people
- (v) No lifts for disabled, not working
- (w) No ramp and instead there are stairs and difficult for people with disabilities.
- (x) No wheelchair slide provision
- (y) People with disabilities are not able to access a service to the full since it does not cater for them in terms of elevators
- (z) People with disabilities do can't access the different departments in the building easily. No ramps or disability friendly facilities
- (aa) Physical barrier only stairs at entrance
- (bb) Some people are shunning the council because there are no lifts, they need to be working and functional
- (cc) There are no lifts or drive way for disabled people
- (dd) There are stairs all over and difficult for access to the building
- (ee) There is no Lift at Council for disabled people
- (ff) There is no Lift for disabled persons
- (gg) There is no provision for people on wheel chair to move around the building
- (hh) There is no wheelchair for disabled people through the main entrance
- (ii) They have limited access because of the building, it has no ramp
- (jj) They have to be manually assisted to due to lack of working lifts
- (kk) This institution does not have elevators for persons with disabilities to access certain services which are upstairs
- (ll) Stair cases are hindrance
- (mm) Depending on their disability or if they are aged, then it will be difficult to access the services
- (nn) Disabled should be given more chances
- (oo) Due to old age, it's difficult for them to sit for long hours.
- (pp) For the disabled its difficult because of congestion
- (qq) It depends on who is on duty on that day. Others would look to prioritize people with disability and others completely overlook them.

- (rr) It's not always easy to find same people who understand you and help you the same.
- (ss) No help for disabled persons
- (tt) The institution doesn't have a specific desk for disabled people
- (uu) There is no access for people on wheel chairs, queues are long.
- (vv) There are long queues which is not favourable for people with disabilities and old people
- (ww) There are long queues and difficult for people with disabilities
- (xx) There is no deliberate provision for people with disabilities to be served earlier
- (yy) There is no order even in the queue and there is no deliberate efforts to isolate and help people with different issues such as old age or disabilities
- (zz) There is no special place specifically for the people that are disadvantaged
- (aaa) There should be a separate place for old and those with disabilities
- (bbb) They may get help but not the same as those without disabilities or energetic

Appendix VIII. Service Delivery Charter Existence – Exit Polls Response

Respondent Knowledge of SDC	Absolute	Relative
Yes	10	32.3%
No	21	67.7%
Total	31	100.0%

Institution with SDC	Exit Polls Response
Chambeshi Water Supply and Sanitation Company	NO
Chipata City Council	NO
Chipata General Hospital	NO
Choma General Hospital	YES
Choma City Council	NO
Higher Education Loans and Scholarships Board (HELSB)	NO
Immigration Department	YES
Judiciary	NO
Kabwe Municipal Council	YES
Kasama Municipal Council	NO
Kitwe City Council	NO
Livingstone City Council	NO
Livingstone General Hospital	NO
Luanshya Municipal Council	NO
Lukanga Water and Sanitation Company	YES
Ministry of Lands	NO
National Health Insurance Management Authority (NHIMA)	NO
National Institute of Public Administration (NIPA)	YES
National Pension Scheme Authority (NAPSA)	YES
National Registration, Passports and Citizenship - NRC	NO
National Registration, Passports and Citizenship - Passports	YES
Patent and Company Registration Agency (PACRA)	YES
Public Service Pension Fund (PSPF)	NO
Road Transport and Safety Agency (RTSA)	YES
Solwezi Municipal Council	NO
UTH - Children's Hospital	NO
UTH - Women and Unborn	NO
Zambia Forestry and Forest Industries Corporation (ZAFFICO)	NO
Zambia Police Service	NO
Zambia Revenue Authority (ZRA)	NO
ZESCO Limited	YES
Count = 31	

Appendix IX Programme Evaluation Ratings Scale

A. Relevance, Coherence, Efficiency, Effectiveness and Impact

Likert Scale Responses	Evaluation Rating
A. Extent⁴⁴	
To a very large extent	Highly Satisfactory (HS)
Large extent	Satisfactory (S)
Moderate	Neither Satisfactory nor Unsatisfactory (NSU)
Small extent	Unsatisfactory (U)
Very small extent	Highly Unsatisfactory (HU)
B. Agreement	
Strongly agree	Highly Satisfactory (HS)
Agree	Satisfactory (S)
Neither agree nor disagree	Neither Satisfactory nor Unsatisfactory (NSU)
Disagree	Unsatisfactory (U)
Strongly disagree	Highly Unsatisfactory (HU)
C. Frequency	
Always	Highly Satisfactory (HS)
Often	Satisfactory (S)
Sometimes	Neither Satisfactory nor Unsatisfactory (NSU)
Rarely	Unsatisfactory (U)
Never	Highly Unsatisfactory (HU)
D. Awareness	
Extremely aware	Highly Satisfactory (HS)
Moderately aware	Satisfactory (S)
Somewhat aware	Neither Satisfactory nor Unsatisfactory (NSU)
Slightly aware	Unsatisfactory (U)
Not at all aware	Highly Unsatisfactory (HU)
D. Satisfaction	
Extremely satisfied	Highly Satisfactory (HS)
Very satisfied	Satisfactory (S)
Unsure/ Cannot say	Neither Satisfactory nor Unsatisfactory (NSU)
Slightly satisfied	Unsatisfactory (U)
Not at all satisfied	Highly Unsatisfactory (HU)

B. Sustainability

Likert Scale Responses	Evaluation Rating
Extent	
To a very large extent	Highly Likely (HL)
Large extent	Likely (L)
Moderate	Neither Likely nor Unlikely (NLU)
Small extent	Unlikely (UL)
Very small extent	Highly Unlikely (HUL)

⁴⁴ Extent measures the degree to which an aspect of the Programme is valid or applicable.

