

NAMIBIA



National Anti-Corruption Strategy and Action Plan

2021-2025

*'Nurturing synergy to promote an effective system of integrity,
transparency, ethics and accountability in all sectors of society in Namibia'*

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List of Abbreviations and Acronyms

ACC	Anti-Corruption Commission
ACPCN	Association of Charismatic and Pentecostal Churches of Namibia
ALAN	Association of Local Authorities Namibia
ARC	Association of Regional Councils
BoN	Bank of Namibia
BIPA	Business and Intellectual Property Authority
CEOs	Chief Executive Officers
CCN	Council of Churches in Namibia
CIVIC +264	Civil Society Information Centre Namibia
CIF	Construction Industries Federation of Namibia
CPI	Corruption Perception Index
CSOs	Civil Society Organizations
ECN	Electoral Commission of Namibia
EFN	Editors' Forum of Namibia
EITI	Extractive Industries Transparency Initiative
FAO	Food and Agriculture Organisation
FIC	Financial Intelligence Centre
HPP II	Harambee Prosperity Plan II
IAEA	International Atomic Energy Agency
IPPR	Institute for Public Policy Research
IUM	International University of Management
KPC	Kimberly Process Certificate
KPI	Key Performance Indicators
LAs	Local Authorities
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MFMR	Ministry of Fisheries and Marine Resources
MHETI	Ministry of Higher Education, Training and Innovation

List of Abbreviations and Acronyms

MICT	Ministry of Information and Communication Technology
MME	Ministry of Mines and Energy
MoEAC	Ministry of Education, Arts and Culture
MoDVA	Minister of Defence and Veterans Affairs
MoF	Ministry of Finance
MHAISS	Ministry of Home Affairs, Immigration, Safety and Security
MHSS	Ministry of Health and Social Services
MoJ	Ministry of Justice
MPE	Ministry of Public Enterprises
MPs	Members of Parliament
MSYNS	Ministry of Sport, Youth and National Service
MURD	Ministry of Urban and Rural Development
MWT	Ministry of Works and Transport
NaCC	Namibian Competition Commission
NACS	National Anti-Corruption Strategy and Action Plan 2016-2019
NACSAP	National Anti-Corruption Strategy and Action Plan 2021-2025
NACSC	National Anti-Corruption Steering Committee
NALAO	Namibian Association of Local Authority Officials
NAMFISA	Namibia Financial Institutions Supervisory Authority
NAMPOL	Namibian Police Force
NAMRA	Namibia Revenue Agency
NANTU	Namibia National Teachers' Union
NANSO	Namibia National Students Organisation
NAPWU	Namibia Public Workers Union
NATIS	National Traffic Information System
NCCI	Namibia Chamber of Commerce and Industry
NDP5	Namibia's Fifth National Development Plan
NEF	Namibia Employers' Federation
NGOs	Non-Governmental Organisations

List of Abbreviations and Acronyms

NID	Namibia Institute for Democracy
NIED	National Institute for Educational Development
NIPAM	Namibia Institute for Public Administration and Management
NIPDB	Namibian Investment Promotion and Development Board
NPC	National Planning Commission
NSC	Namibia Sports Commission
NTF	Namibia Trade Forum
NUNW	National Union of Namibian Workers
NUST	Namibia University of Science and Technology
NYC	National Youth Council of Namibia
OAG	Office of the Auditor-General
OMAs	Offices/Ministries/ Agencies
OoJ	Office of the Judiciary
OPM	Office of the Prime Minister
PG	Prosecutor-General
PAC	Public Accounts Committee
PEs	Public Enterprises
POCA	Prevention of Organised Crime Act
PPU	Public Procurement Unit
PSSR	Public Service Staff Rules
RCs	Regional Councils
SADC	Southern African Development Community
SDGs	Sustainable Development Goals
SME	Small and Medium Enterprises
TAW	Treasury Authorization Warrants
UN	United Nations
UNAM	University of Namibia
UNCAC	United Nations Convention Against Corruption
UNDP	United Nations Development Programme
UNPAF	United Nations Partnership Framework

Foreword

The implementation of anti-corruption policies to ensure effective governance within all institutions is an important priority for economic recovery and inclusive growth.

In line with this principle, Namibia signed a number of regional and international legal instruments against corruption and money laundering. These include the SADC Protocol against Corruption, African Union Convention on Preventing and Combating Corruption, United Nations Convention against Corruption, and the United Nations Convention against Transnational Organised Crime.



The above commitments mandate the Anti-Corruption Commission (ACC), as the coordinating institution of the National Anti-Corruption Strategy and all sectors, to ensure that the country develops mechanisms that translate to broader participation by citizenry. In August 2016, Cabinet approved the country's first National Anti-Corruption Strategy and Action Plan 2016-2019 (NACS), which ended in March 2020. Subsequently, Cabinet endorsed the commencement of a consultative process, by Decision No.3rd/01.03.21/012, for the development of the country's second National Anti-Corruption Strategy and Action Plan 2021-2025 (NACSAP) at a meeting on 09 March 2021.

The NACSAP is a cross-cutting national anti-corruption policy encompassing all sectors of Namibian society. The Strategy was developed after extensive consultations were held with stakeholders in all 14 regions. This Strategy, with commitments from all sectors, will certainly strengthen Namibia's continued efforts in building a governance system free from corruption.

Globally, corruption is among the challenges which may cause economic decline, high unemployment, and political mistrust if not effectively dealt with. Namibia should therefore make deliberate efforts to curb corruption. The Strategy is a tool to foster strong collaboration and serves as a platform for all stakeholders to contribute to the anti-corruption fight.

The Strategy integrates Namibia's development programmes as envisioned in Vision 2030, the National Development Plans (NDPs), and the Harambee Prosperity Plan II (HPP II). Namibia's citizens and esteemed development partners are, therefore, at the forefront of its development agenda.

Accountability, transparency and integrity are vital principles for national development. Strengthening platforms for all stakeholders to participate and make decisions at local, regional, and national levels of governance is critical in the fight against corruption.

The Strategy has eight (8) Strategic Objectives, informing 95 actions. If successfully executed, the Strategy will contribute to strengthening good governance in all sectors.

I call upon all stakeholders to maximise the implementation of the NACSAP and make Namibia a shining example in the fight against corruption.



Paulus Kalomho Noa

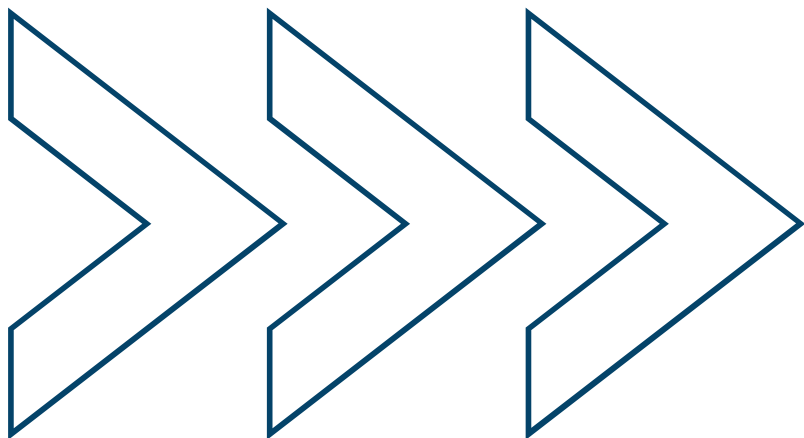
Director-General: Anti-Corruption Commission

Acknowledgment

The Government of the Republic of Namibia, through the Anti-Corruption Commission (ACC), the lead agency in the fight against corruption and coordinating body of the National Anti-Corruption Strategy, would like to extend appreciation to all stakeholders, namely: Offices/Ministries/Agencies (OMAs), Regional Councils (RCs), Local Authorities (LAs), private sector, Non-Governmental Organisations (NGOs), civil society and faith-based organisations, media, and individuals who participated and contributed to the crafting of the National Anti-Corruption Strategy and Action Plan 2021-2025 (NACSAP).

The contributions greatly enriched the development of the Strategy, which ensures representativeness, inclusivity of issues across all spheres of society, tackling of current challenges, and the promotion of the invaluable principles and values that translate into social progression for all Namibians. Special recognition also goes to the United Nations Development Programme (UNDP) for the continued support in the development and implementation of the national anti-corruption strategies since inception.

The NACSAP is a national document and belongs to all esteemed stakeholders who have duly contributed through nation-wide consultation and engagement with implementers and leaders.



Section 1: Strategic Context

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- 1.1 Introduction
 - 1.2 Structure of the document
 - 1.3 Background and Discussion
 - 1.3.1 Implementation and Evaluation of NACS 2016-2019
 - 1.3.2 Development of the NACSAP 2021-2025
 - 1.4 Legal Framework

1.1 Introduction

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

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

1.2 Structure of the document

Section 1: Strategic Context

The section focuses on the normative context of the corruption landscape in Namibia. These include the causes of corruption, legal framework, social and economic dynamics and country context.

Section 2: Strategic Objectives and Actions

This section is the heart of the document, setting out the umbrella of the Strategy framework namely, Strategy Vision, Mission, Strategic Objectives, Pillars and Actions.

Section 3: Structure and Implementation Plan

This section is dedicated to the Strategy implementation. These include the structure, monitoring bodies, Key Performance Indicators of the Action Plan, which is central to the accountability and execution of the actions contained therein.

1.3 Background and Discussion

1.3.1 Implementation and Evaluation of NACS 2016–2019

The Republic of Namibia implemented its novel National Anti-Corruption Strategy and Action Plan 2016–2019 (NACS) to promote integrity, accountability and transparency across all spheres of society. The Strategy, which was developed in line with the United Nations Convention against Corruption (UNCAC), was approved by Cabinet in August 2016, and implemented between 2017 and March 2020. The NACS had 75 actions implemented by 22 implementing institutions. Article five of UNCAC requires State Parties to develop and implement a comprehensive National Anti-Corruption Strategy. Namibia signed UNCAC on 9 December 2003 and ratified it on 3 August 2004.

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

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

The evaluation report provided several recommendations, such as implementing the proposed revision of the strategic objectives to ensure relevance and inclusion of emerging issues. Most of the actions of the NACS have also been recommended for inclusion in the NACSAP.

The majority of the first Strategy's actions have been included in the second Strategy as revised by implementing institutions. All the Ministries have one or more actions. This Strategy further includes other players and bodies from the private sector, sports and youth fraternities. Furthermore, it includes specific actions for RCs, LAs, the media, civil society, faith-based organisations and the youth.

Namibia is one of the countries scored by Transparency International's Corruption Perception Index (CPI). CPI scores countries on a scale of 0–100, with 0 indicating very high corruption and 100 indicating a very low level of corruption.

