

Annex 3: U4 In-country workshop reports 2020

REPORT

Improving efficiency and transparency Anti-corruption, procurement and budget tracking in the agriculture sector in Ghana PRESENIAL WORKSHOP

Best Western hotel, Accra, Ghana
19-21 February 2020

Facilitators

Saul Mullard (Senior Adviser, U4-CMI)

Inge Amundsen (Affiliated expert, U4-CMI)

Host

High Commission of Canada, Danida, UK Aid, GIZ.



Workshop opening by the Minister of Food and Agriculture, Owusu Afriyie Akoto

The workshop was requested and organised by the Canadian High Commission in Ghana, in partnership with Danida, UKAid and GIZ. The U4 Anti-Corruption Resource Centre facilitated the workshop.

Background

Ghana's agriculture sector is a key economic sector that employs over 50% of the working population, including a large proportion of the poorest and most vulnerable. In 2018, the sector contributed 19.7% to the gross domestic product (GDP) and about 30% of the country's foreign exchange earnings. Above all, Government of Ghana (GoG) has identified agriculture development as holding the key to national development through its new "Investing for Food and Jobs (2018-2021)" (IFJ) sector strategy under the Ministry of Food and Agriculture (MoFA).

In 2006, Ghana committed itself, under the Abuja Declaration on Fertilizer for an African Green Revolution to increase fertilizer use among farmers from 8kg/ha to 50 kg/ha by 2015. The Ghana Fertilizer Subsidy Program (GFSP) objectives were to: i) increase farmers' accessibility to inputs (fertilizer and seed); ii) help farmers increase their rate of application as a means of increasing crop productivity and production; and iii) improve incomes of farmers. However, since its beginning, the motivation for the FSP has frequently shifted from increasing productivity as an urgent response to price spikes to

providing a social safety net for the poor, to demonstrating the benefits of fertilizer to farmers. The Subsidy Program was intended as a temporary program, but it has instead become a perennial component of Ghana's agricultural budget.

In 2019, the Ghanaian Parliament expressed its concern that challenges linked to contracting, procurement and distribution of agricultural subsidies needed to be addressed to help free resources for the agriculture sector's development and growth. Civil society organisations also agree that changes are required to improve the efficiency of the subsidy system, for instance to avoid smuggling and leakages.

Goal/Purpose of the Workshop

The workshop aimed at bringing together the relevant key stakeholders, including public, private and civil society organizations of the agriculture sector, who reviewed the performance of Ghana's input subsidy program and made suggestions to improve transparency, efficiency and effectiveness.

The U4 workshop sought to increase awareness and understanding of the policy issues, help create a neutral platform for stakeholder dialoguing, and provide ideas and approaches to influence sector policy decision-making and implementation.

There were 3 workshop days in all. The first 2 days involved a meeting of mostly the local country stakeholders in the Planting for Food and Jobs program, including government agencies and civil society organizations and NGOs

and some donor partners working in the agricultural development space in Ghana. A third day was organized for development partners to gauge and solicit their thoughts and remedies to the issues confronting the Ghana Agricultural Subsidy program.

Workshop 19 February

Welcome Address

The Acting Director, Ghana Development Division, Corey Huntington at the Canadian High Commission standing in for the High Commissioner of Ghana welcomed everyone and expressed her excitement at the intended objectives of the workshop. While also welcoming the Minister and the Deputy Minister she expressed hope that the recommendations of the workshop will be adopted to impact the Agricultural Subsidy program and assure the success of the Planting for Food and Jobs program that also ties in with GAC's Modernizing Agriculture in Ghana (MAG) program.

Keynote Address

The Minister of Food and Agriculture as well as the Deputy Minister for Local Government and Rural Development attended the morning session of the opening. The Minister for MoFA reiterated the Government's resolve in strengthening the Agriculture sector to make it a stronger pillar in providing incomes for farmers and other value chain participants as well as assure food security for the country. He emphasized also on the intent to produce for export.

The Minister recapped the objectives of the Agricultural Subsidy program for mostly smallholder farmers in the Planting for Food and Jobs (PFJ), Planting for Export and Rural Development (PERD) and other allied programs. He explained the strategic catalytic roles these programs will play in boosting productivity to assure food security and increased incomes for farmers and the local industry and economy. He shared some successes of the program so far in the fact that food prices had reduced, though marginally and that some seasonal crops were still available in their traditional lean seasons.

The Minister thanked the sponsors, GAC, UK AID, GIZ etc. on the initiative for the workshop and expressed his interest in the recommendations and outcomes.

Managing Expectations

The U4 facilitators led the participants to state their expectations of the workshop.

Some workshop expectations/outcomes of participants included:

- Finding out what can be done to curb and improve the issues associated with the Agricultural Subsidy (AS) program especially the distribution of agricultural inputs
- Identifying the bottlenecks in the AS distribution
- Share/gather ideas on how to build evidence and data on corruption in the AS system in order to fight it

- Share ideas to help Ghana improve on the AS system, address nuances and vulnerabilities in the system.
- Find ways of reducing the leakages in the AS system
- Share ideas on strengthening accountability in the AS system
- Identify the places of corruption in the agric sector (MOFA).

Panel Discussion

A panel made up of representatives from AGRA, MoFA, CDA and the Peasant Farmers Association shared their thoughts and experiences on “What the problems in the PFJ are and how to address them?” The panel members addressed the workshop and took answered questions at the end. Find notes on submissions made below:

Peasant Farmers Association:

Small Holder Farmers (SHF) are not getting full benefits:

- Fertilizers arrive late – distorts the farming cycle
- Farmers still find the subsidized prizes of inputs (fertilizers and planting seeds) too high to afford
- There are significant levels of corruption at the local/district/community level
- There was more difficulty for farmers to access subsidy coupons between 2009 – 2017
- Very low Agric Extension Agent (AEA) to farmer ratio
- Too much bureaucracy in accessing the subsidy coupons
- Existence of smuggling of the fertilizers and seeds
- Only 15 bags are allowed per farmer but some are able to acquire

truck loads and smuggle to neighbouring countries for sale

- Chiefs intervene in the smuggling ring and condone it
- The requirement from farmers to be on the subsidy scheme is a voter’s ID. Some people are able to acquire lots of voter’s ID and collect large quantities that are smuggled
- At the district level dealers create artificial shortage and sell after the season on the open market
- There needs to be more clarity on the subsidy pricing

Community Development Alliance (CDA):

The CDA shared their experiences on a research on the subsidy process for Sissala West and Lambusie Districts as below:

- Smuggling is widespread – done by top influential people and the farmers themselves
 - Powerful players smuggle in trucks
 - Farmers smuggle in donkey carts
- The Regional Coordinating Council and Bureau of National Investigation (BNI) track the syndicates but fail to follow through with arrests or sanctions etc.
- The data of beneficiaries of the subsidy scheme does not match distribution made. Actual quantities distributed are far lower than recorded numbers.
- Some input dealers supply low quality inputs (seeds and fertilizers)

Alliance for Green Revolution Africa (AGRA):

AGRA agreed to most of the points discussed previously but made a key observation:

- Subsidies distributed were not targeted – same fertilizers are supplied for different crops and geo-ecological zones

Ministry of Food and Agriculture (MoFA):

- Frequent changes in the modalities for the subsidy program ends up confusing the farmers
- The regulatory regime to check all the corruption issues is very weak. More needs to be done
- Seed/fertilizer quality – some dealers take advantage of the laxity in the system and supply cheap, low quality goods
- Some input dealers buy subsidized fertilizer and resell when there are shortages on the scheme

Question and Answer Session

The facilitators led the participants on a Q&A, posing 2 guiding questions/statements. What are the issues of transparency? Is there adequate data on farmers?

Answers/ General suggestions:

- Data – E-registration of farmers currently going on by MoFA but the data needs to be validated
- Operational difficulties hampering the e-registration process and validation.
- CHC noted that, lack of warehousing to properly store the inputs poses a challenge to preserving the quality of the inputs as well as the distribution process.