Appendix X. Integrity Committee Implementation Challenges

Challenge	Observations	Relative
IC being reconstituted	33	22.1%
Inadequate Programme advisory support & capacity building	26	17.4%
Budget constraints	17	11.4%
Unchanging corruption behaviours	10	6.7%
IC is ineffective	8	5.4%
Membership turnover	7	4.7%
Insufficient Programme monitoring	7	4.7%
Insufficient internal awareness of existence of IC & sensitisation	6	4.0%
Weak implementation of IC recommendations & adherence to Guidelines	6	4.0%
Insufficient reduction of interpersonal contact	5	3.4%
Programme is added responsibility/ad hoc	5	3.4%
Absence of staff monitoring mechanisms	5	3.4%
Structure is not suitable	5	3.4%
Other	4	2.7%
Programme objectives are not institution-specific	3	2.0%
Inadequate compatibility with other likely AC units	2	1.3%
Grand Total	149	100.0%

Annex 1. Scope of Works

The scope of works was as follows: -

- (a) Preparing an Inception Report outlining the Consultant's understanding of the assignment and its Terms of Reference, methodology (with detailed sampling frame and an evaluation matrix) and work plan/timeframes for conducting the evaluation.
- (b) Conducting a desk review on relevant literature to draw out critical issues which will inform the evaluation and continued roll-out (implementation) of the IC Programme. Some of the key documents to be reviewed include, but are not necessarily limited to the following - the National Anti-Corruption Policy (NACP) and its Implementation Plan; ACC Strategic Plan; Integrity Committee guidelines; Integrity Committee Handbook; Integrity Committee Anti-Corruption Prevention Annual Plans (ACPAPs); Integrity Committee Quarterly progress reports; Integrity Committee Chief Executive Forum report/s; and ACC Institutional Monitoring Reports.
- (c) Undertaking consultations with IC institutions Chief Executive Officer, staff, clients and IC members), Cabinet Office, ACC and other relevant stakeholders through meetings/discussions and interviews to explore issues relating to the operations of ICs in terms of successes and challenges.
- (d) Reviewing the Monitoring, Evaluation and Assessment (MEA) tool and developing an IC Programme Logical Framework with appropriate performance indicators.
- (e) Submitting a Draft Report on the findings, conclusions and recommendations, and incorporate resulting comments from stakeholders.
- (f) Submitting the Final report.
- (g) Presenting the Evaluation findings to Stakeholders.

Annex 2. Programme Evaluation Matrices

A. Relevance

Evaluation Criteria	Evaluation Question	Sub-questions	Indicator(s)	Data Collection Methods	Data Sources
Relevance of the Programme	How well is the Programme designed in order to meet its overall objective?	Are the objectives of the Programme consistent with the - (a) Eighth National Development Plan, anti-corruption policies (b) Anti-Corruption Act No. 3 of 2012 (c) Forfeiture of Proceeds of Crime Act No. 19 of 2010 (d) Public Interest Disclosure (Protection of Whistle blowers) Act No. 4 of 2010 (e) Public Finance Management Act No. 1 of 2018 (f) Public Procurement Act No. 8 of 2020	Alignment of Programme objectives with the Eighth National Development Plan, Anti-corruption legislative frameworks	Desk Reviews - Eighth National Development Plan, Anti-corruption legislative frameworks	Anti-Corruption Commission Programme Reports Laws of Zambia
		How suitable is the Programme design and implementation in mainstreaming corruption prevention in the routine business of the institutions?	Perceptions on the structure, and criteria for membership of ICs	Key Informant interviews (Semi-Structured) Desk Reviews	Integrity Committees in Evaluation Sample Institutions Programme Reports
		To what extent are the objectives of the Programme relevant to corruption prevention needs and priorities of the beneficiary institutions?	Perceptions on processes put in place regarding reporting unethical conduct/ corruption; accessing a public service	Key Informant interviews (Semi-Structured) Desk Reviews	Integrity Committees in Evaluation Sample Institutions Programme Reports
		Are the objectives of the Programme consistent with the priorities for Anti-corruption in the institution?	Availability of different systems/interventions aimed at fighting unethical conduct/corruption	Key Informant interviews (Semi-Structured) Desk Reviews	Anti-Corruption Commission Programme Reports
		Does the implementing institution view the Integrity Committee Programme interventions as useful and valuable?	Perceptions and attitude toward ICs by public officials	Key Informant interviews (Semi-Structured) Exit Polls	Integrity Committees in Evaluation Sample Institutions Public service seekers
		Do public service seekers view the Integrity Committee Programme interventions as useful and valuable?	Perceptions and attitude toward ICs by the public		
		To what extent are the activities and outputs of the ICs consistent with the overall goal and the attainment of its objectives?	Perceptions on the different systems in place aimed at fighting corruption	Key Informant interviews (Semi-Structured) Desk Reviews	Integrity Committees in Evaluation Sample Institutions Programme Reports