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

1.3.2 Development of the NACSAP 2021-2025

Despite robust efforts, corruption continues to plague Namibia. This NACSAP is therefore premised on synergy. It aims to bring all stakeholders together to promote effective governance by aligning the Strategy activities to their respective institution's Strategic Plans. Good governance is key to Namibia's economic growth and development, as indicated under the fourth pillar of NDP5. To achieve this, all sectors will be required to develop policies and programs that promote transparency and accountability, which aligns with achieving Outcome 4 of the UN Partnership Framework (UNPAF) 2019-2023.

The NACSAP outlines the activities and action plan to be implemented over five years (2021-2025) and ensure that the activities are embedded in implementing institutions Strategic Plans, and furthermore, enforces the National Anti-Corruption Strategy and Action Plan 2016-2019 evaluation report recommendations and contributes to the Sustainable Development Goals (SDG 16), target '16.5' as well as SDG 9: 'Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation' and SDG 17: 'Strengthen the means of implementation and revitalize the global partnership for sustainable development'.

The ACC will implement the Strategy as the Strategy Steering Committee's coordinating agency together with other implementing partners, policymakers, external stakeholders, development partners, and the broader public. Most of the actions of NACS have been retained in the NACSAP, as they are enshrined in the lead institutions' mandate, some were not fully implemented. The NACSAP revisited the strategic objectives to ensure that they respond to current and evolving national needs (integrity systems, good governance, and accountability) in the sectors initially enshrined in the Strategy and other sectors such as environment, agriculture, tourism and others deemed relevant in this Strategy.

The NACSAP was developed in consultation with stakeholders. Regional consultation meetings were held from 26 April to 22 July 2021 as well as a validation workshop and National Conference held on 19 August 2021 and 20 October 2021, respectively.

1.4 Legal Framework

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

A constitutional amendment in 2010 removed the power to investigate corruption from the functions of the Ombudsman and brought the ACC, which had been established in terms of section 2 of the Anti-Corruption Act, 2003, under the ambit of the Constitution. The ACC thus became a constitutionally enshrined institution in 2010.

The Anti-Corruption Act, 2003 (Act No. 8 of 2003) is a crucial piece of legislation dealing with preventing and combating of corruption in Namibia. Parliament passed the Act in 2003 following public consultations that had commenced in the mid-1990s. The Act entered into force in 2005, and the ACC was inaugurated on 1 February 2006. The Prevention of Corruption Ordinance, 1928 (Ordinance No. 2 of 1928), as amended by the Prevention of Corruption Amendment Act, 1985 (Act No. 21 of 1985), was the forerunner to the current Anti-Corruption Act of 2003.

The Anti-Corruption Act of 2003 defines “corrupt practice” as any conduct contemplated in Chapter 4 of the Act. Chapter 4 deals with the offences. In Chapter 4, the term “corruptly” is mostly used together with the term “gratification” when defining the offences. The definition of “corruptly” was struck down on constitutional grounds by *Lameck & Another v President of the Republic of Namibia & Others* 2012 (1) NR 255 (HC). The High Court held that the sections of the Act that use the term “corruptly” continue to be operational, with the term “corruptly” to be interpreted by the courts with regard to its dictionary definition, its definitions in international instruments and how it has been interpreted in previous case law. “Gratification” has been broadly defined and covers things like gifts loans, fees rewards, commissions, rights, privileges, influences, promises, etc. which may influence decision-making processes.

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

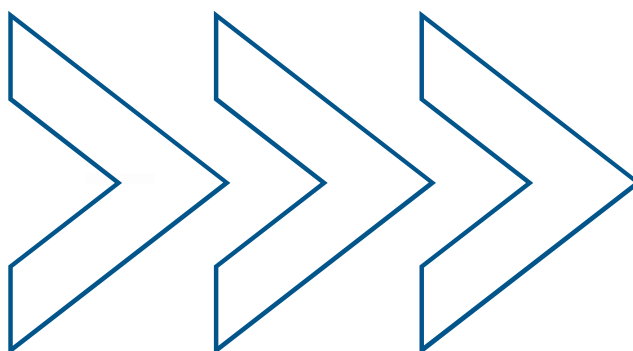
HPP II calls for the full implementation of the NACSAP. Additionally, NDP5's theme of 'Working Together Towards Prosperity' is among those pillars premised on good governance and seen as the bedrock of democracy and sustainable development. The NDP5 supports Vision 2030 and obligates the Government to continue its fights against corruption.

The NACSAP is interlinked with the United Nation's 2030 Agenda for Sustainable Development (2016), particularly envisaged to duly contribute to the fulfilment of (SDG 16), target 16.5, to 'substantially reduce corruption and bribery in all their forms'.



Priority SDG 16, target 16.5

Promote just, peaceful and inclusive societies



Key national documents linked to NACSAP

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



Linkage:

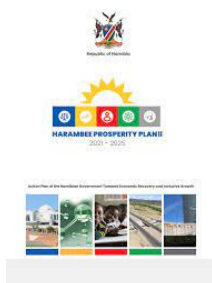
- Section 3.9 Enabling Environment
- Section 3.9.4 Good Governance, Transparency, Accountability
- Section 6.7 Democratic Governance

Activities:

- Independent watchdog institutions ensure the implementation of anti-corruption programmes and monitor activities of the Government, the private sector, and civil society organisations and agencies
- Create an enabling environment against social/political conflict and corruption and for democratic participation

Outcomes:

- The Government operates in an effective, efficient, transparent and accountable manner at all levels under accepted constitutional principles



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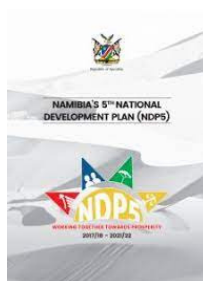
- Effective Governance and Service Delivery

Activities:

- Implementation of the Anti-Corruption Strategy and Action Plan; Access to Public Information; E-Governance

Outcomes:

- Full implementation of the NACSAP



Linkage:

- Section 5.2 Accountability and Transparency

Expected outcomes:

- Strengthen anti-corruption measures by educating public and private entities on measures to prevent and report corruption
- Institutions will devise Risk Management Plans that identify areas that are vulnerable to corruption and establish preventative measures

Outcomes:

- By 2022, Namibia is the most transparent and accountable nation in Africa.
- Reduced Corruption Perception Index from 65% (2015) to 35% (2020/21), 20% (2021/22)
- Increased Transparency International index (score) from 53 (2015) to 60 (2020/21), 65 (2021/22)

Namibia signed the United Nations Convention against Corruption (UNCAC) in 2003 and ratified the convention in 2004. The revision and development of the NACSAP is in line with Article 5 of the UNCAC, which requires State Parties to develop and implement a comprehensive national anti-corruption strategy. Namibia is also signatory to the African Union (AU) Convention on Preventing and Combating Corruption, the Southern African Development Community (SADC) Protocol against Corruption and the United Nations (UN) Convention against Transnational Organized Crime.

Other key legislation with anti-corruption motif are the following:

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

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

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

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

The Criminal Procedure Act, 1977 (Act No. 51 of 1977)

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

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

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

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

BoN has issued exchange control circulars to authorised dealers in foreign exchange (commercial banks) under the power vested in BoN under the Exchange Control Regulations, 1961.

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

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

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

The regulations promulgated under the Public Service Act, 1995 were amended during the 2015/2016 financial year to further regulate the conduct of staff members, in particular to prevent a conflict of interest between private interests and public duties to make the declaration of financial interests compulsory.

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

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

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

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

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

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

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

The Public Procurement Act, 2015 (Act No. 15 of 2015)

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

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

Regional Councils Act, 1992 (Act No. 22 of 1992) and Local Authorities Act , 1992 (Act No. 23 of 1992)

The Regional Councils Act, 1992 and Local Authorities Act, 1992 provide for the powers, duties, functions of the different structures and functionaries within the regional councils and local authorities. While the legislation has been instrumental in ensuring access to services at various levels of society, a lack of uniformity to broader public service was observed in implementation; hence, the robust call for harmonisation of the Public Service Act, the Regional Councils Act and Local Authorities Act to further foster decentralisation and promote accountability.

Section 2: Strategic Objectives and Actions

-
- 2.1 Strategy Framework
 - 2.1.1 Strategy Framework
 - 2.2 Strategic Objectives

2.1 Strategy Framework

The Strategy is premised on the social and economic climate of the country. Namibia's fight against corruption and its promotion of integrity and accountability focus on five strategic pillars: Prevention, Public Education, Law Enforcement, Deterrence, and Harmonisation.

The mechanisms provided for under the mentioned pillars are anticipated to promote integrity, transparency, accountability, ensure compliance, and foster synergy and effective governance across all sectors.

2.1.1 Vision and Mission of National Anti-Corruption Strategy

VISION

'A corruption-free Namibia'

MISSION

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

2.2 Strategic Objectives

The Strategy has eight (8) Strategic Objectives. The objectives include various sectors at the institutional and grassroots level(s) in private and public bodies. Accordingly, the strategic objectives respond to key issues and country challenges within this context. The strategic objectives were crafted through desk research and consultations with stakeholders, inclusive of public and private institutions, civil society, faith-based and youth organisations in all of the 14 regions.

The following strategic objectives inform the actions:

Strategic Objective 1	Increasing the level of political accountability and transparency
Strategic Objective 2	Preventing corruption in government offices, ministries and agencies, public enterprises, regional councils, local and traditional authorities
Strategic Objective 3	Strengthening efforts to deter corruption
Strategic Objective 4	Conducting extensive anti-corruption education
Strategic Objective 5	Enhance measures and increase accountability to prevent corruption in the private sector
Strategic Objective 6	Engaging civil society, non-governmental organisations, and the media in combating corruption
Strategic Objective 7	Preventing corruption and promoting accountability in the sports fraternity
Strategic Objective 8	Enhance engagement and participation of youth in anti-corruption programmes

Strategic Objective 1

Increasing the level of political accountability and transparency

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

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

To this effect, there is a need for continued enforcement by all relevant bodies, such as the ECN, the Ministry of Finance (MoF), and the National Assembly, as well as robust engagement, awareness and education on these provisions.

Specific Objective 1.1: Increasing the transparency of political party financing

Action 1.1.1 Annual reviews on whether provisions of party transparency as contained in Chapter 4 of the Electoral Act, 2014 have been complied with. Annual reports thereon will be published and submitted to Parliament. Each report will investigate any reasons for non-compliance and will offer solutions.

Responsibility: ECN, Parliament, MoF

Action 1.1.2 Strengthening cooperation between ECN, Parliament and MoF with regard to political parties funding.

Responsibility: ECN, Parliament, MoF

Action 1.1.3 Compile and submit the post-elections report within the prescribed period in terms of section 116 of the Electoral Act.

Responsibility: ECN

Action 1.1.4 Conduct anti-corruption education, and ethics training for political parties and registered organisations under the ECN.