- Agric Extension Agents should be tasked to collect the data rather than an external independent body. This will cut costs.
- Improve on interagency coordination to curb corruption – police, BNI etc.
- Improvement in transparency of budget determination needed – increases credibility
- Too much power in the hands of the politicians – the power should rather go to the technocrats.

Public Procurements and Contracting

The workshop facilitators did a presentation on best practice procurement and contracting processes giving examples from some countries where successes were chalked as well as failed programs.

Public Procurement in Ghana and the Law

Participants were broken into heterogeneous groups represented by the different sections – Government, CSO, Donor etc. Participants were asked to brainstorm and present on the Risks/Challenges and Recommendations for better practices on the procurement issues associated with the Agricultural Subsidy process.

Presentations by Groups:

Key Problems/Challenges:

- Incorrect data of farmers
- No collaboration and coordination among key actors.
- Smuggling of subsidy inputs
- Non-enforcement of processes in subsidy system

- Non-empowered beneficiaries to take control of processes
- No political will to curb corruption
- Nonexistent monitoring regime
- No specific targeting of incentives to diversity in farming/farmers
- Low quality of inputs (seeds and fertilizers)
- Lack of political will
- Complicity of government/party functionaries (foot soldiers etc.)

The main Challenge:

- Incorrect data on farmers
- Non targeting of farmers

Recommendations:

- Conduct a farmer census – Use of AEAs to fill the gaps
- IT e-registration with tangible data
- Web based registry that can be updated by MIS officers

What to achieve:

- Acquire comprehensive farmer data – name, age, farm size, crops, farm location/size etc.
- Gives a better idea of which farmer plants which crop etc.
- Assists effective targeting of farmers – crops, soil types, size of farm
- Improves program planning and implementation – targeting, M&E, corrective actions
- Reduces smuggling and other leakages because each input can be traced to a known farmer
- Improves resource allocation and utilization (cost efficiency)
- Maximizes yield/production

Key Actors:

- MoFA

- Departments of Agriculture (Agric Extension Agents, PPMED, CD, SRID, DAES)
- Ministries, Municipal and District Agencies (MMDA)
- District Assemblies
- Farmers

Partners:

- CSOs/NGOs in Agric
- Development Partners
- Private Sector
- Traditional Authorities
- Security Operatives

Detractors:

- Input Dealers
- Some Farmers
- Some Politicians
- Some MoFA Officials
- Some community leaders
- Rich farmers
- Businesspeople

Addressing the Challenges:

Targeting the input dealers and businesspeople:

- Checking against provision of false information and falsifying data that can be manipulated to their benefit
- Possible conflicts of interest
- Influence bribery.

Actions to be taken

- Enhance supervision/monitoring
- Increased awareness creation amongst farmers
- Adequate remuneration for data collectors so as not to compromise the information
- Deploying social accountability tools to empower farmers

- Application of severe sanctions if found out

Targeting Farmers:

- Controlling apathy that sets in and the misinformation:

Actions to be taken

- Awareness creation (sensitization)
- Community mobilization to support drive

Targeting Politicians:

- Minimizing the use of political influence
- Misinformation

Actions to be taken

- Public Sensitization – social accountability
- Community mobilization to support drive

Targeting MoFA Officials

- Discouraging falsification of data to suit their practices
- Deliberately frustrating the system for their private gains

Actions to be taken

- Severe sanctions against culpable officers
- Capacity building on the use of the digital tools

General Recommendations:

- Establish a comprehensive database of farmers – gender, age, level of revenue, disabilities etc. – information on who plants what and where
- Apply remote sensing technology and geo-targeting

- Promote interconnectivity of farmer census with other data bases (GHS data)
- Use registry in targeting farmers who need specific assistance – inputs (type/quantity – seeds, fertilizer etc.) and extension services
- Sensitization on purpose of farmer registry – MMDAs, AEAs, farmers, input dealers, etc.
- Resources to be made available for compilation of registry – AEAs, NABCO, YEAs, NSS
- Citizens' evaluation of performance and quality of inputs from input suppliers.
- Improve collaboration and cooperation amongst actors/partners
- Intensify public sensitizations
- Apply a sanction regime and follow through always
- Improve on policies to efficiently run the subsidy scheme and guard the funding as well as collaboration and coordination – Task Team.

Workshop 20 February

Strengths and Weaknesses of the Procurement System in Ghana

Participants were broken out into mixed groups represented by various sections – Government, CSO, Donor etc. The groups did a SWOT analysis of the current Agric Subsidy program and its associated procurement processes. The aggregate presentations are captured below:

Strengths:

- Amendments to the Procurement Act 914 has strengthened the law.

- Existence of a Procurement Regulations document currently being developed in the draft stage.
- There are checks and balances in the Procurement Act
- The default procurement method is Competitive Bidding.
- Mixed expertise constitute the PPA tender committee – the diversity is helpful
- The current PPA website in process of becoming Open Contracting Data Standard (OCDS) compliant.
- The current procurement system is backed by law.
- Thresholds exist in the law for different categories of officers?
- Existence of a well-structured decentralized system.
- Presence of Whistle Blower's Act to expose suspected corrupt practices.
- Right to Information Act promotes inquisition/transparency
- Weaknesses:
- Public Procurement Authority's (PPA) involvement in sole source procurement methods undermines its regulatory functions.
- Self-interests of top influential people exist
- Abuse of sole source methods in selection of vendors for inputs supply
- PPA staff seem not to be independent of decisions they should be taking
- No procurement tender adverts on PPA website – defeats fair competitive bidding
- Composition of PPA Board not always based on technical merit.

- Majority of the PPA's tender committee are appointed by the head of the PPA.
- "Pouring of libation" (offer of gift) to facilitate the convening of the tender committee sitting
- Tender committee has capacity gaps
- Lack of enforcement of compliance to statutes
- Long prosecution time of offenders

Opportunities:

- Global best practices exist
- Governments' commitment to implement e-procurement – could reduce incidence of corruption to a large extent.
- Office of Special Prosecutor (OSP) to investigate procurement related corruption cases.
- Presence of external check on the system - Auditor General's commitment to audit and expose malfeasance, Public Interest and Accountability Committee (PIAC), OSP, CSOs, Media, Inter-ministerial Monitoring Platform
- Independent citizenry monitoring.
- Influence Election/political manifestos
- Build upon existing legal framework

Threats:

- Irregular procurement audits
- Cumbersome bureaucracy in the subsidy system
- Government (election changes) hire and fire – disrupts continuity
- Crisis procurements which are sometimes faked to trigger sole sourcing procurements methods.

- PPA headed by a government appointee – answers only to government
- Ultimate decisions taken by a political head
- Abuse of sole sourcing procurement methods
- Too much power in elected officials to influence the system
- Inadequate allocations to stakeholders in legal framework
- Value for money – resale of contracts awarded to 3rd parties.

Civil Society and Social Accountability

The role of Civil Society in influencing the Agric Subsidy process was discussed as a follow up to a presentation by SEND, Ghana on their experiences with budgeting in Ghana.

SEND GHANA's Experience:

Primary Objectives:

- Ascertain progress, challenges and opportunities for improving the quality and quantity of public spending in the Agric sector.
- Generate the evidence required to effectively engage with policy makers and implementers to influence the sector's budget.
- Determine if government is prioritizing citizens' needs in its spending.
- Assess impact of budget on the lives of farmers
- Mobilize public opinion to increase the pressure for greater equity in budget allocations.

What SEND Ghana does:

- Make input into national Budget from district level information collected.
- Use budget tracking tools (community score cards etc.), to track budget use on the ground
- Keeping the eye on money.

Lessons Learnt:

- Many MMDAs do not prioritize Agriculture
- Evidence is powerful to influence Budget
- ICT has a good multiplier effect
- Partnerships are helpful

Workshop Recommendations

Facilitators led participants through a discussion session towards the end of two days of deliberation to summarize the thoughts on the way forward for all stakeholders and the structures that exist.