		Are the activities and outputs of the ICs consistent with the intended impacts and effects?	Percentage of those who were aware of where to report cases of unethical conduct/ corruption within the institution	Key Informant interviews (Semi-Structured) Desk Reviews	Integrity Committees in Evaluation Sample Institutions Programme Reports
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B. Coherence

Evaluation Criteria	Evaluation Question	Sub-questions	Indicator(s)	Data Collection Methods	Data Sources
Coherence of the Programme	Are the Integrity Committee Programme interventions aligned with other interventions implemented by the institution (internal coherence)?	Are the Integrity Committee Programme interventions compatible with other public service delivery interventions in the institution?	Performance targets and work plans at Department/ Section/ Unit and individual levels are aligned with the Institution's performance targets and goals	Desk Reviews Key Informant interviews (Semi-Structured)	Programme Reports Integrity Committees in Evaluation Sample Institutions
		Are there synergies (working together) and interlinkages between the Programme interventions and other public service delivery interventions carried out by the institution?	Partnerships with those who do not comply with agreements are reviewed regularly and, if possible/ necessary, the appropriate sanctions applied	Desk Reviews Key Informant interviews (Semi-Structured)	Programme Reports Integrity Committees in Evaluation Sample Institutions
		To what extent is there complementarity of IC interventions with other public service delivery interventions within the institution?	Existence of institutional activity/ annual plans that integrate control of corruption and malpractices	Desk Reviews Key Informant interviews (Semi-Structured)	Programme Reports Integrity Committees in Evaluation Sample Institutions
		To what extent is there harmonisation of IC interventions with other public service delivery interventions within the institution?			
		To what extent is there co-ordination of IC interventions with other public service delivery interventions within the institution?			
		To what extent does the Integrity Committee Programme in the institution have a peripheral (unimportant) perspective? That is, the IC does not have an institution-centric perspective.	Recognition is given to partners who consistently contribute to the enhancement of the Institutions integrity development efforts	Key Informant interviews (Semi-Structured)	Integrity Committees in Evaluation Sample Institutions
		To what extent do the Integrity Committee Programme interventions add value to the institution's work process, while avoiding duplication of effort?	Perceptions on non-existence of conflicts between IC interventions and other institution's work processes	Key Informant interviews (Semi-Structured) Desk Review	Integrity Committees in Evaluation Sample Institutions Programme Reports Annual Reports

		Are the objectives of the IC Programme seamless (corresponding in size, degree or extent and having no due demands) with the institutional capacity conditions?	There are regular discussions (during staff meetings, one on ones, etc.) between supervisor and subordinate on the corruption vulnerabilities of office systems and processes and how they can be addressed	Key Informant interviews (Semi-Structured) Desk Review	Integrity Committees in Evaluation Sample Institutions Programme Reports Annual Reports
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C. Efficiency

Evaluation Criteria	Evaluation Question	Sub-questions	Indicator(s)	Data Collection Methods	Data Sources
Efficiency of the Programme	To what extent do the Programme interventions deliver, or likely deliver, intended results in a cost-effective manner?	Are the funds allocated to the Integrity Committee used for the intended interventions/purpose?	Management audits are done to monitor performance and the utilisation of resources.	Desk Reviews Key Informant interviews (Semi-Structured)	Financial and Human Resource Reports ACC IC Monitoring Reports Integrity Committees in Evaluation Sample Institutions
		To what extent where the cost of the Integrity Committee Programme services or activities reasonable in relation to the benefits?	The costs of services or activities do not exceed the budgeted amounts	Key Informant interviews (Semi-Structured)	Integrity Committees in Evaluation Sample Institutions
		Do you agree that the introduction of the Programme is the most cost-effective way of fighting corruption in public and private institutions compared to other alternatives?	Percept positive feedback from institutions	Key Informant interviews (Semi-Structured)	Integrity Committees in Evaluation Sample Institutions

D. Effectiveness

Evaluation Criteria	Evaluation Question	Sub-questions	Indicator(s)	Data Collection Methods	Data Sources
Effectiveness of the Programme	To what extent did the Integrity Committee Programme interventions produce the desired results?	Did the Integrity Committee develop and implement the Annual Corruption Prevention Action Plan (ACPAP)?	Programme activities which were done differently to ensure effectiveness	Desk Reviews	ACC Desk Officers Program Reports ACC IC Monitoring Reports
		Did the Integrity Committee submit quarterly progress reports?			
		What interventions did the Integrity Committee introduce to reduce corruption and malpractices in the institutions?	Number of interventions by the IC on the reduction of corruption in their respective institutions, and perceptions/ experiences thereof	Desk Reviews Key Informant interviews (Semi-Structured) Exit Polls	Program Reports ACC IC Monitoring Reports Integrity Committees in Evaluation Sample Institutions Public service seekers
		What mechanisms has the Integrity Committee developed for receiving and providing redress on all complaints emanating from within and outside the organisation relating to ethical issues and hindrances to efficient and effective service delivery?	Mechanisms developed by ICs for receiving and providing redress on all complaints, and perceptions/experiences thereof Ethical issues addressed by the IC.	Desk Reviews Key Informant interviews (Semi-Structured) Exit Polls	Programme Reports ACC IC Monitoring Reports Integrity Committees in Evaluation Sample Institutions Public service seekers
		Where there are aspects of the Programme that could have been done differently (process effectiveness)?	Programme activities which were done differently to ensure effectiveness	Desk Reviews Key Informant interviews (Semi-Structured)	Program Reports ACC IC Monitoring Reports Integrity Committees in Evaluation Sample Institutions

