

Fifteenth Commonwealth Regional Conference for Heads of Anti-corruption Agencies in Africa

Cape Town, South Africa

5–9 May 2025



The Commonwealth

PROCEEDINGS OF THE

Fifteenth Commonwealth Regional Conference for Heads of Anti-Corruption Agencies in Africa

Cape Town, South Africa
5–9 May 2025



The Commonwealth

Authored by Dr Roger Koranteng and the Special Investigating Unit (SIU), South Africa

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Acronyms and Abbreviations

ACCS	Anti-Corruption Commission Seychelles
ACA	anti-corruption agency
Adv.	Advocate
AI	artificial intelligence
AML	anti-money laundering
AU	African Union
AUABC	African Union Advisory Board Against Corruption
CEO	Chief Executive Officer
CHRAJ	Commission on Human Rights and Administrative Justice (Ghana)
CDF	Constituency Development Fund (Zambia)
DCEC	Directorate on Corruption and Economic Crime (Botswana)
DCEO	Directorate on Corruption and Economic Offences (Lesotho)
EFCC	Economic and Financial Crimes Commission (Nigeria)
EOCO	Economic and Organised Crime Office (Ghana)
FCC	Financial Crimes Commission (Mauritius)
GCCC	Central Anti-Corruption Bureau (Mozambique)
HAPLUCIA	High Authority for the Prevention and Fight Against Corruption and Related Offences (Togo)
HR	human resources
IACCC	International Anti-Corruption Coordination Centre
ICPC	Independent Corrupt Practices and Other Related Offences Commission (Nigeria)
IPPIS	Integrated Personnel and Payroll Information System (Nigeria)
LAGASA	Law and Governance Academy of Southern Africa
MEC	Member of the Executive Council (South Africa)
MLAT	mutual legal assistance treaty
MoU	memorandum of understanding

NACAP	National Anti-Corruption Action Plan
NACS	National Anti-Corruption Strategy (South Africa)
NACSAP	National Anti-Corruption Strategy and Action Plan (Namibia, Tanzania)
NGO	non-governmental organisation
NPA	National Prosecuting Authority (South Africa)
OPP	Office of the Public Protector (South Africa)
OSP	Office of the Special Prosecutor (Ghana)
PCCB	Prevention and Combating of Corruption Bureau (Tanzania)
PSC	Public Service Commission
R	rand
SADC	Southern African Development Community
SIU	Special Investigating Unit (South Africa)
TIE	Tanzania Institute of Education
UAE	United Arab Emirates
UNCAC	United Nations Convention Against Corruption
UNODC	UN Office on Drugs and Crime

Message from the Host

Advocate (Adv.) Andy Mothibi, Head and Chief Executive of the Special Investigating Unit (South Africa) and Incoming Chairperson of the 16th Commonwealth Regional Conference of Heads of Anti-Corruption Agencies in Africa

The Head and Chief Executive of the Special Investigating Unit (SIU), Republic of South Africa (RSA) acknowledged all state parties for their participation in the past five (5) days and for their contribution to ensure the success of the 15th Commonwealth Regional Conference of Heads of Anti-Corruption Agencies in Africa. He believed the sessions had been an enriching and engaging time, filled with insightful discussions, hands-on activities, and valuable learning experiences to support the fight against corruption in Africa and across the world. He expressed his gratitude to all attendees, particularly the host, the Special Investigating Unit (SIU), the organising committee and the Commonwealth Secretariat under the leadership of Dr Roger Koranteng and Mr Leonard Lekgetho Chief Operation Officer (COO-SIU), respectively, for their dedication to the conference.

Adv. Mothibi recognised the valuable contributions of the speakers, panel members and participants who enriched the discussions on various topics. To the facilitators, he said thank you for their professionalism in facilitating various panels, sharing knowledge, expertise, dedication and engaging in information exchanges and knowledge sharing on the 15th conference. He strongly believes that all efforts will make a lasting impact to improve the African continent's efforts and commitments in the fight against corruption and maleficence. The discussions had emphasised the vital role of state and non-state actors in preventing and combatting corruption. Therefore, he urged all to continue to engage non-state and state actors in their efforts to fight against corruption.

He quoted Minister of Justice and Constitutional Development of South Africa during her opening remarks when she said that:

'Corruption can destroy institutions within a country so that it becomes very costly for citizens to attain services that they are entitled to as citizens. Corruption undermines business confidence and chases away investment, placing the country in a perpetual low-growth trajectory and ending up in economic crisis. If not prevented and combated, corruption can become a window through which organised crime organisations entrench themselves within a country and its institutions. As we all know, organised criminal organisations, especially international drug dealers, have the funds to corrupt many players, including and especially in governments, and even to "capture" weak states.'