Low Hanging Fruits:

- Proper Registration of farmers
 - E-registry – technicians to do the registration must understand the rationale/process.
- Data to collect:
 - Depends on use – web-based?
 - Name, gender, age, farm size, location, crops
 - Accessibility – District MoFA Officers
- Resistance to Corruption
 - CSOs, farmers to champion
 - Naming and shaming corrupt officials to act as disincentive for others

- Choice of propositional than confrontational actions
- Use statistics to support claim
- Create a win-win situation
- Constructive cooperation
- Blanket distribution/use of inputs (fertilizer, seeds) must cease
 - Supply the right types/quantities of fertilizers to different ecological/geographic zones
 - Reducing cost of subsidy and developing an exit strategy
 - AEAs to use demos to show proper use of inputs
 - Promote organic fertilizers
- Procurements
 - Timeliness of delivery of inputs to farmers needed
 - Check for quality and quantity
 - Distribution audits to be strengthened
 - Procurement Audits to be strengthened
- Establish a robust M&E regime

Workshop 21 February

Day 3 was a meeting of mainly the Development Partners (DP) who have been associated with the Agricultural development process in Ghana.

3.1 Recap of first 2 days

The day started with a recap of proceedings over the first 2 days of meetings with the cross section of actors in Agriculture.

The DPs then shared how their various outfits were resisting exploitation of the

resources they donated for the development of agriculture in Ghana. Below are notes on some of the discussions captured.

There was a general call to monitor supply chain activities especially of the companies that were supplying agricultural inputs and encourage bulk transport.

The DPs lamented the resistance in MoFA for monitoring of the processes. There was a general call to assist Government to strengthen development policies against corruption.

Each set of DPs gave a presentation on their internal efforts at checking the wastage and potential corruption that may arise as they resource the Agriculture processes. See below notes on discussion.

Who is doing what – Presentation of individual agency anti-corruption project portfolios

GIZ:

Has internal mechanisms in place to reduce incidence of corruption from their side but conceded their weakness on influencing government policy. GIZ however does the following:

- Periodic surveying of processes that they are involved in
- Conducts spot checks
- Work with accountability committees at the district level
- Assist Government to roll out recommendations of the public accounts committee.

IFAD

- Existence of system for preventive audits
- Existence of systems/tracking modalities for procurement processes – limitations however exist
- Post reviews through auditing – using Government audit
- Existence of safeguards for prevention of abuse are followed through
- Assessments done at project design
- Procurement methods in place
- Internal audits – whistleblowing encouraged.

JICA

- All procurements for goods and services to be donated are done by JICA for MoFA.

Denmark Embassy

- All donations are guided by Danish Audit.

EU

- Strict project approvals
- Have internal controls
- Indirect management - rely on external partners with control

DFID

Works with the Ghana mandated bodies and other organizations to check/resist corruption

- Use the EOCO, CID, Judiciary to investigate/track allegations of corruption
- Sponsor/support corruption watch – program on TV
- Sponsor/support STAR Ghana – works on accountability side

- Influence manifestos of political parties to show commitment to fighting corruption
- Ghana oil and Gas – accountability PIAC – to track oil funds
- Support GRA – working to strengthen anti-corruption
- Support the Auditor General to strengthen anti-corruption
- Support Investigative Journalism – strengthening capacity
- Follow election campaign financing
- Study the situations at the Tema ports

AGRA

- Presence of a rigorous M&E System
- Internal audit (check if money is used for what meant for).

USAID

- Presence of internal controls
- Existence of internal and External controls
- Existence of a good electronic system to monitor
- Supported the formulation of the Right to Information law
- Support investigative journalism

Canada

- Strong team of technical advisors support the process
- Canadian auditors exist
- Work with the Ghana Auditor General
- No specific anti-corruption program
- Making sure funds are not staying in Accra but getting to the districts.

In wrapping up on the meeting, the facilitators suggested that after the workshop next actions on the

philosophy of “The Stress Test – Turning Up the Heat” as an invigoration of their efforts against corruption in the Agric subsidy system. The following were the closing suggested commitments for all:

- A DP or couple of DPs should champion/lead/coordinate the anti-corruption efforts – the US?
- There should be inter-Donor Coordination against corruption
- Monthly DP meetings should be instituted with the fight against corruption on agenda
- Improve the DP Agric working group – development of a coordinating structure
- Glare - co-chaired by MOFA – info sharing
- Suggestion for an anticorruption working group under the Governance Portfolios.

Major Workshop Conclusions

A few actions were identified as the spine on which all other processes can ride on and reduce the motivation or prevent the wilful manipulation of the system for personal resource gains.

- Promote the e-registration of farmers with all bio and physical data – comprehensive farmer registry. This singular act will allow other processes fall into place.
- DPs to intensify inter-agency working group to address their joint approach.

Annex 1: Agenda

DAY ONE Wednesday 19 February 2020

Official Opening Sessions

Session open to a maximum of 80 participants

8:30 – 9:00	Registration	
9:00 – 9:30	Welcome and Opening <ul style="list-style-type: none"> • Welcome by host • Opening by U4 	High Comm. of Canada U4
09:30 – 10:00	Keynote <ul style="list-style-type: none"> • Progress made in the agriculture sector and vision for the future of the sector in Ghana 	Minister of Agriculture
10:00 – 10:30	Group Picture and Coffee Break	
10:30 – 11:00	Session 1: Corruption and Anti-Corruption <ul style="list-style-type: none"> • Corruption: actors, levels, forms • Global overview and recent trends 	Inge Amundsen
11:00 – 12:00	Session 2: Agriculture Subsidies in Ghana <ul style="list-style-type: none"> • The evolution of the public subsidy system • Challenges in the public subsidy system • Q&A 	Kofi Takyi Asante
12:00	Lunch	

Working Sessions

Open to a maximum of 35 invited workshop participants only

13:00 – 13:30	Introductions <ul style="list-style-type: none"> • Introduction to U4 and the agenda • Brief introduction of participants 	U4 Participants
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13:30 – 14:30	Session 3: <i>Panel Discussion: The Agriculture Subsidies in Ghana</i> <ul style="list-style-type: none"> Peasant Farmers Association of Ghana, Omnifet (tbc), SEND Ghana, Director of Agriculture Savelugu district, AGRA 	
14:30 – 15:00	Coffee break	
15:00 – 16:00	Session 4: Public Procurement and Contracting <ul style="list-style-type: none"> Procurement and corruption Public procurement in Ghana 	Inge Amundsen Kofi Takyi Asante
16:00 – 17:00	Session 5: <i>Group Work: Public Procurement</i> <ul style="list-style-type: none"> Short introduction to group work Identify risks in Ghana's procurement system Reporting back from groups 	Saul Mullard Working groups U4 moderation
17:00	End of day one	

DAY TWO Thursday 20 February 2020

Working Sessions

Open to a maximum of 35 invited workshop participants only

09:00 – 09:15	Practicalities and Warm-Up	U4 moderation
09:15 – 10:30	Session 6: Decentralised Oversight & Monitoring <ul style="list-style-type: none"> Oversight and monitoring methods, principles and experiences The role of civil society Lessons learned: <ul style="list-style-type: none"> Expenditure Tracking Examples from Ghana 	Saul Mullard SEND Ghana (tbc)
10:30 – 11:00	Coffee Break	
11:00 – 12:30	Session 7: <i>Group Work: Decentralised Oversight & Monitoring</i>	

	<ul style="list-style-type: none"> • Short introduction to group work • Identify actors and inroads • Make recommendations 	Saul Mullard Working groups
12:30 – 13:30	Lunch	
13:30 – 14:30	Session 8: Reporting Back (<i>Plenary</i>) <ul style="list-style-type: none"> • Present findings and recommendations • Discuss and agree on recommendations 	U4 moderation Working groups
14:30 – 15:00	Coffee Break and Workshop Evaluation	
15:00 – 16:00	Session 9: <i>Panel discussion: From recommendations to action</i> <ul style="list-style-type: none"> • Director of Crop Services MoFA (tbc), Chamber of Agri-Business, Chemico, STAR Ghana, Director of Agriculture Eastern Region, IFPRI 	
16:00 – 16:30	Closing Statements and Certificates	U4 moderation
16:30	Closure of workshop	