E. Impact

Evaluation Criteria	Evaluation Question	Sub-questions	Indicator(s)	Data Collection Methods	Data Sources
Impact of the Programme	What difference has the Integrity Committee interventions made on corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours) experiences in the institution?	To what extent can public service seekers access a public service in the institution without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours)?	Perceptions on overall customer satisfaction in terms of service delivery Perceptions on the levels of corruption and malpractices Perceptions on IC's effort in the fight against corruption and malpractices	Desk Reviews Key Informant interviews (Semi-Structured) Exit Polls	Program Reports ACC IC Monitoring Reports Integrity Committees in Evaluation Sample Institutions Public service seekers
		To what extent can members of staff provide a public service in the institution without being vulnerable to corruption (bribery) and malpractices (unethical, illegal, or negligent professional behaviours)?			
		To what extent have IC programme interventions resulted in a change in public service seekers attitudes towards reporting bribery experiences and unethical behaviours?			

		To what extent have IC programme interventions resulted in a change in members of staff attitudes towards reporting bribery experiences and unethical behaviours?			
		Do the marginalised and vulnerable, benefit equally in accessing a public service in the institution?	Perceptions of women, the youth and persons with disabilities who are able to access a public service in the institution without being vulnerable to corruption (bribery) and malpractices		

F. Sustainability

Evaluation Criteria	Evaluation Question	Sub-questions	Indicator(s)	Data Collection Methods	Data Sources
Sustainability of the Programme	Will the Integrity Committee Programme benefits likely continue into the foreseeable future?	To what extent will the benefits of the Programme likely continue?	An Annual Corruption Prevention Action Plan (ACPAP) is in place and is being implemented The structure and systems of the IC are in place Capacity of IC	Desk Reviews Key Informant interviews (Semi-Structured)	Program Reports (including financial reports) ACC IC Monitoring Reports Integrity Committees in Evaluation Sample Institutions
		To what extent has the Programme design and implementation grounded a framework or mechanisms that can likely result in a continuous impetus towards mainstreaming the prevention of corruption and related malpractices in public and private institutions?	Programme design mainstreamed in the prevention of corruption and related malpractices in public and private institutions	Desk Reviews Key Informant interviews (Semi-Structured)	Program Reports (including financial reports) ACC IC Monitoring Reports Integrity Committees in Evaluation Sample Institutions
		To what extent have Integrity Committee Program implementing institutions gained the ability to independently continue implementing the Programme?	Specific and adequate funding is allocated to Integrity Committees IC capacity building initiatives	Desk Reviews Key Informant interviews (Semi-Structured)	Program Reports (including financial reports) ACC IC Monitoring Reports Integrity Committees in Evaluation Sample Institutions

Annex 3. Implementation of 2015 ICPE Recommendations**A. Implementation**

No.	Recommendation	Accepted		Rejected**
		Implemented	Not implemented*	

A	IC structure should not be pre-set but rather respond to the different institutional needs.	8 (CEEC; LiCC; MoL; NIPA; PSPF; RTSA; ZPS; ZRA)	1 (NRFA)	
B	Membership should include IC officers from other institutions to enhance transparency in the operations of the IC programme.		4 (CEEC; NIPA; NRFA; PSPF)	5 (LiCC; MoL; RTSA; ZPS; ZRA)
C	Create a permanent position with clear job description for an officer to manage the day to day administration work of the IC.	4 (MoL; RTSA; ZPS; ZRA)	5 (CEEC; LiCC; NIPA; NRFA; PSPF)	
D	Job descriptions of officials that qualify to be appointed as IC members should include the work of the IC programme.	5 (LiCC; MoL; RTSA; ZPS; ZRA)	4 (CEEC; NIPA; NRFA; PSPF)	
E	Increase funding and the timely release of such funds for ICs to be implemented and operate effectively, as a number of institutions have budget constraints as a result of insufficient budgetary allocations towards IC related activities.	7 (CEEC; LiCC; MoL; PSPF; RTSA; ZPS; ZRA)	2 (NIPA; NRFA)	

***Not implemented reasons**

It is not possible to have people from out of the institution

It is not possible. The police have their own way of working different from others

It will not work. It would not be practical

It would just complicate issues

**** Rejected reasons**

It is not possible to have people from out of the institution

It is not possible. The police have their own way of working different from others

It will not work. It would not be practical

It would just complicate issues

B. Relevance

No.	Recommendation	Accepted	
		Implemented	Not implemented*
A	Ensure that the process of reporting corruption is adequately publicised.	8 (CEEC; LiCC; MoL; NRFA; PSPF; RTSA; ZPS; ZRA)	1 (NIPA)
B	Increase awareness levels among both the public officials and general public on where to report cases of unethical conduct/corruption.	7 (LiCC; MoL; NRFA; PSPF; RTSA; ZPS; ZRA)	2 (CEEC; NIPA)