Responsibility: ACC, ECN, political parties, registered organisations

Specific Objective 1.2: Strengthening the integrity and transparency of Parliament

Action 1.2.1 Resources availed to Parliament within the means of the State to ensure that Parliament can carry out its oversight role effectively.

Responsibility: MoF, Parliament

Action 1.2.2 Parliament will annually publish a report on compliance with their specific rules on asset disclosure.

NB: Amend, reform and strengthen the Code of Conduct and Rules of the Parliament as well as specify and provide for the actions and measures, in line with the Namibian Constitution (Article 59 (2)) and the Code of Conduct (Chapter 5), that need to be taken in the event of non-compliance. The regulations should also provide for the protection of the members of Parliament in terms of privacy, human, rights and what should be done with the information provided. It is also recommended that information provided should be subjected to further audits. The Office of the Auditor-General (OAG) should be tasked with the responsibility to audit information declared annually and produce a report.

Responsibility: Parliament

Action 1.2.3 Training courses on the various legislation will be offered to Members of Parliament (MPs) and staff annually.

Responsibility: Parliament

Action 1.2.4 Facilitate periodical seminars for public debates to disseminate best practices on integrity amongst MPs to discuss topical issues related to integrity and corruption annually.

Responsibility: ACC, Parliament

Action 1.2.5 Strengthening of parliamentary and public oversight and follow up action on findings. Parliament should develop punitive measures to take accounting officers to task.

Responsibility: Parliament- PAC

Action 1.2.6 Regular training on budget design and management with MPs and specifically Members of the Parliamentary Standing Committee on Public Accounts to strengthen the oversight function in this regard.

Responsibility: Parliament, OAG, MoF

Strategic Objective 2

Preventing corruption in government offices, ministries and agencies, public enterprises, regional councils, local and traditional authorities

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

The actions under this Strategic Objective focus on reforms in the public sector, at grassroot levels through traditional authorities, and on the administration's internal management, to reduce opportunities and incentives for corruption while seeking to improve service delivery and promote integrity at all levels of society.

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

Action 2.1.1 Periodic review of Business Process and Management Systems to ensure effective service delivery and good governance.

Responsibility: OPM

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

NB: Ministry of Urban and Rural Development (MURD), Association of Local Authorities Namibia (ALAN), Association of Regional Councils (ARC), National Association of Local Authority Officials (NALAO) and Office of the Prime Minister (OPM) are given the task of looking at the legal framework that RCs and LAs use. These are mainly the Public Service Act and Regional Councils Act, as well as the Local Authorities Act. The institutions, as mentioned earlier, were to find the best way to incorporate the declaration of Interest and Assets in the RCs and LAs Act.

Responsibility: MURD, RCs, LAs, OPM

Action 2.1.3 Develop national framework for conducting corruption risk management in public bodies.

Responsibility: ACC, OMAs

Action 2.1.4 Develop a national framework for conducting practices, procedures and system examination in public bodies and build capacity thereof.

Responsibility: ACC, OMAs

Action 2.1.5 Conduct Corruption Risk Assessment and other system examination of procedures on corruption vulnerabilities in OMAs, RCs, LAs as well as public bodies, and provide recommendations for risk mitigation and organisational transformation.

Responsibility: ACC, MPE, MURD, ALAN, ARC

Action 2.1.6 Strengthen policies and capacity building of staff to reduce loopholes that are caused by middleman in the issuing of National Documents.

Responsibility: MHAISS

Action 2.1.7 Develop and implement anti-corruption mechanisms to close loopholes for corruption in the force.

Responsibility: NAMPOL, NCS, MoVDA- NDF, ACC

Action 2.1.8 Develop and implement anti-corruption mechanisms to close loopholes for corruption in works and transport sector.

Responsibility: MWT, NATIS, ACC

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

Action 2.2.1 Establish and operationalise Integrity Committees.

Responsibility: OPM, OMAs, RCs, and PEs

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

Responsibility: OPM, Integrity Committees of all OMAs, RCs

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

Responsibility: MAWLR, LAs, MURD

Action 2.2.4	Develop proper mechanisms for the transparent, equitable allocation and management of land.
Responsibility:	MAWLR, Traditional Authorities, LAs
Action 2.2.5	Ensure protection of natural resources and environment through specific anti-corruption and transparency policies and procedures.
Responsibility:	MEFT, NAMPOL, MoDVA
Action 2.2.6	Promote systems of integrity through specific anti-corruption and transparency policies and procedures in higher education.
Responsibility:	MHETI
Action 2.2.7	Promote systems of integrity through specific anti-corruption and transparency policies and procedures in the public service.
	<i>NB: Key activities (Recruitment, payroll verification and human resource audit)</i>
Responsibility:	OPM, OMAs
Action 2.2.8	Promote systems of integrity through specific anti-corruption and transparency policies, procedures in the health sector.
Responsibility:	MHSS
Action 2.2.9	Develop and implement an Access to Information legislation to ensure access to public information and transparency of decision-making processes to further provide for relevant action to protect information.
Responsibility:	MICT

Specific Objective 2.3: Enhancing transparency and integrity specifically in Public Enterprises

Action 2.3.1 Standardise regulations and policies for PEs.

Responsibility: MPE

Action 2.3.2 Reports and data on the conduct and performance of all PEs are made available publicly per the relevant law.

Responsibility: MPE

Action 2.3.3 Facilitate and conduct corruption awareness and ethics training for PEs staff members in collaboration with ACC.

Responsibility: MPE, ACC

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

Action 2.4.1 Conduct an analysis of all judicial reform initiatives introduced to streamline the efficiency of the judiciary management systems in Namibia.

Responsibility: OoJ

Action 2.4.2 Adequate resources availed to the Judiciary to ensure that the courts have sufficient and well-trained staff (all judicial officers and court support staff).

Responsibility: OoJ

Action 2.4.3 Necessary infrastructural resources and facilities sufficient and necessary for the effective and efficient operation of the courts availed.

Responsibility: MoJ

Specific Objective 2.5: Ensure public financial and asset disclosure for public officials

Action 2.5.1 Develop and implement an online system for declaration of interest and monitoring and evaluation tool within the performance management system.

Responsibility: OPM, OMAs, LRDC, RCs

Action 2.5.2 Conduct training on compliance with the Public Service Staff Rule E.X/II of Conduct, Integrity and Ethics.

Responsibility: OPM, Integrity Committees

Action 2.5.3 Produce an annual report on monitoring and evaluation of declaration of interest for public servants.

Responsibility: OPM, OMAs, RCs

Specific Objective 2.6: Support public procurement system reform and enhance accountability in budget management

Action 2.6.1 Reduce diversion of resources into non-budgetary accounts.

Responsibility: MoF, All public institutions

Action 2.6.2 Complement internal audits with independent external audits.

Responsibility: OAG, OMAs

Action 2.6.3 Enhance budget transparency by strengthening the auditing of public institutions and ensuring that audit reports are produced on time.

Responsibility: OAG

Action 2.6.4 Enhance budget transparency: In year reports to improve the amount of accessible information available on the budget.

Responsibility: MoF

Action 2.6.5 Ensure RCs and LAs capacity in financial management and auditing.

Responsibility: OAG, MURD, LAs, RCs

Action 2.6.6 Strengthen compliance on OMAs to oversee all ITC procurement and ensure that such procurement is only done in consultation with, and certification by OPM.

NB: OPM to conduct more awareness to OMAs and collaborate with MoF for payments only to be made after certification by OPM. OPM should also develop a tool that will strengthen compliance.

Responsibility: OPM, MoF

Action 2.6.7 MoF to continue conducting public awareness activities on public procurement as per the Public Education Strategy year after year.

Responsibility: MoF

Action 2.6.8 Conduct training courses in public procurement for public entities (including internal auditors), the Office of the Auditor-General and private audit firms.

Responsibility: MoF

Action 2.6.9 Capacity development of the PPU staff will continue to take through unaccredited short courses, professional courses and internal capacity development.

Responsibility: MoF

Action 2.6.10 In order to ensure transparency in the procurement system, information on procurement plans, procurement implementation reports, and contract awards will readily be made publicly accessible.

Responsibility: MoF, public institutions

Specific Objective 2.7: Prevent corruption and promote transparency in the extractive industries, fishing and other living marine resources

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

Action 2.7.1 Assess and align current legislation and subordinate legislation with international fishing and other living marine resources industry standards.

Responsibility: MFMR

Action 2.7.2 Assess and align current legislation and subordinate legislation with international extractive industry standards.

Responsibility: MME

Action 2.7.3 Develop proper mechanisms for the transparent and equitable allocation of fishing and other living marine resources rights and or quotas.

Responsibility: MFMR

Action 2.7.4 Improve on the implementation of current policy and regulatory framework in tangent with the UN Food and Agriculture Organization (FAO) Code of Conduct on Responsible Fishing Practices.

Responsibility: MFMR

Action 2.7.5 Provide public education on the fishing and other living marine resources industries.

Responsibility: MFMR

Action 2.7.6 Fishing and other living marine resources industries to adopt and implement specific anti-corruption and transparency policies and procedures.

Responsibility: MFMR

Action 2.7.7 MFMR to establish a committee to deal with grievances and dispute resolutions for the fishing industry.

Responsibility: MFMR

Action 2.7.8 Monitor national grievance and dispute resolution mechanisms w.r.t the extractive industry.

Responsibility: MME

Action 2.7.9 Ensure transparency compliance with international extractive industry standards set by IAEA and KPC, as Namibia is a producer and trader of uranium and diamonds.

NB: Train relevant officials and amend existing or incorporating additional regulatory measures.

Responsibility: MME

Action 2.7.10 Provide public education on the extractive industry.

Responsibility: MME

Action 2.7.11 Review the effectiveness of the diamond beneficiation programmes.

Responsibility: MME

Strategic Objective 3: Strengthening efforts to deter corruption

While a well-functioning, competent and clean judiciary is key in upholding the rule of law, well-crafted anti-corruption laws are believed to be an effective means of deterring corrupt conduct and ensuring justice by bringing to book the corrupt individuals.

The actions under this Strategic Objective focus mainly on strengthening the anti-corruption laws and capacitating the offices of the ACC, PG, OoJ and MoJ.

Specific Objective 3.1 Strengthening the Anti-Corruption Commission

Action 3.1.1 Develop and implement an ACC staff recruitment, promotion and retention policy

Responsibility: ACC, OPM

Action 3.1.2 Strengthen ACC's financial capacity to enable it to carry out its mandate effectively.

Responsibility: Parliament, ACC, MOF

Action 3.1.3 Strengthen the capacity of ACC public education and corruption prevention officers, investigators as well as prosecutors through extensive joint training.

Responsibility: ACC, PG

Action 3.1.4 Monitor delays in corruption cases, the reasons for these delays, and provide recommendations to eliminate unnecessary delays.