DAY THREE Friday 21 February 2020

Workshop add-on:

Donors Collective Responses to Corruption in Ghana

Donor agencies only

9:00 – 9:30 am	Welcome and Opening <ul style="list-style-type: none"> • Welcome by host: Canadian High Commission • Opening by U4 facilitators • Brief introductions by participants 	Marie-Claude Harvey Inge Amundsen Saul Mullard Participants
9:30 – 11:00 am	Session 1: ‘The Stress Test’ <ul style="list-style-type: none"> • Presentation of individual agency AC policies • Presentation of current donor coordination • Some principles for collective responses 	Participants Inge Amundsen

	<ul style="list-style-type: none"> • What to do as the 'chicken scenario' develops into a full-blown massive political corruption scandal • Roundtable discussion 	
11:00 – 11:30 am	Coffee break	
11:30 – 12:30 am	Session 2: Approaching the agriculture sector <ul style="list-style-type: none"> • To develop collective responses to the corruption challenges in Ghana in general • Develop answers to the specific challenges in the agriculture sector • Who does what, sharing responsibilities • Plenary discussion 	U4 moderation
12:30 – 13:00 pm	Session 3: Wrap up: next steps in donor coordination	U4 moderation
13:00 pm	Lunch	

Annex 2: Feedback from participants

A survey was conducted after the workshop, and the questions-answers were as follows:

Strongly disagree : 0 %

Disagree : 6 %

Agree : 56 %

Strongly agree : 39 %

In general, how satisfied are you with the course/workshop

Not satisfied : 0 %

Partly satisfied : 0 %

Satisfied : 56 %

Highly satisfied : 39 %

Do you expect to use the knowledge gained in your work?

Yes : 100 %

No : 0 %

Don't know : 0 %

Do you agree that the composition of participants was good? (workplace, sectors, positions, gender, socio-economic background, etc.)

REPORT

Nurturing success, monitoring outcomes: The way ahead in supporting Zimbabwe's National Anti-corruption Strategy (NACS)

VIRTUAL WORKSHOP

17-18 November 2020

Facilitators	Aled Williams, Monica Kirya (Senior Advisers, U4-CMI)
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Host	German Development Cooperation in Zimbabwe
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Introduction

In conjunction with German Development Cooperation in Harare, Zimbabwe, U4 hosted an online workshop on the implementation of the Zimbabwe National Anti-Corruption Strategy (NACS) 2020-2024. Participants included U4 partners, Zimbabwe Anti-Corruption Commission (ZACC) Commissioners and Staff, judicial officers, Transparency International Zimbabwe, PACT, University of Zimbabwe and Rhodes University. The objectives of the workshop were:

- To review lessons and examples of measures to support national-level anti-corruption strategies from other contexts of relevance to Zimbabwe;
- To take a retrospective look at past national anti-corruption efforts in Zimbabwe;
- To review joint monitoring methodologies for tracking progress on Zimbabwe's new national anti-corruption strategy;
- To facilitate partnerships to improve the feasibility of anti-corruption impacts via operationalization of Zimbabwe's new national anti-corruption strategy.

DAY ONE

The day began with introductions and expectations, formal welcoming remarks from the German Development Cooperation and U4, and a brief explanation on various features of the Zoom meeting platform and online workshop etiquette.

In the first session, Aled Williams made a presentation entitled: “What makes anti-corruption successful? Common patterns and case examples” based on a [recent U4 paper](#). The presentation highlighted that although evidence shows anti-corruption goals are challenging to achieve, national and subnational success cases do exist. Pathways for anti-corruption success were noted, with two case examples provided: (i) community report cards in Kenya and (ii) anti-corruption prosecutions in Indonesia. The session was followed by a plenary Q&A that clarified issues that had arisen from the presentation.

The second session provided an in-depth look at the NACS from three perspectives:

- i) A perspective from government from ZACC Commissioner Makamure, who gave a presentation of key parameters, sectors, implementation measures, actors and review mechanisms;
- ii) A civil society perspective, from Transparency International Zimbabwe’s Executive Director, Ms. Muchaneta Mundopa;
- iii) Mr. Xolani Zitha from GIZ provided a donor perspective on the strategy.

In his presentation, Commissioner Makamure reported that ZACC has established a multi-stakeholder Steering Committee to guide implementation of the strategy. Sectoral sub-committees have also been appointed to look at issues in the various sectors that are priorities in the strategy. Meetings of the sub-committees have already started and will continue into 2021. The Steering Committee and sub-committees consider what needs to be done to operationalize the plan in all concerned ministries, departments and agencies.

Transparency International’s Muchaneta Mundopa outlined the key priority issues from a CSO perspective for the NACS. They include: ensuring national ownership of the strategy from all actors and sectors; ensuring the autonomy of anti-corruption agencies; implementing periodic monitoring and evaluation of anti-corruption initiatives; respecting the fundamental rights to freedom of speech and freedom of association to enable civil society to play its watchdog role; effective coordination of stakeholders and ensuring sufficient technical and financial resources to implement the NACS.

On behalf of U4 Partners in Zimbabwe, Mr. Xolani covered three priorities:

i.Improving public trust in ZACC as an institution

The ultimate test facing ZACC is to win public confidence in its efforts in the fight against corruption. To do so, ZACC needs to set realistic goals, follow-up on their implementation and show proof to the public that anti-corruption efforts are producing results. In minds of most Zimbabweans, this means seeing an increase in convictions of individuals and entities charged with corruption. This is the ultimate test that ZACC has to pass in order to win public trust. Indeed, there are other processes

that precede increased conviction rates such as solid public engagement focused at getting members of the public to become “allies” of the Commission. For as long as citizens perceive that providing evidence of corruption to the Commission translates into concrete action being taken against those found committing acts of corruption, citizens will see value in collaborating with ZACC in fighting corruption. As long as the perception that those involved in corruption face no consequences and receive favourable treatment by institutions fighting corruption, then public trust in ZACC can be expected to be very low. Trust in public institutions is strongly correlated with citizens seeing the difference and value rendered by an institution. Where a lot of talk and intentions are seen to be dissociated with outcomes related to the anti-corruption mandate then we can expect widening disengagement and mistrust in any institution dealing with anti-corruption. There are many elements that contribute towards improving citizen trust in an institution like ZACC, the core element has to do with a results-oriented public engagement.

ii. Communication of ZACC’s Strategic Work

Closely linked to public engagement is the need for purposive and pro-active communication. The NACS needs to rest on a solid foundation of effective communication with citizens and stakeholders. ZACC has to be efficient at documenting and communicating the results of its work to its stakeholders. There may be many achievements made thus far, unless these are communicated with proof to citizens and stakeholders, public perceptions will not be swayed in ZACCs favour.

iii. Strategic funding

The GoZ needs to take the lead in funding the NACS implementation that is coherent and clearly mandated, it has to be owned by government and can be supported by stakeholders. NACS cannot be a donor driven process. Yes, there are many grounds for development [partners to support e.g. technical advisory work, technology support, however the ideal scenario is one where development partner support primarily focuses on technical assistance and support and does not exceed what GoZ commits towards the fight against corruption. This is strongly linked to the situation in the economy, if unmotivated public servants are all there is to lead implementation of the strategy, there is no need to guess about what the effects of this situation will be on combating corruption.

The next session was devoted to group work. Participants were divided into two multi-stakeholder breakout groups where they shared experiences on the most important current anti-corruption issues facing Zimbabwe. The group discussions elicited the following issues as some of the main ones that should be prioritized in the NACS:

- Money-laundering;
- Trade misinvoicing;
- Matching the political rhetoric on corruption with actions;
- Promoting transparency in extractives;
- Promoting citizen engagement and civic space;
- Involving the informal sector in anti-corruption initiatives;
- Passing and implementing a whistleblower protection law;
- Asset recovery;
- Reforming the judicial system to avoid a back-log of corruption cases and ensure all cases are prosecuted to their conclusion;
- Improving cooperation and coordination among anti-corruption agencies such as ZACC and the Prosecution Service.