***Not implemented reasons**

Budget constraints

Work-in-progress

C. Effectiveness

No.	Recommendation	Accepted	
		Implemented	Not implemented*
A	Reengineer some of the administration aspect which include, the provision of clear service information, quicken the process of attending to inquiries or issuance of the services.	7 (LiCC; MoL; NRFA; PSPF; RTSA; ZPS; ZRA)	2 (CEEC; NIPA)
B	Display visual information on how to report corruption in the customer waiting rooms and service points.	6 (LiCC; MoL; NRFA; RTSA; ZPS; ZRA)	3 (CEEC; NIPA; PSPF)
C	Educate both the general public and public official on the dangers and importance of reporting unethical conduct/corruption.	6 (LiCC; MoL; NRFA; RTSA; ZPS; ZRA)	3 (CEEC; NIPA; PSPF)

***Not implemented reasons**

Budget constraints

Lack of funding

Work in progress

D. Impact

No.	Recommendation	Accepted	
		Implemented	Not implemented*
A	Introduce electronic systems in servicing the general public in order to limit physical interactions between service seekers and service providers as a means of reducing opportunities for corruption and increasing customer satisfaction.	6 (LiCC; MoL; NRFA; RTSA; ZPS; ZRA)	3 (CEEC; NIPA; PSPF)
B	Coordinate and synergize the efforts of all stakeholders including the communities, state institutions, civil society, international organizations and most importantly the donor community.	8 (CEEC; LiCC; MoL; NRFA; PSPF; RTSA; ZPS; ZRA)	1 (NIPA)

***Not implemented reasons**

Budget constraints

Work in progress

E. Sustainability

No.	Recommendation	Accepted	
		Implemented	Not implemented*
A	Institutions to take ownership on the implementation of ICs by institutionalising the IC programme through the creation of an office/position to manage the day to day administration of the IC activities	6 (LiCC; MoL; NRFA; PSPF; ZPS; ZRA)	3 (CEEC; NIPA; RTSA)
B	Promote external partnerships to create strong and stable institutional linkages.	7 (CEEC; LiCC; MoL; NRFA; PSPF; ZPS; ZRA)	2 (NIPA; RTSA)
C	Continuous training of the ICs members and public official through capacity building to create a pool of trainers to help in the training of new staff.	7 (CEEC; MoL; NIPA; NRFA; PSPF; ZPS; ZRA)	2 (LiCC; RTSA)

***Not implemented reasons**

Budget constraints

Lack of adequate resources

No funding

No funding and time

Annex 4. Monitoring, Evaluation and Assessment (MEA) Tool

INTEGRITY DEVELOPMENT CHECKLIST

Table 1.0 Standards for Prevention

Dimension	Indicator		Score (0-4)
A Leadership	1	A public statement against corruption is visibly displayed	
	2	Management submits the Annual Corruption Prevention Action Plan (ACPAP) as prescribed in IC Guidelines	
	3	ACPAP is implemented and activities monitored	
	4	Management implemented the MEA	
	5	Management submits Quarterly Progress Reports (QPR) as prescribed	
	6	IC Focal Point Persons are appointed in Provinces, Districts and Divisions	
	7	A full-time IC Secretariat is in place	
B Best Practice Interventions	8	A Code of Ethics is in place	
	9	An Institutional Gifts and Benefits Policy is in place	
	10	A Policy on Conflict of Interest is in place	
	11	An institutional Whistleblower Policy/guidelines is in place	
	12	An Asset Declaration procedure for all staff is in place	
	13	Best practice documents are reviewed periodically	
	14	A mechanism for monitoring file movement is in place	
C Human Resource Management	15	Recruitment Guidelines are in place	
	16	Ethical behaviour and maintenance of ethical standards is a required attribute for all candidates in the recruitment process	
	17	All positions have corresponding job descriptions and qualification standards	
	18	Hiring, placement and promotions are conducted in compliance with the institution's policies and procedures, as a means of ensuring transparency	
	19	A Post Employment Policy is in place	
	20	All records of hiring, placements and promotions are documented and filed	
	21	HR Policies are periodically reviewed	
	22	Staff performance assessment takes ethical standards and legal requirements into account	
	23	A Policy and /or guideline for secondary employment are in place	
D Procurement Management	24	An Annual Procurement Plan is in place	
	25	A database of suppliers of frequently procured items is in place	
	26	Third party observers (e.g. ACC) are present to witness evaluation of bids	
	27	Regular feedback to elicit improvements to the process is given by the third-party observers	
	28	Solicitation documents require potential suppliers/contractors not to engage in any form of malpractice	
	29	All Tenders and bidding documents inform potential suppliers/contractors that gifts and benefits should not be offered to employees	
E Financial Management	30	Budgeting, accounting and cash handling practices are based on Accounting standards/financial regulations	
	31	Financial reports containing actual expenditures versus budget are produced annually	
	32	All financial transactions are audited as prescribed in Public Finance laws	

	33	Computerized financial management systems have security access limited only to necessary personnel	
	34	Financial control systems are annually reviewed to ensure effectiveness against fraud and corruption	
F Complaints Handling System and Customer Interface	35	A Customer Service Charter is in place	
	36	A Customer feedback mechanism is in place	
G Collaborative partnerships	37	Collaborations on integrity development are established with other institutions	
Total number of Standards for Prevention			37
Total Score Possible			148
Total Score			0
Percentage Accomplishment			0