NB: Relating to investigation and prosecution of corruption cases.

Responsibility: OoJ, ACC, PG

Specific Objective 3.2: Strengthening anti-corruption legislation

Action 3.2.1	Amend the Anti-Corruption Act, 2003 to include the solicitation for or acceptance of a bribe by a foreign public official or an official of an international public organisation as a criminal offence. Amend the Anti-Corruption Act, 2003 to include embezzlement by a person in the private sector as a corrupt practice. Amend the Anti-Corruption Act, 2003 to ensure strengthening of Public Education and Corruption Prevention in conducting system examination.
Responsibility:	ACC, MoJ, OAG
Action 3.2.2	Combat illicit enrichment inclusive of enabling tax authorities to conduct lifestyle audits.
Responsibility:	MOF
Action 3.2.3	Amend the Criminal Procedure Act, 1977 to include the corrupt practices referred to section 1 of the Anti-Corruption Act, 2003 in the list of offences provided for in Schedule 1 and Part IV of Schedule 2 to the Act.
Responsibility:	MoJ, ACC
Action 3.2.4	Amend the Prevention of Organised Crime Act, 2004 (POCA) to align it with the Anti-Corruption Act, 2003. In particular, the definitions of 'authorised member of police' and 'member of the police' should be extended to include authorised officers of ACC, to enable such officers to enforce POCA.
Responsibility:	MoJ, ACC
Action 3.2.5	Implement and monitor both Whistleblower Protection Act, 2017 (Act No. 10 of 2017) and Witness Protection Act, 2017 (Act No. 11 of 2017).
Responsibility:	MoJ
Action 3.2.6	Develop and enact an Audit Bill to ensure Auditor-General Reports are followed by rectified accounts.
Responsibility:	OAG, relevant committees of Parliament

Specific Objective 3.3: Addressing public institutions' specific vulnerabilities

Action 3.3.1 Monitor the register of business entities and individuals who are barred from undertaking government-related work due to previous irregularities and dishonesty or corruption convictions.

Responsibility: MoF

Action 3.3.2 Monitor the implementation of the Public Service Staff Rules amended to extend the definition of 'major offences' to include corrupt practices as contemplated in Chapter 4 of the Anti-Corruption Act, 2003.

Responsibility: OPM, OMAs

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

Responsibility: FIC, PG, NAMPOL, NAMRA, BoN- Exchange Control Department

Strategic Objective 4: Conducting extensive anti-corruption education

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

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

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

Action 4.1.1 Ensure participation of staff of OMAs, RCs and LAs at periodical training courses on ethics and integrity.

Responsibility: ACC, OPM, NIPAM, OMAs, ALAN, ARC, NALAO, NAPWU

Action 4.1.2 Implement a training programme on ethics, integrity and anti-corruption for school teachers.

Responsibility: MoEAC, ACC, NANTU

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

Action 4.2.1 Organise periodical consultations and public debates for promoting the best anti-corruption practices within local and regional authorities and increasing citizens' confidence.

Responsibility: ALAN, ARC, NALAO, ACC

Action 4.2.2 Organise awareness sessions on corruption and ethics for the public to enhance general knowledge and understanding.

Responsibility: ACC

Action 4.2.3 Monitor delivery of the anti-corruption theme in the civic life skills subject in schools.

Responsibility: MoEAC (NIED), ACC

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

Responsibility: MICT

Strategic Objective 5: Preventing corruption in the private sector

Weak and poorly governed or managed institutions not only result in inefficiency, but they also encourage corruption. Business associations are a means of engaging in collective action, providing a more powerful and unified voice and protecting the single businesses from potential backlashes or competitive disadvantage while pursuing ethical business practices.

The Companies Act , 2004 (Act No. 28 of 2004) ('the Act') contains several provisions that will directly impact on companies, their directors and officers. The Act was amended to amongst others remove gender bias and to standardise company secretarial documents and update penalties and fees. This Strategic Objective seeks to foster cooperation with private companies to prevent and deter corruption.

Specific Objective 5.1: Supporting transparency and integrity in private enterprises

Action 5.1.1 Assist enterprises in the private sector in developing internal integrity systems compliance procedures and ethics codes. Further, integrate anti-corruption awareness.

Responsibility: NCCI, CIF, NTF, SME Compete, NIPDB, NEF

Action 5.1.2 Facilitate the enactment and oversee implementation of New Business Entity Bill.

NB: The legislation would aid in simplifying bureaucratic procedures for service to private and public companies.

Responsibility: BIPA

Action 5.1.3 Ensuring that private and public companies, taking into account their structure and size, have sufficient internal auditing controls to help prevent and detect acts of corruption and that the accounts and required financial statements of such private enterprises are subject to appropriate auditing and certification procedures.

Responsibility: BIPA

Action 5.1.4 Promoting transparency among private entities, including where appropriate, measures regarding the identity of legal and natural persons involved in the establishment and management of corporate entities.

Responsibility: BIPA

Action 5.1.5 Extractive industry bodies to adopt and implement specific anti-corruption and transparency policies and procedures.

Responsibility: Chambers of Mines, MME

Strategic Objective 6: Engaging civil society, non-governmental organisations, and the media in combating corruption

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

Specific Objective 6.1: Supporting transparency in civil society and non-governmental organisations

Action 6.1.1 Organising anti-corruption public dialogue, ethics training and corruption awareness at national, regional and local levels.

Responsibility: NID, IPPR, ACC, CIVIC +264, CCN, ACPCN, REGIONAL FORUMS, LEGAL ASSISTANCE CENTRE, HANNS SEIDEL FOUNDATION

Action 6.1.2	Continuously engage relevant CSOs to assist in research on anti-corruption issues.
Responsibility:	IPPR, NID, CIVIC+264, NGOS, LEGAL ASSISTANCE CENTRE
Action 6.1.3	Review existing legal and regulatory environment for civic organisations to provide a parallel complementary voluntary registration system for CSOs and simplify the formal registration of CSOs as provided for in the Civic Organisations Partnership Policy of 2005. The National Planning Commission needs to increase efforts on board all CSOs in order for the Civic Organizations Partnership Policy of 2005 to be realised.
Responsibility:	NPC, CSOs, NGOs, CCN, Faith-Based Organisations
Action 6.1.4	Encourage transparency initiatives through the development and implementation of comprehensive CSOs codes of conduct on ethics.
Responsibility:	NPC, MHSS, NACC, CIVIC +264
Action 6.1.5	Enhance collaboration with the academic community on corruption issues (research and programmes).
Responsibility:	UNAM, NUST, IUM, ACC and other tertiary institutions
Action 6.1.6	Development of unaccredited and accredited anti-corruption training courses and delivery thereof, by institutions of higher learning.
Responsibility:	UNAM, NUST, IUM, NIPAM, ACC and other tertiary institutions

Specific Objective 6.2: Supporting the role of the media

Action 6.2.1	Continue to build and maintain an enabling environment for free media in line with the Namibian Constitution.
Responsibility:	MICT, EFN

Action 6.2.2	Conduct public education seminars on corruption for media houses and enhance partnership with media houses in the fight against corruption.
Responsibility:	ACC, MICT, EFN
Action 6.2.3	Conduct training of investigative journalists on anti-corruption related issues as a priority.
Responsibility:	EFN, MICT, ACC, NUST-Department of Communication, UNAM-School of Humanities, Society and Development
Action 6.2.4	The Media Ombudsman to create awareness and popularise the office of the media ombudsman and the 'Self-Regulatory Code of Ethics and Conduct for Namibian Print, Broadcast and Online Media'. Also, sensitising the public about the fact it does not cover freelance and citizen journalism.
Responsibility:	Media Ombudsman, EFN

Strategic Objective 7

Preventing corruption and promoting accountability in the sports fraternity

Misappropriation of funds meant for the smooth running of the sport bodies in the country, alleged inconsistency in the reward system meant to motivate athletes and infighting among sport administrators are some of the factors that impact negatively within the country's sport fraternity. Amendments to the law governing the sport administration are needed to cater for the proper accounting of sport related funds, and to motivate, protect and appreciate athletes for their contributions towards sport.

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

Specific Objective 7.1: Supporting transparency and integrity in sports

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

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

Responsibility: NSC, MSYNS

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

The youth is the backbone of any nation, and Namibia is no exception. Since the youth have the capacity to break the chain of corruption, it is crucial that they actively engage in anti-corruption programmes. Such participation is imminent in enforcing ethos and continuity of moral fibre across generations, subsequently resulting in a responsible and corrupt-free citizenry.

The actions under this Strategic Objective focus on improving the understanding of youth on corruption, ethics and integrity through training and dialogue.

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

Action 8.1.1 Develop and implement a training programme on ethics, integrity and anti-corruption for youth leadership in all 14 regions.

Responsibility: MSYNS, NYC, NYS, NANSO, Youth Wings of Political Parties, ACC, RCs, LAs

Action 8.1.2 Conduct dialogue sessions on anti-corruption, good governance, ethics and integrity for youth.

Responsibility: NYC, NYS, MSYNS, NANSO, Youth Wings of Political Parties
ACC, Anti-Corruption Education Consultancy, CCN, Scouts of Namibia

Section 3:

Structure and

Implementation

Plan

-
- 3.1 Strategy Structure and Monitoring
 - 3.1.1 Structure: Implementing & Monitoring Bodies
 - 3.1.2 NACSAP Steering Committee
 - 3.2 Monitoring and Evaluation Plan
 - 3.3 Namibia Action Plan for the Implementation of the National Anti-Corruption Strategy 2021-2025