The last session of Day One provided a retrospective look at corruption, illicit financial flows and anti-corruption efforts in Zimbabwe, based on one presentation from Rhodes University/University of Zimbabwe and one presentation from PACT.

A Rhodes University and University of Zimbabwe Research Team was commissioned by U4 to conduct a study to inform the workshop. Dr. Manase Kudzai summarized the study, focusing on past anti-corruption efforts in Zimbabwe and issues that remain to be tackled. Dr. Kudzai observed that Zimbabwe has a fairly comprehensive legal framework for tackling corruption and has established several agencies to tackle it. These include the Zimbabwe Anti-Corruption Commission (ZACC) as well as several others such as the Office of the Comptroller and Auditor General, the Financial Intelligence Unit, the Procurement Regulatory Authority and the Anti-Monopolies and Anti-Corruption Department. Despite the existing laws and various agencies, however, Zimbabwe is beset by corruption for several reasons: the role of politics and grand corruption; the politicization of anti-corruption efforts and lack of political will to address corruption; lack of clarity on the roles and responsibilities of the various institutions established to tackle corruption; the fact that ZACC does not have powers of prosecution and the related poor record of prosecution of corruption cases by the Prosecution Authority; lack of funding for anti-corruption institutions due to Zimbabwe's economic situation; a culture of corruption in which corruption has been normalized, and the limited involvement and participation of citizens in anti-corruption initiatives.

The Rhodes University/University of Zimbabwe team recommended the following measures to address some of these problems:

- Respect constitutional provisions that speak to the independence of Commissions including the Chapter 13 Commissions (such as the ZACC);

- Develop a public process of appointing the ZACC chair and commissioners, including with the involvement of parliament, and introduce checks and balances in the process to ensure transparency and inhibit the possibility of manipulation;
- Ensure effective implementation and monitoring of the National Anti-Corruption Strategy through adhering to the Implementation Framework and Monitoring and Evaluation Strategies;
- Expedite the Anti-Corruption Bill into law and implement key provisions on whistle blower protection and the provision for ZACC to retain 15% from recovered assets for its capacitation. In the same vein, set up mechanisms within ZACC that will ensure that the recovered funds are not prone to corruption;
- Dissolve the Anti-Corruption Unit in the president's office and redirect its resources to increase the capacity of anti-corruption agencies such as ZACC and NPA in terms of funding, resources, internal systems and staff;
- Provide for a case management and monitoring system that ensures investigations and prosecutions to guard against the 'catch and release' system where arrests are done but not prosecutions;
- Place greater emphasis on prevention and public education through for instance mainstreaming anti-corruption in school curricular and Public Service Commission trainings.

Norman Mukwakwami and Thembile Phute of PACT provided a presentation on illicit financial flows in Zimbabwe, and what do about them, based on their previous studies. They focused on two issues in Zimbabwe: trade misinvoicing and corrupt procurement.

Trade-based money laundering is where proceeds of crime are kept offshore, facilitating tax evasion. It can be driven by companies evading capital controls, seeking to hold on to foreign currency, and is sometimes used as a means to pay kickbacks for corruptly won tenders. The problem is enabled by complex and opaque pricing (for example for tobacco and chrome), limited GoZ capacity to monitor trade, and an exploitable regulatory system. Trade misinvoicing affects high-value Zimbabwean exports. A presidential amnesty in 2018 found USD 237 million export receipts kept offshore, with the majority from the mining sector; Kwaramba et al (2016) show USD 9.1 billion was lost due to mis-invoicing in the mining sector from 2002 to 2012; and tobacco exports are shown to be routed through South Africa to facilitate trade misinvoicing. PACT provided a number of recommendations for how ZACC and the GoZ could address trade misinvoicing:

- Conduct special investigations on trade misinvoicing;
- Build on MoUs with other countries to tackle trade misinvoicing in bilateral trade;

- Strengthen trade data collection and management by ZimStat to allow GOZ, media, civil society and citizens to scrutinize trade practices;
- Deepen implementation of recent Transfer Pricing guidelines produced by ZIMRA;
- Make the FIU independent and autonomous, in line with best practice;
- Implement a transparency initiative for the mining sector e.g. EITI
- Improve the availability of foreign currency and the ease of repatriating capital and profits.

PACT noted that corrupt procurement in Zimbabwe is driven by institutional weaknesses, a lack of transparency, and impunity. It is enabled by key weak points including: a lack of due diligence in registering suppliers by PRAZ; discretion enjoyed by a few GOZ officials including Permanent Secretaries; limited capacity at small GOZ institutions e.g. rural clinics; and a corruptible quality assurance process. Corrupt procurement is common across many sectors where government plays a significant role (e.g. health, transport, energy) and manifests itself in allegations of over-pricing, the awarding contracts to losers of bids or to those who did not bid, payments for goods that are not delivered, or the awarding contracts to friends, relatives, associates and companies of decision-makers. PACT provided a number of recommendations on what can be done by ZACC and GoZ about corrupt procurement:

- Establish a transparent e-procurement system required by the Public Procurement and Disposal of Public Assets Act (PPDPA);
- Cancel or re-tender the large public contracts that were awarded without following due process in public procurement;
- Publish notifications of contract awards on PRAZ's website in line with the law
- Strengthen use of programme based budget for monitoring and evaluating public expenditure.

The session ended with a Q&A focused on clarifying aspects of the presentation.

DAY TWO

Following a formal welcome from the German Development Cooperation and a repetition of technical instructions from U4, the focus of day two was operationalizing the NACS.

During the first session, Aled Williams made a presentation on monitoring, evaluation and learning methodologies for national anti-corruption strategies. He highlighted common MEL issues, such as the lack of baseline data, the importance of promoting empirical rigor

and analytic reliability, and strategies and tactics for sharing anti-corruption learning and successes. Key messages were:

- When evaluating anti-corruption strategies, a mixed methods approach involving both qualitative and quantitative methods of data collection is important;
- It is crucial to lay the groundwork for good MEL by ensuring that activities are properly sequenced and that the results chain and theory of change are well thought-out, with assumptions made clear and indicators specific, time-bound and measurable;
- A cautionary note is that the results of anti-corruption efforts can potentially enhance dissatisfaction among citizens in government. A recent [SOAS/University of Birmingham](#) study provides an example from Nigeria of the unintended effects of anti-corruption messaging. How anti-corruption interventions, and specifically the results noted via MEL frameworks, are communicated is therefore very important. The focus should not just be on statistics, but on telling positive stories that illustrate what is being done both to bring culprits to justice and build integrity in government.

The next session, "Operationalising the NACS: Priorities," was led by the Chair of ZACC, Honourable Justice Loyce Matanda-Moyo. She shared ZACC's priorities for operationalizing the NACS. They include the following:

- ***Cooperation and coordination with other institutions*** such as the Zimbabwe Republic Police, Zimbabwe Revenue Authority, Transparency International and the national Parliament. ZACC has signed a number of MoUs with several of these agencies, for instance, with Transparency International, which is collaborating with ZACC on the whistleblower protection law. ZACC also has a long-standing relationship with the Prosecution Authority, since it does not have powers of prosecution but can only investigate corruption cases and then pass them on for prosecution.

ZACC would like to strengthen on-going collaboration with the Office of the Comptroller and Auditor General to analyze the data surrounding complex corruption cases. Joint training with the Financial Intelligence Unit on how to conduct financial investigations is under way. In addition, ZACC has signed an MoU with the Immigration Department concerning the entry and departure of suspects and convicted criminals involved in corruption-related crime, and with the University of Zimbabwe on research and knowledge generation on anti-corruption and integrity.

- **Improving the Anti-Corruption Courts**, especially in regard to reducing the anti-corruption case backlog and ensuring that cases are completed.
- **Developing modules on integrity for public servants**, in order to promote the preventative side of anti-corruption (in conjunction with GIZ).
- **Building the capacity of the NACS Steering committee and sectoral subcommittees** to understand and address various corruption-related problems within their mandates.
- **Public education campaigns** and other anti-corruption and integrity fora such as workshops and seminars.