Table 2.0 Standards for Education

Dimension	Indicator		Score (0-4)
A. Leadership	1	All managers participate in Leadership Development Programmes that incorporates ethical leadership and organizational effectiveness	
	2	All staff in supervisory positions participate in Leadership Development Programmes	
	3	All staff have been sensitised on corruption and its negative effects on individuals and the society	
	4	All IC members have undergone IC Induction training	
	5	All Focal Point Persons have undergone IC Induction Training	
	6	All members of the IC Secretariat have undergone IC Induction training	
B. Best Practice Interventions	7	All staff have been sensitised on the provisions of the Code of Ethics	
	8	All staff have been sensitised on the provisions of the Gifts Policy	
	9	External stakeholders have been sensitised on the provisions of the gift policy	
	10	All staff are sensitised on the provisions of the Conflict of Interest Policy.	
	11	All Staff are sensitised on the provisions of the Whistleblower Policy	
	12	All members of staff have been sensitised on the need to declare personal assets and liabilities	
	13	Public awareness campaigns on internal measures to prevent corruption and related malpractices are held	
	14	Posters, brochures and other anti-corruption communications materials are available to the public with the institution	
C. Human Resource Management	15	All members of staff undergo induction training which includes topics on corruption prevention	
	16	All members of staff are sensitised on all HR policies	
	17	All relevant Policies are given to members of staff	
D. Procurement Management	18	All Members of Procurement Committees and other relevant personnel are oriented on procurement laws/regulations, the different methods and processes of procurement	
E. Financial Management	19	All Finance and Internal Audit staff are sensitised on corruption and fraud detection.	
F. Complaints Handling System and Customer Interface	20	All staff are sensitised on the complaints handling system	
	21	All relevant personnel undergo training on the handling of customer complaints	
	22	All relevant personnel undergo training on customer interface	
	23	Service Charter is visibly displayed in public areas.	

G. Collaborative partnerships	24	Joint sensitisations for internal and external stakeholders conducted	
Total Number of Standards for Education			24
Total Score Possible			96
Total Score			0
Percentage Accomplishment			0

Table 3.0 Standards for Enforcement

Dimension	Indicator		Score (0-4)
A Leadership	1	Top and senior management enforce integrity development measures	
	2	Decisions/actions of staff are randomly checked by an internal system for possible unethical conduct such as abuse of authority/discretion, conflict of interest	
B Best Practice Interventions	3	Members of staff violating the Code of Ethics are reported	
	4	Members of staff violating the Code of Ethics are sanctioned and the action documented.	
	5	Gifts and benefits are recorded in the Gifts Register	
	6	Conflict of Interest guidelines are enforced across all functions in the institution	
	7	The whistleblowers policy is enforced	
C Human Resource Management	8	8. All HR Policies relevant to integrity development are implemented	
	9	9. Best performing employees rewarded	
	10	Secondary Employment Policy and/or guidelines are enforced	
D Procurement Management	11	There is monitoring of the performance of suppliers and contractors against obligations	
E Financial Management	12	Audits are conducted to monitor performance and the utilisation of resources	
	13	Audit findings are immediately acted on and any queries resolved by management	
	14	Budgeting and accounting policies and guidelines are strictly enforced	
	15	All complaints are considered, evidence collected and investigated internally and where appropriate passed to relevant Agencies	
F Complaints Handling System and Customer Interface	16	The IC keeps a record on all actions taken on complaints.	
	17	Service standards are regularly monitored by management	
	18	Complaints and feedback from clients are analysed to identify possible incidences of corruption and other malpractices	
	19	The IC reviews and analyses reports and statistics on incidences of corruption to identify patterns, which could indicate weaknesses in systems	
G Collaborative partnerships	20	Recognition is given to partners who consistently contribute to the enhancement of the Institutions integrity development efforts	
Total number of Standards for Prevention			20
Total Score Possible			80
Total Score			0
Percentage Accomplishment			0

Table 4 Overall Assessment

Standard	% Accomplishment	LEAST VULNERABLE
Prevention	0	90-100
Education	0	80-89
Enforcement	0	70-79
Overall rating	0	60-69
		50-59
		40-49
		30-39
		20-29
		10-19
		0-9
		HIGHLY VULNERABLE