3.1 Strategy Structure and Monitoring

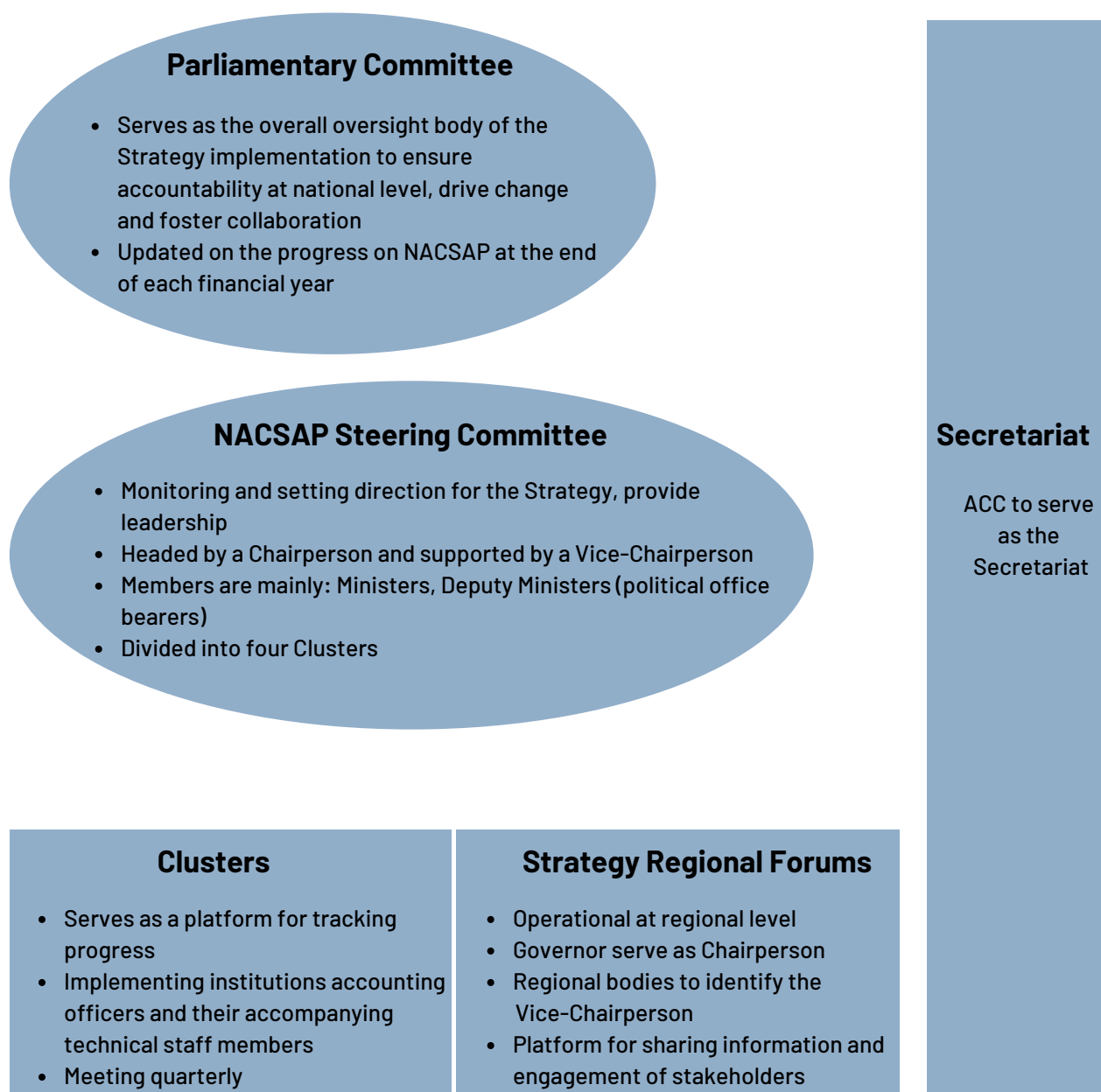
A National Steering Committee will monitor the overall implementation of the Strategy to track progress. The Strategy structure is one of the best practices derived from the previous Strategy. Identified implementing institutions will execute the 95 actions, which, as with the other components such as the structure are informed by the following eight (8) Strategic Objectives:

- Strategic Objective 1: Increasing the level of political accountability and transparency
- Strategic Objective 2: Preventing corruption in government offices, ministries and agencies, public enterprises, regional councils, local and traditional authorities
- Strategic Objective 3: Strengthening efforts to deter corruption
- Strategic Objective 4: Conducting extensive anti-corruption education
- Strategic Objective 5: Enhance measures and increase accountability to prevent corruption in the private sector
- Strategic Objective 6: Engaging civil society, non-governmental organisations and the media in combating corruption
- Strategic Objective 7: Preventing corruption and promoting accountability in the sports fraternity
- Strategic Objective 8: Enhance engagement and participation of youth in anti-corruption programmes

For this Strategy, the Clusters and Steering Committee structures were retained as a best practice since they were instrumental in fostering cooperation and would serve as platforms to account for actions and exchange ideas. The Strategy has, additionally, considered political office bearers (i.e, ministers and/ or deputy ministers) and board members to be members of the Steering Committee. This is imperative to strengthen the monitoring of the implementation process. The membership of Cluster comprise accounting officers (executive directors) and chief executive officers (CEOs).

An additional monitoring structure in the form of the Strategy Regional Forums, chaired by the Governors of the 14 regions, has also been included to ensure inclusivity, ownership and accountability at all levels of society.

3.1.1 Structure: Implementing & Monitoring Bodies

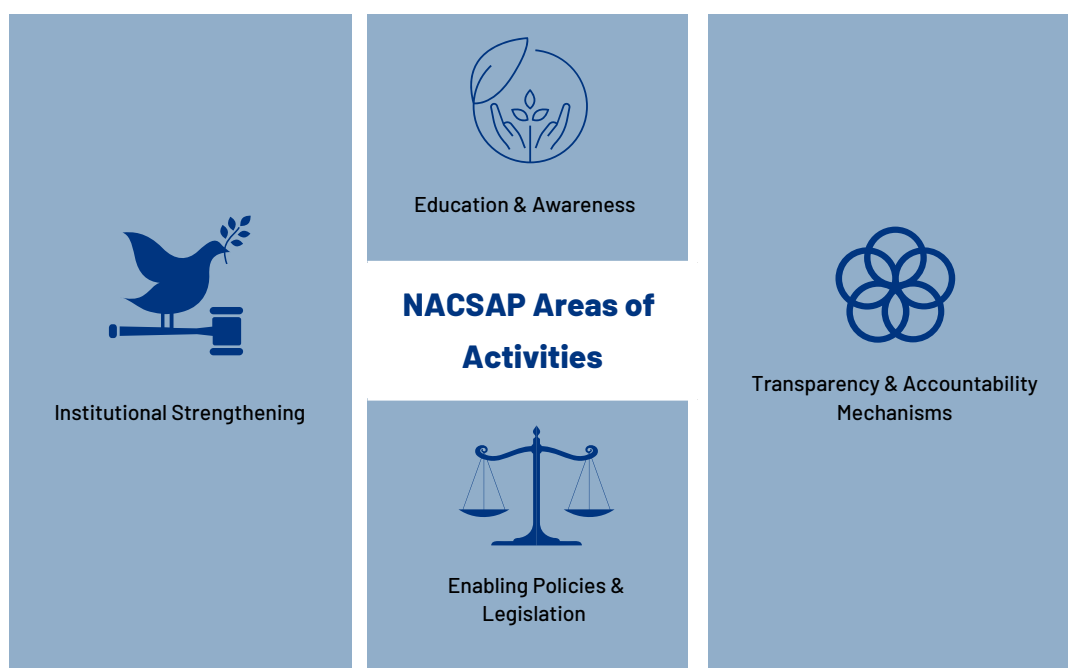


ACC staff members will serve as Secretariat for the Strategy implementing and monitoring bodies.

The Secretariat will develop a Monitoring and Evaluation Plan for the Strategy, which will serve as a tool for improved strategy execution. The plan would complement the existing monitoring and reporting process to ensure efficiency, effectiveness and account for actions and implementation.

Moreover, KPIs and targets are expected to become more precise and SMART (Specific, Measurable, Achievable, Realistic and Timely), which will be carried out by the vital implementing institutions.

The Steering Committee efforts will be supported by four Clusters, with each Cluster overseeing the implementation of actions under one or more Strategy objectives. This is imperative in order to strengthen the monitoring of the NACS implementation process. Activity grouping analysis such as Education and Awareness; Institutional Strengthening; Transparency and Accountability Mechanisms; and Enabling Policies and Legislation explains the reason for having four clusters.



Cluster 1	<ul style="list-style-type: none"> • Strategic Objective 1: Increasing the level of political accountability and transparency • Strategic Objective 3: Strengthening efforts to deter corruption
Cluster 2	<ul style="list-style-type: none"> • Strategic Objective 2: Preventing corruption in government offices, ministries and agencies, public enterprises, regional councils, local and traditional authorities
Cluster 3	<ul style="list-style-type: none"> • Strategic Objective 4: Conducting extensive anti-corruption education • Strategic Objective 6: Engaging civil society, non-governmental organisations and the media in combating corruption • Strategic Objective 8: Enhance engagement and participation of youth in anti-corruption programmes
Cluster 4	<ul style="list-style-type: none"> • Strategic Objective 5: Enhance measures and increase accountability to prevent corruption in the private sector • Strategic Objective 7: Preventing corruption and promoting accountability in the sports fraternity

The Steering Committee, with the support from implementing institutions and the Secretariat, will undertake robust communication through the media to keep the public informed on the progress made with the implementation of the activities under the Strategy. Awareness and communication of such progress is aimed to influence perceptions, encourage participation by stakeholders at all levels, and stimulate changes in behaviours, attitudes, practices and policies.

3.1.2 NACSAP Steering Committee

The implementation and coordination of the NACSAP will be the responsibility of the Strategy Steering Committee. The composition of the Steering Committee was dictated by the number of actions to be implemented by a particular institution as well as by the critical role of an institution in ensuring the overall success in the implementation of the Strategy as informed by the lessons learned with the implementation of the NACS 2016-2019.

- Office of the President
- Office of the Prime Minister
- Office of the Attorney-General
- Anti-Corruption Commission
- Council of Churches in Namibia
- Electoral Commission of Namibia
- Ministry of Information and Communication Technology
- Ministry of Mines and Energy
- Ministry of Finance
- Ministry of Home Affairs, Immigration, Safety and Security
- Ministry of Justice
- Ministry of Public Enterprises
- Ministry of Urban and Rural Development
- Namibia Employers' Federation
- National Planning Commission
- Namibia Chambers of Commerce and Industry
- National Youth Council of Namibia
- Office of the Auditor-General
- Office of the Ombudsman
- The Editor's Forum of Namibia
- Financial Intelligence Centre
- Civil Society Information Centre Namibia

3.2 Monitoring and Evaluation Plan

The Secretariat has developed a NACSAP Monitoring and Evaluation Plan as part of the Anti-Corruption Commission's commitment under the National Anti-Corruption Strategy and Action Plan 2021-2025. The Monitoring and Evaluation Plan is to be utilised by the Secretariat to ensure accurate reporting on implementation of NACSAP and it is to -

- 3.2.1 serve as a tool for managing the monitoring and evaluation of the NACSAP and describe how institutions undertake and coordinate the NACSAP monitoring and evaluation process;
- 3.2.2 provide a framework which defines the logic model and the performance measurement, how the results of NACSAP activities link to the achievement of government strategic priorities, and what and how indicators will be measured.