The minister further highlighted the urgent need for collaborative, inclusive and innovative approaches to combatting corruption: 'Participants should remember that corruption harms national development, undermines public trust and fuels inequality, requiring sustained commitment and action from all stakeholders.'

Importance of collective action

It is critical for African anti-corruption agencies (ACAs) to reinforce the significance of the Commonwealth as a platform for regional and global collaboration in the fight against corruption. Bringing together anti-corruption champions from the public sector, private sector and civil society helps to create good networks – ones powerful

enough to fight the corrupt networks that are holding back development in the region. To build on the momentum of the future Commonwealth conferences and on the energy of the region's anti-corruption leaders, it is crucial that member countries continue to prioritise collaboration and collective action.

A government's anti-corruption agencies need close co-operation and sustainable collaboration with the private sector and civil society if they want to develop a more inclusive strategy to prevent corruption and if they want that strategy to work in practice. That applies not only at the country and sector levels, but at the regional level too. And that is what collective action can bring in this fight against corruption.

Key take aways

- The 15th Commonwealth Regional Conference of Heads of Anti-Corruption Agencies in Africa has recognised the crucial role of civil society, the media and other non-state actors in promoting transparency, accountability and good governance.
- The conference emphasised the importance of engaging these actors in anti-corruption efforts, creating a truly inclusive environment for change.
- The conference has rejuvenated African dialogue and direct energy towards practical mechanisms to reduce corruption and improve ethical practices across the public and private sectors and among citizens in the continent.
- The conference has provided a robust conceptual framework and strategic priorities to guide anti-corruption approaches across relevant sectors in the continent and globally.
- The conference has emphasised the importance of collective co-ordination, co-operation and collaboration between African anti-corruption agencies, businesses, citizens and civil society in efforts to reduce corruption and improve accountability and ethical practices.
- The conference has provided a tool for monitoring progress on the Commonwealth Regional Conference of Heads of Anti-Corruption Agencies recommendations and outcomes to ensure a corruption-free society in Africa and globally.
- The conference has highlighted the importance of whistle-blowers' protection in the fight against corruption.

The former Chief Justice Zondo, in delivering his keynote address, noted the critical role that protected and motivated whistle-blowers can play in exposing unethical conduct. He said:

'Incentivising whistle-blowers would be a meaningful step toward curbing entrenched corruption.'

The former Chief Justice Zondo noted that many potential whistle-blowers are deterred by fear of retaliation, job loss or even threats to their safety. Introducing proper incentives and robust protection mechanisms could encourage more people to come forward with vital information. He went on:

'This would go a long way in cleansing the system of corrupt practices. Therefore, in the struggle for transparency and accountability, I strongly believe that whistle-blowers play an invaluable role. Increasingly, policy-makers, media outlets and many types of civil society organisations recognise the value whistle-blowers provide and the need to protect them. Unfortunately, despite increasing efforts in many

countries and jurisdictions, whistle-blowers still fear retaliation and worry about whether their concerns will be addressed.

Adv. Mothibi reiterated the commitment to creating a corruption-free world, where citizens can trust their institutions and leaders. He said he would like to encourage participants to take concrete steps to implement the conference's outcomes and to continue working together towards a more just and equitable world. He went on to further call for continued commitment to implementing the strategies and recommendations discussed during the conference.

Lastly, he encouraged all participants to share lessons learned in the 15th Commonwealth Regional Conference of Heads of Anti-Corruption Agencies in Africa and best practices within their respective countries and with the wider Commonwealth network.

He further encouraged all to stay connected, continue the conversations, and support each other in their professional journeys and in the fight against corruption in Africa and globally. The relationships and networks built between African countries are invaluable and can lead to future collaborations, co-operation and successes.

Introduction

This report takes in to account the proceedings of the 15th Commonwealth Conference and the Annual General Meeting for the Heads of Anti-corruption Agencies in Africa held 5–9 May 2025 in the Western Cape, South Africa, under the theme '*Enhancing an Inclusive Participation of State and Non-State Actors to Prevent and Combat Corruption*'.

Attendance

In attendance at the 15th Commonwealth Conference held in Cape Town, South Africa, were representatives from 21 African state of the Commonwealth: Botswana, Cameroon, Eswatini, The Gambia, Kenya, Lesotho, Malawi, Mauritius, Namibia, Nigeria, Seychelles, Sierra Leone, South Africa, Tanzania, Togo, Uganda and Zambia.