Annex 5. Logical Framework – IC Support and Strengthening

Intervention Logic	Objectively Verifiable Indicators	Means of Verification	Activities	Assumptions
Prevention				
A. Leadership	i) An Annual Corruption Prevention Action Plan (ACPAP). ii) # of activities fully implemented	i) The ACPAP Management minutes ii) Monthly and annual reports	i) Formulation of the ACPAP. ii) Implementation of ACPAP activities,	i) Trained IC, Budget line
	i) Formal policy of zero tolerance against corruption, ii) # of members of the public who know of the policy.	i) The policy of zero tolerance against corruption, ii) Evaluation Report	i) Formulation of Formal policy of zero tolerance against corruption, ii) Sensitization of members of the public about the policy.	i) CEO/Management commitment ii) Budget line
	i) # of Managers promoting an ethical workplace,	i) Management minutes, ii) Job advertisements, iii) HR Manual	i) Ethical leadership and maintaining ethical standards is included in the recruitment procedures of senior managers and officials.	i) CEO/Management commitment.
	i) An established system for Monitoring & Evaluating ACPAP,	i) Monitoring & Evaluating ACPAP system. ii) Activity reports iii) Assessment reports	i) Formulation of a system for Monitoring & Evaluating ACPAP,	i) Effective collaboration and coordination between ACC and IC institutions ii) ACC Desk Officer support iii) IC institution Management commitment iv) IC commitment
B. Code of Conduct	i) # of personnel with a copy of the Code of Ethics & the Institution's Code of Conduct for the Public Service	i) Management reports, ii) An in-house Code of Conduct and Code of Ethics.	i) Formulation of the Code of Ethics & the Institution's Code of Conduct for the Public Service, ii) Distribution of the Code of Ethics & the Institution's Code of Conduct for the Public Service among staff.	i) Institutional capacity ii) IC commitment iii) Budget line
	i) An effective Code of Conduct in preventing corruption	i) The Code of Conduct, which is reviewed every 24 months.	i) The Code of Conduct is reviewed after every 24 months for effectiveness in preventing corruption, ii) Results of M&E are used to enhance the Institution's own Code of Conduct.	i) IC commitment ii) Budget line iii) Institution mainstream M&E results in organisational processes,
C. Values	i) Identified value statements consistent with public duty principles/values are included in the institution's own Code of Conduct.	i) The institutions own Code of Conduct with identified value statements consistent with public duty principles/values.	i) Formulation of the Code of Conduct with identified value statements consistent with public duty principles/values.	i) Institutional capacity ii) IC institution Management commitment
	i) HRD promotes the values to create an organizational	i) The ACPAP Management minutes ii)	i) Organisational values are	i) IC institution Management commitment,

	culture that expressly upholds these values.	iii) Monthly and annual reports	discussed in meetings, Organisational values are displayed at strategic points in the organisation.	ii) Budget line,
	i) ACPAP ensures that all activities, programs, systems, policies, procedures and work practices are consistent with the identified values.	i) An ACPAP that ensures that all activities, programs, systems, policies, procedures and work practices are consistent with these values.	i) Conducting planning, monitoring and coordination meetings.	i) Budget line, ii) IC institution Management commitment iii) IC commitment
D. Gifts and Benefits	i) An Institutional Gifts and Benefits Policy	i) An Institutional Gifts and Benefits Policy	i) Formulation of the Institutional Gifts and Benefits Policy, ii) Institutional Gifts and Benefits Policy	i) Capacity of institution, ii) IC commitment iii) Budget line
	i) # of Departments/Sections/Units with a Gift Register for recording gifts and donations	i) Departments/Sections/Units Gift Registers.	i) Departments/Sections/Units formulate a Gift Register for recording gifts and donations	i) Capacity of Departments/Sections/Units,
E. Human Resource Management, Recruitment, Selection and Movement of Personnel	i) Institution recruitment, selection and hiring processes are consistent with national/institutional guidelines	i) HR Manual, ii) Job advertisements, iii) Job descriptions, iv) Job contracts	i) Review of the HR to ensure recruitment, selection and hiring processes are consistent with national/institutional guidelines.	i) IC institution Management commitment,
	i) A Post Employment Policy is in place	i) A Post Employment Policy for resigning/retiring personnel.	i) Formulation of a Post-Employment Policy	i) IC institution Management commitment,
F. Performance Management	Performance targets and work plans at Department/Section/Unit and individual levels are aligned with the Institution's performance targets and goals	i) Documents on the performance targets and work plans at Department/Section/Unit and individual levels.	i) Formulation of documents on the performance targets and work plans at Department/Section/Unit and individual levels.	ii) Capacity of Departments/Sections/Units, iii) IC institution Management commitment,
	i) A Policy and /or guideline for secondary employment are in effect	A Policy Document and /or guideline.	i) Formulation of a Policy and /or guidelines for secondary employment are in effect	i) IC institution Management commitment, ii) Capacity of institution, iii) Budget line,
	i) # of Managerial Accountability Workshops (MAWS) conducted	i) Workshops (MAWS) reports, ii) Management reports	i) MAWS are conducted, ii) Results of the MAWS are used to identify action steps for integrity development,	i) Budget line, ii) IC institution Management commitment
	i) Corruption prevention is integrated with management functions, policies, systems, procedures and plans	Policies, systems, procedures and plans with corruption prevention integrated with management functions,	i) Review of policies, systems, procedures and plans on corruption prevention.	i) IC institution Management commitment, ii) Budget line,
G. Procurement Management, Planning, Bidding, Selection and	i) An Annual Procurement Plan on which procurements for the year are based is in place	i) An Annual Procurement Plan	i) Formulation of an Annual Procurement Plan,	i) IC institution Management commitment,