3.3 Namibia Action Plan for the Implementation of the National Anti-Corruption Strategy 2021-2025

NAMBIA ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTI-CORRUPTION STRATEGY 2021-2025							
Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
Strategic Objective 1 - Increasing the level of political accountability and transparency							
Specific Objective 1.1: Increasing the transparency of political party financing							
1.1.1.1	Annual reviews on whether provisions of party transparency as contained in Chapter 4 of the Electoral Act, 2014 have been complied with. Annual reports thereon will be published and submitted to Parliament. Each report will investigate any reasons for non-compliance and will offer solutions.	Number of reports published and submitted to Parliament	Political party documentation	Parties unwilling to cooperate Political parties would lack capabilities	ECN Parliament MoF	ECN budget	2 nd quarter of every year
1.1.1.2	Strengthening cooperation between ECN, Parliament and MoF with regard to political parties funding.	Number of formal platforms created	Engagement reports, notes and minutes	Unwillingness by parties to cooperate	ECN Parliament MoF	MoF budget/ Treasury allocation	Annually
1.1.1.3	Compile and submit the post-elections report within the prescribed period in terms of section 116 of the Electoral Act.	Number of reports published Number of recommendations for regulatory reform made	Consultation minutes	Difficulties in discovering and investigating irregularities	ECN	ECN budget	Immediately subsequent to each election held
1.1.1.4	Conduct anti-corruption education, and ethics training for political parties and organisations registered under the ECN.	Number of political parties and registered organisations and functionaries trained	Attendance register, photos, annual report	Low level of participation Limited resources	ACC ECN Political parties & registered organisations	ACC budget	Train ten political parties during the implementation period- annually

Specific Objective 1.2: Strengthening the integrity and transparency of Parliament									
1.2.1	Resources availed to Parliament within the means of the State to ensure that Parliament can carry out its oversight role effectively.	% increase in budget allocation to NA and NC	National Budget Reports	Inadequate resources	MoF parliament	MoF budget	Annually		
1.2.2	Parliament will annually publish a report on compliance with their specific rules on asset disclosure.	Number of compliance reports published Number of violations	Compliance reports	Lack of implementation and coordination	Parliament	Parliament budget	Annually		
1.2.3	Training courses on various legislation will be offered to MPs and staff annually.	Number of MPs and staff taking part in training courses Number of training courses presented	Integrity reports	MPs may be unwilling to participate	Parliament	Parliament budget	Annually		
1.2.4	Facilitate periodical seminars for public debates to disseminate best practices on integrity amongst MPs to discuss topical issues related to integrity and corruption annually.	Number of seminars for public debates held Report produced	Media releases Reports on events Attendance register	Low level of participation by MPs	ACC, Parliament	Parliament budget	Annually		
1.2.5	Strengthening of parliamentary and public oversight bodies and follow up action on findings. Parliament should develop punitive measures to take accounting officers to task.	Number of corrective measures developed % of progress made on implementation	Media releases Reports on events Documentation	Lack of implementation	Parliament-PAC	Parliament budget	Annually		
1.2.6	Regular training on budget design and management with MPs and specifically Members of the Parliamentary Standing Committee on Public Accounts to strengthen the oversight function in this regard.	Number of training workshops	Annual reports Attendance register	Low level of participation by MPs	Parliament OAG MoF	Parliament Ministerial/ institutional budgets	Annually		

Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
Strategic Objective 2 - Preventing corruption in government offices, ministries, agencies, public enterprises, regional councils, local and traditional authorities							
Specific Objective 2.1: Addressing public institutions' specific vulnerabilities by systematic implementation of preventative measures							
2.1.1	Periodic review of Business Process and Management Systems to ensure effective service delivery and good governance.	% of progress made on periodic review	Process re-engineering and e-government reports	Lack of systematic collection Mechanism for the required data	OPM	OPM budget	Quarterly
2.1.2	Revision and harmonisation of the public sector systems and legislation inclusive of RCs & LAs to ensure that they uphold the principles of good governance.	% of progress made on harmonization of systems and legislation	Legislation review reports	Resistance to uphold the principles of good governance	MURD RCs LAs OPM	Ministerial/ institutional budgets	Annually
2.1.3	Develop a national framework for conducting corruption risk management in public bodies.	% of progress made in developing a National framework for conducting corruption risk management	National framework document Annual reports	Lack of or non-adoption of standardised national framework for conducting corruption risk management	ACC OMAs	ACC/ Ministerial/ institutional budgets	Annually
2.1.4	Develop a national framework for conducting practices, procedures and system examination in public bodies and build capacity thereof.	% of A National framework for conducting practices, procedures and system examination in place by 2023	National framework document Annual report	Lack of capacitated officials to develop national framework	ACC OMAs	ACC budget/ Ministerial/ institutional budgets	Annually

2.1.5	Conduct Corruption Risk Assessment and other system examination of procedures on corruption vulnerabilities in OMAs, RCs, LAs as well as public bodies, and provide recommendations for risk mitigation and organisational transformation.	Number of corruption risk assessments conducted	Risk assessment report Annual reports	Limited resources Lack of cooperation by public bodies.	ACC MPE MURD ALAN ARC	Ministerial/ institutional budgets	Quarterly
2.1.6	Strengthen policies and capacity building of staff to reduce loopholes that are caused by middleman in the issuing of National Documents.	Number of policies developed and staff capacitated	Policies and capacity building reports	Unwillingness to strengthen policies and staff not capacitated	MHAISS	MHAISS budget	Annually
2.1.7	Develop and implement anti-corruption mechanisms to close loopholes for corruption in the force(s).	Number of anti-corruption mechanisms developed and implemented	Annual reports	Unwillingness to develop and implement anti-corruption mechanisms	MHAISS- NAMPOL MoDVA- NDF ACC	Ministerial/ institutional budgets	Annually
2.1.8	Develop and implement anti-corruption mechanisms to close loopholes for corruption in works and transport sector.	Number of Anti-corruption mechanisms developed and implemented to close loopholes for corruption in works and transport sector	Anti-corruption mechanism reports	Unwillingness to develop and implement anti-corruption mechanisms	MWT NATIS ACC	Ministerial / institutional Roads Authority budgets	Annually

Specific Objective 2.2: Enhancing accountability, transparency and integrity specifically in public institutions								
2.2.1	Establish and operationalise the Integrity Committees.	# of Integrity Committees established and operationalized	Annual reports	Lack of support towards Integrity Committees at institutional level	OPM OMA's RCs PEs	Institutional budgets	Quarterly	
2.2.2	Enforce the signing of the one-page integrity pledge to uphold and guide ethical conduct, including integrity, honesty, objectivity and impartiality.	# of signed integrity pledges	Signed integrity pledges Integrity Committee reports	Unwillingness to sign the integrity pledge	OPM Integrity Committees of all OMA's RCs PEs	Ministerial/ institutional budgets	Annually	
2.2.3	Ensure transparency and compliance in the allocation and distribution of agricultural, veterinary and water sector initiatives.	Number of reforms/ initiatives made	Annual reports	Lack of resources	MAWLR LAs MURD	Ministerial/ institutional budgets	Quarterly	
2.2.4	Develop proper mechanisms for the transparent and equitable allocation of land.	Number of mechanisms for the transparent and equitable allocation of land developed.	Annual report	Lack of resources	MAWLR Traditional Authorities LAs	Ministerial/ institutional budgets	Quarterly	
2.2.5	Ensure protection of natural resources and environment through specific anti-corruption and transparency policies and procedures.	Number and types of reforms made	Institutional reports	Anti-corruption and transparency policies and procedures not adhered to	MEFT NAMPOL MoDVA	MEFT/ institutional budgets	Quarterly	
2.2.6	Promote systems of integrity through specific anti-corruption and transparency policies and procedures in higher education.	Number and types of systems of integrity promoted	Reports	Insufficient human and financial resources	MHETI	MHETI budget	Annually	
2.2.7	Promote systems of integrity through specific anti-corruption and transparency policies and procedures in the public service. NB: Key activities (recruitment, payroll verification and human resource audit).	Number and types of systems of integrity promoted	Reports	Insufficient human and financial resources	OPM OMA's	Ministerial/ institutional budgets	Annually	

2.2.8	Promote systems of integrity through specific anti-corruption and transparency policies, procedures in the health sector.	Number and types of systems of integrity promoted	Reports	Insufficient human and financial resources	MHSS	MHSS budget	Annually
2.2.9	Develop and implement an Access to Information legislation to ensure access to public information and transparency of decision-making processes to further provide for relevant action to protect information	% of progress made on the development of access to information legislation operationalized	Annual reports	Insufficient resources	MICT	MICT Budget	Annually

Specific Objective 2.3: Enhancing transparency and integrity specifically in public enterprises							
2.3.1	Standardise regulations and policies for PEs.	% of progress made in standardizing regulations and policies	Gazette	Inadequate resources	MPE	MPE OPM and other relevant offices ministries and agencies budgets	Quarterly
2.3.2	Reports and data on the conduct and performance of all PEs are made available publicly per the relevant law.	Number and types of reports published	Reports	Insufficient human resources	MPE	MPE/ PEs institutional budgets	Annually
2.3.3	Facilitate and conduct corruption awareness and ethics training for PEs staff members in collaboration with ACC.	Number of training sessions and staff trained	Corruption awareness and ethics training reports	Lack of cooperation by public enterprises staff	MPE MURD ACC	Ministerial/ institutional budgets	Quarterly
Specific Objective 2.4: Strengthening the integrity and transparency of the judiciary							
2.4.1	Conduct an analysis of all judicial reform initiatives introduced to streamline the efficiency of the judiciary management systems in Namibia.	Analytic report produced Number of Magistrates' Courts linked to NAMCIS system E-Justice fully functional at High Court level	Consultations Documents	Delays in implementation and budget constraints	OoJ	OoJ budget	Annually
2.4.2	Adequate resources availed to the Judiciary to ensure that the courts have sufficient and well-trained staff (all judicial officers and court support staff).	Budget allocations Number of staff well-trained	National Budget JSC and MC reports	Lack of implementation and coordination	OoJ MoF	OoJ and MoF budgets	Annually

2.4.3	Necessary infrastructural resources and facilities sufficient and necessary for the effective and efficient operation of the courts availed.	Budget allocations, Number of new infrastructure upgraded	National Budget JSC and MC reports	Lack of implementation and coordination	MoJ	MoJ budget	Annually
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Specific Objective 2.5: Ensure public financial and asset disclosure for public officials							
2.5.1	Develop and implement an online system for declaration of interest and monitoring and evaluation tool within the performance management system.	% of progress made to develop online system % of progress made to develop the M&E tool	Reports, system/tool	Budget limitations	OPM OMAs LRDC RCs	Ministerial/ institutional budgets	Quarterly
2.5.2	Conduct training on compliance with the Public Service Staff Rule E.X/II of Conduct, Integrity and Ethics.	Number of training sessions undertaken for OMAs	Reports Feedback by participants	Low level of participation	OPM Integrity Committees	Ministerial/ PEs institutional budgets	Annually
2.5.3	Produce an annual report on monitoring and evaluation of declaration of interest for public servants.	Number of annual Report produced	Annual report	Lack of participation Inadequate resources and capacity	OPM OMAs RCs	Limited to the approved budget	Annually