Following Justice Matanda-Moyo's presentation, participants broke into two groups to discuss in more detail the NACS strategic objectives and how they should be prioritized for operationalization.

Group 1 identified the following issues for prioritization in operationalizing the NACS:

- Improving attention to gender, especially including the voices and perspectives of grassroots women on corruption-related issues;
- Conducting sector-specific corruption vulnerability assessments and promote public sector anti-corruption policies for each agency;
- Strengthening social accountability measures, especially public expenditure monitoring;
- Implementing an e-procurement system;
- Lobbying for beneficial ownership transparency of private corporations and not just beneficial ownership disclosure;
- Promoting access to information on state projects, including those of strategic importance, taking into account national security concerns;
- Promoting compliance with public financial management laws and ensuring that these laws are aligned with the Constitution;
- Build the capacity of parliamentarians on the Constitution and anti-corruption law.

Group 2 highlighted the following issues for prioritization in accordance with the NACS strategic objectives:

- Improving feedback from anti-corruption bodies to the public;
- Conducting a stakeholder mapping and analysis of all those working on integrity and anti-corruption, in the private, public and NGO sectors. This includes civil society organizations, traditional authorities, churches and others, in addition to private enterprises and public sector agencies. A clear workplan and budget for all agencies and clear delineation of roles and responsibilities based on what each organization is already doing so that it can be built upon should be developed;
- It is important that information, education and communication material is translated into local languages as a means of improving citizen engagement;
- Promoting social media as a tool for disseminating anti-corruption messages.

Closing remarks were then delivered by Thomas Ansorg of German Development Cooperation, who thanked all the participants for their commitment and active engagement in the virtual workshop. He urged ZACC to embark on costing the NACS as this is an important step for its implementation.

REPORT

Enhancing anti-corruption in Serbia: identifying missing pieces and bridging coordination gaps

VIRTUAL WORKSHOP

26 November 2020

Facilitators	Guillaume Nicaise, David Jackson (Senior Advisers, U4-CMI)
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Host	German Development Cooperation in Serbia
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Introduction

Over the past decade and more, significant investments have been made in tackling corruption in Serbia. Nevertheless, structural constraints have evolved and corruption remain among the most important topics in public opinion. There is a need for anti-corruption stakeholders to enhance and to streamline their efforts to tackle corruption in Serbia.

This U4 virtual workshop, gathering researchers, practitioners and civil society involved in Anti- Corruption in Serbia was an excellent opportunity to develop a common understanding of current challenges, to find new entry points and to better manage coordination among stakeholders.

The workshop focused on identifying 'missing pieces' in current AC initiatives in Serbia. Participants aimed at developing a shared understanding of corruption in Serbia and then assessing whether current anti-corruption initiatives correspond to identified challenges. On that base, participants were invited to reflect on how to pursue an initiative to better coordinate their efforts.

Focus of the workshop:

1. Facilitating a discussion on triggers and factors related to systemic corruption in Serbia

2. Analysing recent and current Anti-Corruption (AC) initiatives in Serbia, identifying leverages for action, potential gaps and entry points for intervention, with a particular focus on the governance sector.
3. Examining coordination opportunities among AC stakeholders

Objectives & outcomes:

<i>Focus</i>	<i>Objectives</i>	<i>Outcomes</i>
Analysing the evolution of corruption and current AC initiatives in Serbia...	...to develop a common understanding on challenges and existing engagement capacities to face corruption challenges...	...to find new leverages for action and entry points for AC initiatives
Assessing stakeholders' coordination framework...	...to increase awareness on potential improvements for collaboration among AC stakeholders in Serbia...	...to pursue a collective initiative to improve that coordination and then boost the effectiveness of AC initiatives

FIRST SESSION

Following formal welcoming remarks from the German Development Cooperation Country Director, Ms. Daniela Funke, and an introduction by U4, the first session focused on building a common understanding on corruption in Serbia. The objective was to reflect on the notion of systemic corruption, the political economy of corruption and the evolution of corruption in Serbia over the last ten years. Accordingly, the facilitators presented pieces of research on the topic and discussions followed with participants in a plenary session.

SESSION TWO

During that session, Anti-Corruption Expert Jovan Nicic presented his report analyzing anti-corruption initiatives in Serbia. The objective was to share knowledge and experiences from the last decade of anti-corruption. Following that presentation, the expert answered questions from participants.

The report was based on 25 interviews with AC stakeholders in Serbia. For interviewees, corruption in Serbia is a social phenomenon. Political factors and personal decisions are less important than social factors for influencing the nature of corruption in Serbia.

SESSION THREE

Session three was based on a participative methodology to identify entry points and to understand how actors may engage into anti-corruption initiatives, both in AC targeted projects as well as in projects with another primary focus area. Accordingly, participants were divided into four to five groups and discussed what should be added to the anti-corruption map (state reform, oversight/enforcement, citizen participation, political aspects). Participants also had to define a change to be reached in their sector and possibly the related conditions and steps to achieve it.

The different groups were: social accountability, oversight/enforcement, civil society, politization of public services.

Discussions were very constructive, with clear ideas to be developed by each identified sector.

After the group work, one member of each group presented key ideas during the plenary session afterwards. As a way to present reflections, a summary of the discussion that took place in the group over/enforcement are presented below:

The Group focused on **"Reducing politicization and boosting the independence of the judiciary and anti-corruption institutions"**

Main challenges:

_Enabling environment and effective cooperation of anti-corruption institutions with other institutions and stakeholders;

_ Adequate institutional capacities (human, financial, and technical resources) of anti-corruption institutions;

_ Citizens' perception of the status and independence in work of anti-corruption institutions.

What needs to change/improve:

_ The approach of Government and National Assembly to the strengthening of institutional capacities and guarantees of independence of anti-corruption institutions through regular securing of adequate budget, adequate constitutional and normative interventions, appropriate infrastructure conditions, regular consideration of their reports and recommendations, and organization of public hearings on actual issues in the area of fight against corruption.

_ The approach to HR Management within anti-corruption institutions.

_ The approach of Anti-Corruption institutions to the public.

Some of the practical steps:

_ Establishing and strengthening cooperation and coordination mechanisms between anti-corruption institutions and other public institutions.

_ More pro-active work of anti-corruption institutions with citizens, by preparation and implementation of the promotional activities to present their work and promote and explain the implementation of anti-corruption mechanisms (such as whistleblowing and whistleblowers protection).

_ Enhance transparency (as a tool for straining public trust in the anti-corruption institutions) by making publicly available information on case resolutions (with wider context or explanation).

_ Involving the business sector in anti-corruption initiatives, especially in sectors/processes with recognized considerable risk of corruption (such as public procurement, public-private partnership, etc.).

_ Development of transparent procedures for inception of cooperation with the CSOs, as well as of more pro-active alliances with donors and CSOs – not just reactive measures.

_ Continuation of organizing focused and advanced training for employees in anti-corruption institutions on concrete topics and fields (such as financial forensics) as well as

_ Learning-oriented “post-mortem” of corruption cases, including mechanisms for tracking and following up on the outcomes, including strategies to increase the number of successful cases with counterparts.

SESSION FOUR

This session aimed at coordinating the next step by reflecting on how to boost coordination among AC stakeholders and how to pursue a collective action. This session started by a presentation of findings. In particular, it was emphasized that, according to interviewees, there is a lack of coordination & synergies among AC stakeholders in Serbia.

A discussion was then facilitated among participants.

CONCLUDING REMARKS

The GIZ country director for Serbia, Daniela Funke emphasized the high quality of the workshop and the willingness to go further with the ideas that were developed during the workshop.

OVERALL EVALUATION

Just after the workshop, participants were asked to answer a survey on the quality of the workshop. 27.7% of respondents declared to be very satisfied by the workshop and 72.73% declared to be satisfied.