Delivery of Services, Inspection and Conflict of Interest			ii) Use of the Annual Procurement Plan by the Procurement Committee.	ii) Institutional capacity
Education				
A. Leadership	i) # of senior managers who participate in a Leadership Program ii) # of managers acting in accordance with high ethical standards.	i) Management reports	i) The Leadership Program that incorporates ethical leadership, ethical decision-making, the importance of identifying,	i) IC institution Management commitment,
	i) # of staff who receive information on ethical leadership, ethical decision-making and the importance of maintaining high ethical standards.	ii) The ACPAP iii) Management minutes iv) Monthly and annual reports	i) Training of staff in; • Ethical leadership, • Ethical decision-making, • The importance of maintaining high ethical standards.	i) Budget line,
B. Code of Conduct	i) # of staff sensitized on the contents of the Code of Ethics for the Public Service and in-house Code of Conduct.	i) A document of the sensitization programs the contents of the Code of Ethics for the Public Service and in-house Code of Conduct.	i) Sensitization meetings for staff,	i) Budget line, ii) Staff commitment,
C. Values	i) # of personnel have undergone training in values, ethics and spiritual formation.	i) Activity reports. ii) Management meetings	i) Training of personnel in values, ethics and spiritual formation.	i) Budget line,
	i) The institutions values are promoted to clients, contractors and suppliers.	i) Activity reports. ii) Management meetings	i) Sensitization meetings for clients, contractors and suppliers.	i) Budget line, ii) Availability of clients, contractors and suppliers,
D. Gifts and Benefits	i) The policy on solicitation and acceptance of gifts is promoted.	i) The policy on solicitation and acceptance of gifts	i) Conducting information and education activities that promote the policy on solicitation and acceptance of gifts for external stakeholders ii) Production of communication materials which are consistent with the policy, iii) Ensure of staff in the Institution share the same understanding of the Gifts Policy.	i) Budget line, ii) Staff commitment,
E. Human Resource Management, Recruitment, Selection and Movement of Personnel	i) # of personnel have knowledge of their functions and positions and on what they are expected to deliver.	i) Management reports	i) Ensure that all personnel are informed of all HR policies and are aware of the systems, procedures and processes that affect their	i) IC institution Management commitment,

			employment, retention, promotion and transition, ii) New HR policies and guidelines are disseminated and explained to all staff within two weeks of their issuance.	
F. Performance Management	i) Performance appraisals are regularly done, with the results discussed by supervisor with the subordinate and subsequent performance expectations clarified	i) A performance Appraisal system in place.	i) Performance appraisals conducted for each staff member.	i) Staff commitment,
	i) # of relevant personnel are trained on corruption risk assessment and corruption prevention planning	i) Training reports	i) Conducting trainings on corruption risk assessment and corruption prevention planning for all relevant staff.	i) Budget line, ii) Staff capacity,
	i) Corruption risk areas are communicated to employees for their information and management	i) Management reports/minutes	i) Holding meeting to communicate the corruption risk areas to employees for their information and management	i) IC institution Management commitment, ii) Budget line,
G. Procurement Management: Planning, Bidding, Selection, Delivery and Inspection and Conflict of Interest	i) # of members of Procurement Committees and other relevant personnel trained on procurement laws/regulations, the different modes and processes of procurement	i) Procurement Committee minutes, ii) Training reports	i) Training of members of Procurement Committees and other relevant personnel.	i) Budget line,
	i) Suppliers are informed about the Integrity Pact, its value to the transaction and commit to abide by it.	i) The Integrity Pact, ii) Minutes of the meeting with Suppliers.	i) Holding of meetings Suppliers on the Integrity Pact,	i) Availability of clients, contractors and suppliers,
H. Financial Management: Budgeting, Accounting, Cash Handling	i) # of Internal Auditors sensitized on corruption vulnerabilities of the institutions financial management systems and processes	i) Sensitization Reports, ii) Management reports iii) Audit reports	i) Holding of sensitization meetings	i) Staff commitment,
	i) # of concerned personnel have a working knowledge of the Institutions 's financial management systems	i) Management reports ii) Activity reports	i) Holding of meetings with concerned staff on the Institutions 's financial management systems.	i) Staff commitment, ii) Budget line,
	i) # of staff who regularly receive information and other forms of awareness-raising about fraud and effective fraud management	i) Management reports ii) Activity reports	i) Production and regular distribution of information and other forms of awareness-raising about fraud and effective fraud management	i) Staff commitment
	i) # of staff who do not use office financial resources for personal purposes	i) Management reports	i) Conducting awareness-raising sessions.	i) Staff commitment,

Enforcement				
A. Performance Management	i) # of employees encouraged and recognised for their participation in MAWS and for identifying corruption risks and appropriate responses.	i) A system of rewards or their participation in MAWS and sanctioning staff poor and unethical performance.	i) Holding of sessions where staff of good and ethical performance are rewarded;	i) IC institution Management commitment, ii) Budget line,
B. Procurement Management: Planning, Bidding, Selection, Delivery and Inspection and Conflict of Interest	i) A system of monitoring of performance of suppliers and contractors against obligations.	i) A document on the system of monitoring of performance of suppliers and contractors.	i) Conducting monitoring of the performance of suppliers and contractors against obligations. ii) Suppliers not complying with contractual obligations are immediately sanctioned. iii) A list of any blacklisted suppliers is posted in the institutions website and this list shared with other MDAs, iv) All procurement decisions are audited and appropriate action taken on suspicious cases	i) IC institution Management commitment, ii) Budget line,
C. Financial Management: Budgeting, Accounting, Cash Handling	i) # of random audits carried out, with reports and recommendations for action acted on	i) Reports from the audit reports	i) All Financial reports are published and made available to the public for inspection.	i) IC institution Management commitment, ii) Budget line,
D. Reporting, complaints and Investigation	i) The IC has a system for fully and completely documenting all action on reports, even those forwarded to another unit for action	i) A system for fully and completely documenting all action on reports,	i) Holding of meeting to document all action on reports.	i) IC institution Management commitment, ii) Budget line,

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