Specific Objective 2.6: Support public procurement system reform and enhance accountability in budget management							
2.6.1	Reduce diversion of resources into non-budgetary accounts.	Amounts allocated via non budgetary accounts	National budget reports	Difficulties related to the exchange of information between institutions	MoF OAG All public institutions	Ministerial/ institutional budgets	Permanent action with annual assessment
2.6.2	Complement internal audits with independent external audits.	Number of independent external audits conducted	Audit reports	Lack of cooperation from OMAs	OAG OMAs	Limited to the approved budget	Annually
2.6.3	Enhance budget transparency by strengthening the auditing of public institutions and ensuring that audit reports are produced on time.	Number of statements submitted, number of audit reports issued	Statements Audit reports	Non submission of statements Insufficient resources	OAG	OAG budget	Annually
2.6.4	Enhance budget transparency: In year reports to improve the amount of accessible information available on the budget	Number of reports issued	Budget Reports	Insufficient resources	MoF	MoF budget	Annually
2.6.5	Ensure RCs and LAs capacity in financial management and auditing.	Number of training courses presented, Number of institutions and participants trained	Training materials Reports	Unwilling to participate	OAG MURD LAs RCs	OAG/ Institutional budgets	Annually
2.6.6	Strengthen compliance on OMAs to oversee all ITC procurement and ensure that such procurement is only done in consultation with, and certification by OPM. NB: OPM to conduct more awareness to OMAs and collaborate with MoF for payments only to be made after	Number of institutions compliant with ITC procurement Number of awareness conducted	ITC procurement reports/ Documents Training material Training report Compliance tool developed	Unwilling to comply Lack of cooperation	OPM MoF	Ministerial/ institutional budgets	Annually

2.6.9	Capacity development of the PPU staff will continue to take through unaccredited short courses, professional courses and internal capacity development.	Number of trainings and staff trained	Documents	Lack of participation	MoF	Limited to the approved budget	Annually
2.6.10	In order to ensure transparency in the procurement system, information on procurement plans, procurement implementation reports, and contract awards will readily be made publicly accessible	Number of procurement plans, plans, contract awards made	Public documents on procurement plans, procurement implementation reports, and contract awards Media releases	Unwillingness to cooperate Lack of resources	MoF Public institutions	MoF/ institutional budgets	Annually

Specific Objective 2.7: Prevent corruption and promote transparency in the extractive industries, fishing and other living marine resources							
2.7.1	Assess and align current legislation and subordinate legislation with international fishing and other living marine resources industry standards.	Number of current reports assessed Number of legislation aligned with international fishing and other living marine resources industry standards.	Assessment report	No cooperation from industry representatives	MFMR	MFMR budget	Annually

2.7.2	Assess and align current legislation and subordinate legislation with international extractive industry standards.	Number of current legislation assessed Number of legislation aligned with international standards.	Assessment report African Mining Legislation ATLAS www.a-mla.org	No cooperation from industry representatives. Delay in the finalisation of the legislation	MME	MME budget	Annually
2.7.3	Develop proper mechanisms for the transparent and equitable allocation of fishing and other living marine resources rights and or quotas.	Number of mechanisms developed	Policy documents	Inadequate resources	MFMR	MFMR budget	Annually
2.7.4	Improve on the implementation of current policy and regulatory framework in tangent with the UN Food and Agriculture Organisation (FAO) Code of Conduct on Responsible Fishing Practices.	% increase in the implementation / improvement of policies and regulatory frameworks Number of policies and regulatory frameworks	Policies Regulatory frameworks	Time delays	MFMR	MFMR budget	Annually
2.7.5	Provide public education on the fishing and other living marine resources industries.	Number of educational campaigns held	Reports Media material	No cooperation from industry representatives	MFMR	MFMR budget	Annually
2.7.6	Fishing and other living marine resources industries to adopt and implement specific anti-corruption and transparency policies and procedures.	Number of policies and procedures adopted and implemented	Industry management policies and procedures	No cooperation from industry representatives	MFMR	MFMR budget	Annually

2.7.7	MFMR to establish a committee to deal with grievances and dispute resolutions for the fishing industry.	Committee established and operationalized	Appointment letters Documents Committee ToR Committee minutes	Unwilling to participate	MFMR	MFMR budget	Annually
2.7.8	Monitor national grievance and dispute resolution mechanisms w.r.t the extractive industry.	Number of grievances received per month % of grievances and disputes resolved	Reports, Mineral Ancillary Right Commission (MARC) hearing minutes, Court Verdicts	Lack of cooperation by parties involved	MME	MME budget	Annually
2.7.9	Ensure transparency compliance with international extractive industry standards set by IAEA and KPC, as Namibia is a producer and trader of uranium and diamonds. <i>NB: Train relevant officials and amend existing or incorporating additional regulatory measures.</i>	Number of industry standards complied with Number of officials trained	Gazette Performance review reports	Non-compliance from industry representatives	MME	MME budget	Annually
2.7.10	Provide public education on the extractive industry.	Number of public education sessions held	Reports Media materials	Lack of capacity and resources to create awareness and train public	MME	MME budget	Annually
2.7.11	Review the effectiveness of the diamond beneficiation programmes	% Progress achieved on review of the diamond beneficiation program in the country.	Review Progress reports	Resistance by industry to provide the required information	MME	MME budget	Annually

Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
Strategic Objective 3 - Strengthening efforts to deter corruption							
Specific Objective 3.1: Strengthening the Anti-Corruption Commission							
3.1.1	Develop and implement an ACC staff recruitment, promotion and retention policy	% of progress made to develop and implement recruitment and retention policy	Policy	Non-approval of amended ACA	ACC OPM	ACC budget	Annually
3.1.2	Strengthen ACC's financial capacity to enable it to carry out its mandate effectively.	% increase in budgetary allocation to ACC	MTEF appropriation budget	Budgetary constraints	Parliament MoF ACC	Parliament/ MoF budgets	Annually
3.1.3	Strengthen the capacity of ACC public education and corruption prevention officers, investigators as well as prosecutors through extensive joint training.	Number of staff trained and skilled at ACC and PG.	Annual reports Training manual Attendance register	Lack of capacity	ACC PG	ACC/ PG budgets	Annually
3.1.4	Monitor delays in corruption cases, the reasons for these delays, and provide recommendations to eliminate unnecessary delays. <i>NB: Relating to investigation and prosecution of corruption cases.</i>	% progress made monitoring delays in corruption cases Number of recommendations provided	Reports	Insufficient resources Unwilling to cooperate	OoJ ACC PG	ACC, PG, OoJ budgets	Annually

Specific Objective 3.2: Strengthening anti-corruption legislation									
3.2.1	<ul style="list-style-type: none"> - Amend the Anti-Corruption Act, 2003 to include the solicitation for or acceptance of a bribe by a foreign public official or an official of an international public organisation as a criminal offence. - Amend the Anti-Corruption Act, 2003 to include embezzlement by a person in the private sector as a corrupt practice. - Amend the Anti-Corruption Act, 2003 to ensure strengthening of Public Education and Corruption Prevention in conducting system examination 	% of progress made towards the amendment of the Act.	Anti-Corruption Act amended	Limited human resource Time delays	ACC MoJ OAG	ACC and MoJ budgets	Annually		
3.2.2	Combat illicit enrichment inclusive of enabling tax authorities to conduct lifestyle audits.	Number of lifestyle audits conducted	Reports	Might be unconstitutional	MoF	MoF budget	Annually		
3.2.3	Amend the Criminal Procedure Act, 1977 to include the corrupt practices referred to section 1 of the Anti-Corruption Act, 2003 in the list of offences provided for in Schedule 1 and Part IV of Schedule 2 to the Act.	% of progress made toward the amendment of CPA	Amendment consultation sessions, Promulgation in Parliament, Gazette, Criminal Procedure Act as amended	Lack of support from relevant stakeholders Time delays	MoJ ACC	MoJ budget	Annually		
3.2.4	Amend the Prevention of Organised Crime Act, 2004 (POCA) to align it with the Anti-Corruption Act, 2003. In particular, the definitions of "authorised member of police" and "member of the police" should be extended to include authorised officers of ACC, to enable such officers to enforce POCA.	% of progress made towards the amendment of POCA	Amendment consultation sessions Promulgation in Parliament Gazette POCA as amended	Lack of support from relevant stakeholders Time delays	MoJ ACC	MoJ budget	Annually		
3.2.5	Implement and monitor both Whistleblower Protection Act, 2017 (Act No. 10 of 2017) and Witness Protection Act, 2017 (Act No. 11 of 2017).	% progress made on the implementation of the Acts	National budget, Reports	Inadequate resources , Lack of cooperation from stakeholders	MoJ	MoJ budget	Annually		
3.2.6	Develop and enact an Audit Bill to ensure Auditor-General Reports are followed by rectified accounts.	% progress made towards the development and enactment of Audit Bill	Audit bill, Reports	Time delays, Limited Resources	OAG Relevant committees of Parliament	OAG Budget	Annually		

Specific Objective 3.3: Addressing public institutions' specific vulnerabilities							
3.3.1	Monitor the register of business entities and individuals who are barred from undertaking government-related work due to previous irregularities and dishonesty or corruption convictions.	Number of business entities and individuals barred	Institutional reports	Insufficient human resources	MoF	MoF budget	Annually
3.3.2	Monitor the implementation of the Public Service Staff Rules amended to extend the definition of "major offences" to include corrupt practices as contemplated in Chapter 4 of the Anti-Corruption Act, 2003.	% of preventative measures implemented and enforced	Public Service reports	Lack of implementation and enforcement of preventative measures Time delay	OPM OMAs	Ministerial/ institutional budgets	Annually
3.3.3	Review progress made on preventing and combating laundering of the proceeds of crime.	Number and type of POCA 2004 civil asset forfeiture cases; POCA 2004 and predicate offence criminal prosecutions; Tax Assessment raised and collected by NAMRA on tax evasion matters which involve the POCA 2004 and the FIA 2012; Exchange Control Administrative Freezing Actions; FIC section 42 restraint cases & section 36 read with Regulation 31 forfeiture cases.	Case reports	Insufficient human and technical resources for performing the assessment	FIC PG NAMPOL NAMRA BoN- Exchange Control Department	Ministerial/ institutional budgets	Annually

Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
Strategic Objective 4 - Conducting extensive anti-corruption education							
Specific Objective 4.1: Conduct anti-corruption, ethics and integrity training for personnel of public institutions							
4.1.1	Ensure participation of staff of OMAs, RCs and LAs at periodical training courses on ethics and integrity.	Number of staff trained	Evaluation questionnaires Reports Attendance register	Lack of cooperation by institutions Superficial involvement in training sessions	ACC OPM NIPAM OMAs ALAN ARC NALAO NAPWU	Limited to the budget approved for the institutions involved	Quarterly
4.1.2	Implement a training programme on ethics, integrity and anti-corruption for school teachers.	Number of training Number of teachers participating	Training material developed Reports Attendance register	Insufficient financial resources	MoEAC ACC NANTU	Limited to the budget approved for the institutions involved	Annually
Specific Objective 4.2: Increasing the degree of public awareness on the impact of corruption							
4.2.1	Organise periodical consultations and public debates for promoting the best anti-corruption practices within local and regional authorities and increasing citizens' confidence.	Number of public debates Number of participants	Agendas Annual reports Minutes Reports	Low level of participation and involvement by the public Budgetary constraints	ALAN ARC NALAO ACC	ALAN/ ARC budgets	Annually
4.2.2	Organise awareness sessions on corruption and ethics for the public to enhance general knowledge and understanding.	Number of participants; Number of awareness session conducted	Report Attendance register	Low level of participation and involvement by the public	ACC	ACC budget	Quarterly
4.2.3	Monitor delivery of the anti-corruption theme in the civic life skills subject in schools.	Number of schools monitored	Reports	Lack of cooperation	MoEAC (NIED) ACC	MoEC budget	Annually

4.2.4	Implementing civic education programmes for promoting ethics, integrity, openness and access to and protection of information through relevant educational media and the establishment of regional access centres.	Number of regional access centres established; Number of civic education programmes implemented	Reports	Insufficient resources	MICT	MICT budget	Quarterly
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Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
Strategic Objective 5 - Preventing corruption in the private sector							
Specific Objective 5.1: Supporting transparency and integrity in private enterprises							
5.1.1	Assist enterprises in the private sector in developing internal integrity systems compliance procedures and ethics codes. Further, integrate anti-corruption awareness.	<p>Number of private enterprises with internal integrity developed</p> <p>% of anti-corruption awareness integrated</p>	Annual Reports	<p>Lack of cooperation</p> <p>Insufficient resources</p>	<p>NCCI CIF NTF NIPDB SME Compete NEF</p> <p>NB: All the institutions would equally/ differently report on this action.</p>	<p>NCCI/ CIF / NTF/ NIPDB/ SME Compete/ NEF budgets</p>	Annually
5.1.2	Facilitate the enactment and oversee implementation of New Business Entity Bill. NB: The legislation would aid simplify bureaucratic procedures for service to private companies and Public Companies.	<p>% progress made on enactment and implementation of the Bill passed</p> <p>Number and type of services simplified</p>	<p>Legislation in place</p> <p>Public Service Charter/ or brochures reports</p>	<p>Lengthy period of passing laws</p> <p>Insufficient resources</p>	BIPA	BIPA budget	Annually
5.1.3	Ensuring that private and public companies, taking into account their structure and size, have sufficient internal auditing controls to help prevent and detect acts of corruption and that the accounts and required financial statements of such private enterprises are subject to appropriate auditing and certification procedures.	<p>Number of controls complied with</p> <p>Number of reports produced</p>	Reports	<p>Inadequate resources</p> <p>Time delays</p>	BIPA	BIPA budget	Annually

5.1.4	Promoting transparency among private entities, including where appropriate, measures regarding the identity of legal and natural persons involved in the establishment and management of corporate entities.	Number of promotional material developed Number of mechanisms developed	Promotional materials Reports	Lack of resources	BIPA	BIPA budget	Annually
5.1.5	Extractive industry bodies to adopt and implement specific anti-corruption and transparency policies and procedures.	Number of anti-corruption and transparency policies and procedures adopted and implemented	policies and procedures	No cooperation from industry representatives	Chambers of Mines MME	Chambers of Mines/ MME budgets	Annually

Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
Strategic Objective 6 - Engaging civil society, non-governmental organisations, and the media in combating corruption							
Specific Objective 6.1: Supporting transparency in civil society and non-governmental organisations							
6.1.1	Organising anti-corruption public dialogue, ethics training and corruption awareness at national, regional and local levels.	Number of public dialogue, ethics training and awareness conducted Number of participants	Reports Evaluation forms Attendance register	Low level of participation	NID IPPR ACC CIVIC +264 CCN APCN Regional Forums Legal Assistance Centre Hanns Seidel Foundation	CSOs budget	Annually
6.1.2	Continuously engage relevant CSOs to assist in research on anti-corruption issues.	Number of CSOs involved in research and anti-corruption issues; Number of research projects undertaken	Reports	No cooperation from CSOs representatives	IPPR NID CIVIC +264 NGOs Legal Assistance centre	IPPR/ CSOs budgets	Annually
6.1.3	Review existing legal and regulatory environment for civic organisations to provide a parallel complementary voluntary registration system for CSOs and simplify the formal registration of CSOs as provided for in the Civic Organisations Partnership Policy of 2005. This process needs to speed up NPC to bring all the CSOs on board for the Civic Organizations Partnership Policy of 2005 to be realised.	% increase in progress made towards review of existing legal and regulatory environment for civic organisations; Number of CSOs registered	Register Reports	Lack of cooperation from CSOs representatives	NPC CSOs NGOs CCN Faith-Based Organisations	NPC/ CSOs budgets	Annually

6.1.4	Encourage transparency initiatives through the development and implementation of comprehensive CSOs codes of conduct on ethics.	% progress made on the codes of conduct development and implementation Number of CSOs participating Number of codes of conduct adopted	CSOs documents	Lack of cooperation from CSOs representative	NPC MHSS NaCC CIVIC +264	NPC/ Ministerial/ institutional budgets	Annually
6.1.5	Enhance collaboration with the academic community on corruption issues (research and programmes).	Number of collaboration initiatives established	Reports	Academic community unwilling to participate	UNAM NUST IUM ACC Other tertiary institutions	Institutional budgets	Annually
6.1.6	Development of unaccredited and accredited anti-corruption training courses and delivery thereof, by institutions of higher learning.	% of anti-corruption training courses developed	Training course materials	Insufficient resources	UNAM NUST IUM NIPAM ACC and other tertiary institutions	UNAM/ institutional budgets	Annually
Specific Objective 6.2: Supporting the role of the media							
6.2.1	Continue to build and maintain an enabling environment for free media in line with the Namibian Constitution.	Number of media institutions Number of media reports on corruption	Reports	Lack of cooperation from media	MICT EFN	MICT budget	Annually
6.2.2	Conduct public education seminars on corruption for media houses and enhance partnership with media houses in the fight against corruption.	Number of seminars conducted Number of media houses participating	Seminar reports Evaluation forms	Media houses unwilling to participate	ACC EFN MICT	ACC budget	Annually

6.2.3	Conduct training for investigative journalists on anti-corruption related issues as a priority.	Number of training courses conducted Number of journalists trained	Reports Evaluation forms Attendance register	No cooperation from media	EFN MICT ACC NUST- Department of Communication UNAM- School of Humanities, Society and Development	EFN/ Institutional budgets	Annually
6.2.4	The Media Ombudsman to create awareness and popularise the office of the media ombudsman and the 'Self-Regulatory Code of Ethics and Conduct for Namibian Print, Broadcast and Online Media'. Also, sensitising the public about the fact it does not cover freelance and citizen journalism.	Number of awareness activities conducted Number of media institutions participating	Media documents Report	Lack of resources Lack of cooperation from media houses	Media Ombudsman EFN	Institutional budgets or external sourced funding	Annually

Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
Strategic Objective 7 - Preventing corruption and promoting accountability in the sports fraternity							
Specific Objective 7.1: Supporting transparency and integrity in sports							
7.1.1	Sports oversight bodies to adopt and implement specific anti-corruption and transparency policies and procedures in all sporting codes.	Number of transparency policies and procedures adopted and implemented	Policies and procedures	Lack of cooperation from sports fraternity representatives	NSC MSYNS	NSC/ MSYNS budgets	Annually
7.1.2	Promote systems of integrity through corruption awareness and ethics training for sports clubs, administration staff members in collaboration with anti-corruption affiliates.	Number of officials trained Number of sports club participating	Reports Evaluation forms	Lack of cooperation from sports clubs representatives	NSC MSYNS	NSC/ MSYNS budgets	Annually

Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
Strategic Objective 8 - Engagement and participation of youth in anti-corruption programmes							
Specific Objective 8.1: Enhance the understanding of youth about corruption, ethics and integrity							
8.1.1	Develop and implement a training programme on ethics, integrity and anti-corruption for youth leadership in all 14 regions.	Number of training programmes developed and implemented Number of participants	Training Material Attendance register Reports	Inadequate resources	MSYNS NYC NYS NANSO Youth Wings of Political Parties ACC RCs LAs	Institutional budgets	Annually
8.1.2	Conduct dialogue sessions on anti-corruption, good governance, ethics and integrity for youth.	Number of youth dialogues sessions held Number of participants	Attendance register Reports	Low level of participation and involvement by the youth	NYC NYS MSYNS NANSO Youth Wings of Political Parties ACC Anti-Corruption Education Consultancy CCN Scouts of Namibia	Institutional budgets	Annually

NB: All the institution would equally/ differently report on this action.

Action	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Time frame
9. Implementation and coordination							
9.1.1	Convene NACSC consisting of stakeholders	NACSC established and functioning	Register	No cooperation from stakeholders	NACSAP Secretariat ACC	ACC budget	Annually
9.1.2	Launch of the NACSAP and public introduction of the NACSC	Number of participants	Attendance register	No cooperation from stakeholders	NACSAP Secretariat ACC	ACC budget	Once-off
9.1.3	Induction workshop for members of NACSC	Number of participants	Attendance register	No cooperation from stakeholders	NACSAP Secretariat ACC	ACC budget	Once-off
9.1.4	Identification of a monitoring and evaluation expert or institution to develop and compile a monitoring and evaluation plan	Indicators and results identified	Expert engaged Monitoring and evaluation plan	No local expert found	NACSC	ACC budget	Once-off
9.1.5	NACSC meets twice yearly and submits an annual report on NACSAP implementation to OPM	Number of reports submitted	Reports	No cooperation from stakeholders	NACSC	ACC budget	Bi-annual
9.1.6	Convene Cluster meetings	Number of meetings/ participants	Minutes/reports	No cooperation from stakeholders	NACSC Secretariat Cluster members	ACC budget	Quarterly
9.1.7	Convene Strategy Regional Forums	Number of meetings/ participants	Minutes/ reports	No cooperation from stakeholders	NACSC Secretariat Regional Governors RCs	ACC/ Institutional budgets	Annually
9.1.8	Convene Parliamentary Committee meeting	NACSAP Annual Report submitted Meeting held/number of participants	Minutes/ reports	No cooperation from stakeholders	NACSC Secretariat Parliament	ACC budget	Annually

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National Anti-Corruption Strategy and Action Plan 2021-2025

'Nurturing synergy to promote an effective system of integrity, transparency, ethics and accountability in all sectors of society in Namibia'