REPORT

Addressing corruption in the Zimbabwe Pharmaceuticals Sub-Sector VIRTUAL WORKSHOP

9 December 2020

Facilitators	Monica Kirya, (Senior Adviser, U4-CMI)
	Sarah Steingrüber (Affiliate expert, U4-CMI)
Host	UK Foreign, Commonwealth and Development office in Zimbabwe

Summary

The virtual workshop took place via the online platform ZOOM on 9th of December 2020. The event was hosted by the Zimbabwe - UK Foreign, Commonwealth and Development office, in conjunction with the U4 Anti-Corruption Resource Centre. The aim of the virtual workshop was to provide a forum where development partners in Zimbabwe and the Government of Zimbabwe, together with other stakeholders in NatPharm and the health sector, could discuss and agree on ways to address corruption challenges in Zimbabwe's Pharmaceuticals sub-sector.

The specific objectives of the workshops were:

1. To jointly assess, agree on and prioritize the corruption risks in the Zimbabwe pharmaceuticals sub-sector.
2. To explore feasible entry points, tools, and reforms for addressing these risks considering the prevailing political settlement.
3. To agree on a broad action plan and way forward for addressing corruption in the Zimbabwe pharmaceuticals sub-sector.

The online event was divided into three sessions, during which representatives from the Zimbabwe government, academia, civil society, development partners and U4 experts gave

presentations and engaged in discussions on challenges, opportunities, and ways forward in addressing corruption in the Zimbabwe pharmaceutical sub-sector.

Introduction

A representative from UK FCDO gave opening remarks and welcomed participants to the workshop. This was followed by the U4-team providing further instructions on the agenda for the day, online housekeeping rules, and guidance on technical issues that might occur.

Session one

Presentation 1 – Corruption challenges and mitigation strategies in the Zimbabwe pharmaceuticals sub-sector: a view from NatPharm

Mr. Zealous Nyabadza from NatPharm spoke about corruption challenges and mitigation strategies in Zimbabwe's pharmaceuticals sub-sector. The vision statement of NatPharm is "*We envision a Zimbabwe in which every citizen has access to affordable, quality medicines and medical supplies at the point of need*". Corruption undermines this vision. The main corruption challenges mentioned by NatPharm were bribery, theft, fraud, falsification of information, falsified medicine, and undue influence in decision-making. Corruption risks along the pharmaceutical value-chain occur in procurement, warehousing, and distribution of medicines.

Procurement is a risk area for abuse because it is NatPharm's largest expenditure item, constituting over 60 % of the annual budget spending. The bidding process is especially vulnerable to corruption and abuse. NatPharm listed the following measures currently employed against procurement corruption:

- Internal procurement guidelines and standard operation procedures.
- An adjudication committee consisting of multidisciplinary experts from various departments who are randomly selected from different institutions. Members serve one-year terms.
- A procurement review committee which evaluates the procurement process to ensure its efficacy.
- Internal and external audits.
- Regular trainings and technical assistance for procurement officials.

- Payment to suppliers is done only after successful delivery and certification from the appropriate department. A bank guarantee is also requested if pre-payment is required.
- NatPharm also have an e-procurement system and subscribes to TiPOFFS Anonymous.

Countermeasures against abuse in the warehouse part of the pharmaceutical value chain include:

- CCT cameras, and separate storage location for different types of medicines (e.g., bulk items, cold chain storage, and expired medicines),
- Secure waste management systems, and rotating security guards.

Countermeasures against corruption risks associated with distribution of pharmaceuticals from central warehouse to health institutions:

- Vehicles fitted with TRACKIT and constantly monitored from security department.
- External security during loading.
- Signed invoice at delivery, and software system (TransIT) where invoices are uploaded (batch number, quantity, and expiration date).

Overarching corporate measures to prevent and mitigate corruption risks include a committee that investigates risk and possible mitigation strategies for pronounced risk areas for abuse, as well as collaboration with development partners, the Auditor General and the Zimbabwe Anti-Corruption Commission. Adopting technology-based solutions throughout the value-chain is a priority, as is ensuring a conducive internal corporate culture at NatPharm.

The presentation was a question-and-answer session. Some of the issues that were raised were:

- Monitoring of falsified medicines: The Medicines Control Authority of Zimbabwe conducts strict controls to minimise this problem.
- Working relationship between NatPharm and the Procurement Regulatory Authority of Zimbabwe (PRAZ): PRAZ holds NatPharm to account on the procurement process and ensures that it is done in accordance with regulations.

Presentation 2 – Corruption risks and mitigation strategies in the Zimbabwe Pharmaceutical sub-sector: a view from civil society

Ms. Muchaneta Mundopa from Transparency International Zimbabwe presented a civil society perspective of corruption risks and mitigation strategies in Zimbabwe's pharmaceutical sub-sector. Like the previous speaker, procurement and distribution of medication were highlighted as particularly vulnerable to corruption. Procurement corruption is exemplified by the DRAX

scandal in 2020, which saw the minister of health in Zimbabwe charged with procurement corruption after awarding a tender allegedly without going through the proper process.

Audit reports done by the Global Fund in 2020 show that medical distribution has improved, although the distribution process is still not transparent enough.

Research by Transparency International Zimbabwe (TI-Zim) has shown conflicts of interest involving companies involved in the procurement of COVID-19 materials and government officials. Beneficial ownership is an important solution to ensure transparency and reduce corruption and abuse in the procurement process.

Recommendations from TI-Zim on reducing corruption in pharmaceuticals include:

- Investing in a transparent e-procurement system.
- Enhancing whistle-blower protection.
- Expanding enforcements and sanctions.
- Increasing transparency in tendering and contracting.
- Supporting sectoral approaches to anti-corruption to better target sector risks, loopholes, and vulnerabilities.

The presentation was followed by a question-and-answer session. Some of the issues that came up were:

- Implementing beneficial ownership: Procurement contracts could be published online for improved transparency and public accountability.
- Investigative journalism is important in exposing political corruption and disseminating information on corruption to the wider public in an easy and understandable manner.

Which corruption risks should be prioritised and why?

Mr. Eddington Munatsi from the Office of the Auditor General made some remarks on which corruption challenges should be prioritised in the Zimbabwe's pharmaceuticals sub-sector and why. The following challenges were identified as some of the most pressing:

- Procurement of medicines, warehousing/storage, and distribution of medicine. There is a risk of fraud and bribery by suppliers which manifests as changes to packaging, quantity and/or medicine content after delivery.
- In warehousing/storage the dual (manual and automatic) updating system facilitate opportunities for abuse such as pillage and fraud.
- In distribution of medicine, false or misleading labelling and/or medicine content exacerbates an environment for corruption and abuse.

- Expired drugs which are not identified or disposed in a timely manner adversely affects service delivery and reduces the quality of care provided.

Session Two

Presentation1 – Good practices and tools for addressing corruption in the pharmaceuticals sub-sector using global examples with a focus on anglophone sub-Saharan Africa

Ms. Sarah Steingrüber, Independent consultant and U4 Affiliate expert spoke about good practices and tools for addressing corruption in the pharmaceuticals sub-sector, using global examples with a focus on anglophone sub-Saharan Africa.

Ukraine serves as a useful example of successful health sector anti-corruption reforms. After the EUROMAIDEN revolution in 2014, the government embedded anti-corruption into the national healthcare reform strategy of 2015-2020. This was part of a wider effort to address and tackle inefficiencies, control costs, and improve patient care.

Other examples of anti-corruption measures for the selection/distribution part of the pharmaceutical value chain are:

- Conflict of interest management.
- Beneficial ownership management.
- Improved pharmaceutical needs forecasting; and
- Restricting reimbursement for formulary-only products.

Anti-corruption measures for the procurement process include:

- E-procurement, open contracting, and integrity pacts.
- Mandatory declaration of interests.
- Beneficial ownership transparency.
- Independent monitoring of pharmaceutical procurement; and
- Increased local pharmaceutical manufacturing/procurement.

To ensure that these anti-corruption efforts are effective and to learn what works best, monitoring and evaluation of on-going initiatives is necessary.

The presentation was followed by a question-and-answer session. Participants highlighted the following:

- Often, law and policy are inadequate in dealing with the problem of corruption and evidence of what works is scarce.

- Political will to tackle corruption is limited, and it is important to find ways of incentivising politicians to align with anti-corruption law and policy.

Presentation 2 – Identifying feasible approaches and entry points in contexts of political contestation: lessons from the Anti-Corruption Evidence Programme

Dr. Dina Balabanova presented on identifying feasible approaches and entry points for anti-corruption interventions in contexts of political contestation. She stressed the importance of addressing informal and political drivers of corruption as well as sector specific drivers of abuse. Drivers of corruption in the sub-sector include health system formal and informal power relations and political networks, social norms, and coping mechanisms for dealing with limited resources and inefficiency by street-level bureaucrats.

Evidence for the success of top-down anti-corruption regulatory and enforcement approaches is almost non-existent. More context-specific interventions that consider the diverse forms and drivers of corruption is important. In addition, it is important to remember that “one size does not fit all”.

Normative anti-corruption approaches have largely ignored political power and social contexts, the incentives and interactions of frontline actors, and the complexity and disjointed nature of regulatory systems. The shift in anti-corruption approaches towards a whole-of-government approach aims to rectify the short-comings of this normative anti-corruption approach. It aims to do this through identifying risks in the health system and design preventive actions accordingly, while also addressing broader governance and stewardship deficiencies.

This novel system approach to anti-corruption interventions will only be successful if adequately complemented with bottom-up strategies which are aligned with the interests of relevant actors, especially those with enough bargaining power in the targeted sector to ensure proper mainstreaming. The novel system approach emphasizes the following in the design of anti-corruption interventions:

- Incentives and constraints faced by individuals
- Institutional factors
- Societal factors
- Political power and incentives
- Interconnections between different types of corruption.

This approach encourages interventions with a greater chance of success because they are specific to the corruption type, provider and setting, thereby achieving a wider impact and higher institutional feasibility.

During the ensuing question and answer session, the following issues were raised:

- It can be difficult to accurately assess how much a sector is affected by corruption due to sensitivity of the topic and lack of corruption data aggregation.
- It is important to understand a country's governance and political needs and dig deeper into the specific corruption problems.
- Building alliances between actors is an important strategy.
- Anti-corruption reforms should take care not to reinforce perceptions and narratives of corruption as being endemic to a setting/context. This is because, paradoxically, such narratives play a role in undermining anti-corruption efforts by making people feel that "everyone is doing it."

Ms. Muchaneta Mwonzora from Crown Agents gave some remarks on which tools, approaches and entry points would be the most feasible for Zimbabwe and why. She made several suggestions which were further supplemented by the participants:

- Adopting a robust e-procurement system which will help reduce the risk of human error and abuse.
- Ensuring that newly adopted policies are rolled out and enforced properly.
- People need to be empowered to build their capacity and to stand their ground if faced with pressures of abuse.
- Placing short time-limits on service terms for boards and committees so that people do not become entrenched in the system and abuse their power.
- Strengthening civil society accountability measures to hold public and private actors accountable.
- Outsourcing procurement to professional organizations or creating hybrid structures that support anti-corruption mainstreaming practices.
- Stricter adherence to statutory requirements and waste management to reduce service inefficiencies and opportunities for fraud and abuse.
- Ensuring proper monitoring and evaluation mechanisms to learn what works and what does not work.
- Evoking the law on breach of contracts and claims for restitution of public funds in a more systematic manner.
- Creating uncompromised assessment boards and reviews of suppliers to ensure accountability and quality of contracted services.
- Establishing a system that can distinguish the old from the new medicine to reduce the level of expired drugs in circulation.

- Conducting a stakeholder analysis and identifying groups of actors who have decision-making power but are "losers" under the current system and might be in favor of anti-corruption reforms.
- Aligning anti-corruption reforms with political incentives by illustrating how improved health outcomes would impact on political popularity.

Session three

Presentation: The WHO-UNDP-Global Fund-World Bank ACTA Alliance.

The Anti-corruption, Transparency and Accountability (ACTA) Alliance was formed by the UNDP, WHO, Global Fund, and World Bank to build on tested new approaches to manage the risk of corruption in the health sector. During the initial meeting in February 2019, corruption risk assessment and management emerged as crucial to mainstreaming anti-corruption measures into health sector strategic planning. The Alliance promotes methodologies and implementation strategies to manage corruption risks in the health sector. They include:

- Participatory assessment/ identification of key vulnerabilities, entry points and preventive measures in specific contexts.
- Building upon demonstrated efficiency gains in initial implementation.

The ACTA Alliance has four workstreams and four expected outcomes. The four workstreams are:

1. Capacity development on ACTA in the health sector for multiple stakeholders.
2. Monitoring and evaluation on ACTA measures for health.
3. Integration of ACTA into health system strengthening normative guidance.
4. Applying fraud and corruption risk assessment methodologies to generate bespoke anti-corruption approaches.

The four expected outcomes are to:

1. **Unify** the multisectoral approach to corruption
2. **Address** shared problems that demand collective action
3. **Develop** clear outputs to be implemented on country level
4. **Reduce** corruption and increase efficiency and effectiveness of health interventions

To date, the ACTA Alliance has organised and produced a variety of events and materials. UNDP will (within the ACTA Alliance) continue to focus on country level risk assessments and capacity building.

Within the context of Zimbabwe, UNDP has been working the pharmaceutical sub-sector for some years. It is involved in managing and procuring large volumes of health products, such as COVID-19 items, to the country. These are stored at NatPharm and distributed to delivery points using the national system. Risks of abuse and corruption are present in the supply chain system and at warehouses, but efforts to strengthen the supply chain and warehouse management are ongoing. However, procurement fraud, leakages, and shortfalls at central warehouses and at health facilities have been reported in the media.

To combat system deficiencies and pharmaceutical sub-sector corruption, the UNDP has done the following so far:

- Supported the Internal Audit Department of the MOHCC to develop governance, risk management and control policies and an Internal Audit manual.
- Established three regional Audit and Risk committees.
- Provided capacity strengthening and training to NatPharm and MoHCC.
- Conducted Anti-corruption activities such as engagement and advocacy with relevant government agencies, engagement with civil society organisations, and engagement with key regulatory authorities such as PRAZ, MCAZ, etc.
- Comprehensive assessment of NatPharm warehouse management systems and the development of a Master Plan to guide system improvements.
- Constructed new central warehouses and provided capacity building for health workers at different district levels.

UNDPs engagement has so far achieved the following:

- Secured governmental and political commitment for these reforms at the highest level.
- On-going engagements with regulatory authorities, e.g., PRAZ
- Successfully completed and implemented the inventory management system and Master Plan for NatPharm.
- Two successful workshops on anti-corruption and health completed with representatives from anti-corruption bodies.

Despite these achievements, the challenges arising from the COVID-19 pandemic cannot be ignored. The pandemic has slowed down anti-corruption reform targets and the work UNDP have been doing in Zimbabwe. On top of that, recent restructuring at MoHCC and NatPharm has forced UNDP to re-imagine its collaboration and approach. Funding has been affected and the scarcity of financial resources is another challenge to the program workstreams and outcomes.

Looking forward, the UNDP plans to do the following in Zimbabwe's pharmaceutical sub-sector in 2021:

- Inaugurate a National Anti-Corruption workshop.
- Re-engage with the MoHCC and NatPharm.
- Review activities in the context of COVID-19.
- Capacity building of key actors - MoHCC, ZAAC, OAG, Parliamentary committee on health, etc.
- Strengthen collaboration with other anti-corruption institutions in the country.
- Scale up electronic Logistics Management Information System to all health facilities.
- Continue to support NatPharm with technical assistance and implementation of the NatPharm Master Plan.
- Promote the participation of civil society organisations and Public Sector officers in U4's online course in collaboration with Sida /Sweden and other U4 partners.

The workshop ended with a summary of workshop highlights and action points which was presented by the U4 team. NatPharm and SIDA provided closing remarks.