This conference sparked interest in various sectors, leading to participation from the South African Government as represented by the Minister of Justice and Constitutional Development, Hon. Mmamoloko Kubayi, The Public Protector of South Africa, Justice Raymond Zondo (State Capture Commission), Prof. Firoz Cachalia (Chairperson, National Anti-Corruption Advisory Council (NACAC)), civil society and the private sector.



Hon. Mmamoloko Kubayi, Minister of Justice and Constitutional Development, with the delegates

Summary of the Proceedings

Day 1: Monday 5 May 2025

Opening ceremony

Master of Ceremonies, Mr Kaizer Kganyago, Chief Stakeholder Relations and Communication Officer, SIU

Welcome remarks

Adv. Andy Mothibi, Chief Executive and Head, SIU, South Africa

As the host of the conference, Adv. Mothibi, in his welcome remarks recognised the presence of the Minister of Justice and Constitutional Development, Hon. Mmamoloko Kubayi, and other key government officials, as well as national, regional and international public and private sector distinguished officials and guests, and civil society representatives in attendance. He stressed the need to adopt in the anti-corruption strategy, a whole of society and whole of government approach in the fight to combat corruption. He extended a vote of thanks to the convenor of the 15th Commonwealth Conference, the Commonwealth Secretariat, Dr Roger Koranteng and his team, praising their good work and commitment in delivering the training for the Commonwealth Africa members of the anti-corruption authorities. He also acknowledged the good work by the members of the Special Investigating Unit (SIU), who worked tirelessly to co-organise the conference with Dr Koranteng's team. He specifically welcomed the heads of anti-corruption authorities.



Adv. Andy Mothibi, Head, Special Investigation Unit, South Africa

Adv. Mothibi emphasised Dr Koranteng's statement as expressed in the conference theme – that it is vital to remain united in the fight against corruption. One of the resolutions of the 14th Commonwealth Conference was to enhance efforts to combat corruption by increasing co-operation between local, regional and international agencies, and emphasise the critical need to use technology to combat corruption to achieve Sustainable Development Goal (SDG) 16. He further indicated that the conference would provide opportunities to share best practices, to collaborate and to discuss innovative measures to prevent and combat corruption. He mentioned the launch of the SIU Anti-Corruption and Cyber Academy ('the Academy'), established with the support of the French government through the French Embassy in South Africa, and the support of the Minister of Justice and Constitutional Development.

He extended an invitation to the heads of the anti-corruption and law enforcement agencies to make use of and to participate in the Academy. The Academy aims to deliver capacity building in the region and to the world. He recognised the partnership with the Hong Kong Independent Commission Against Corruption on sharing best practices with the SIU, as well as several other partnerships with countries and entities, including academic institutions, through signed memorandums of understanding (MoUs). The training provided by the Academy continues to provide diverse training to the benefit of many countries and agencies. In his conclusion, Adv. Mothibi mentioned that corruption prevention, advocacy and awareness, as well as digital investigative competencies, are central to the SIU's work. He urged synergy and collaboration in the delivery of capacity-building training and the sharing of expertise in the fight against corruption.

French Embassy partnership and collaboration

David Martinon, French Ambassador to the Republic of South Africa

The Ambassador gave a background to the partnership with South Africa and the SIU, mentioning the 2023 International Agreement signed by the South Africa Minister of Justice and the French Minister of Foreign Affairs. This marked the continuation of a journey which started in 2015 during the UN Supporting Facility Dialogue and led to the deployment of three French technical experts to the Embassy to support the SIU in building capacity in fighting cybercrime and corruption, with one now based at the Justice College ('the Academy'), working with the SIU trainers to deliver training. This is a testimony to a successful partnership. He extended gratitude to the various SIU teams under the leadership of Adv. Mothibi, for their support during the French National Day celebrations on 24 July 2024, showing a true spirit of collaboration. The French Government and the Embassy, together with the SIU, have established a platform for dialogue and mutual learning, which has grown to include other law enforcement agencies in South Africa and Southern Africa. The project is thriving and is attracting key stakeholders and demonstrating a shared commitment to building a better future. He added that the French Government is proudly supporting the South African Government to exit the Financial Action Task Force (FATF) grey listing and stand together in the fight against corruption. He reiterated that the fight against corruption and cybercrime require united and collaborative efforts by all; it is not a one country's fight.

The Ambassador further mentioned the coming together of the delegates at this conference – united, engaged and solution oriented – as evidence of everyone's commitment to this global challenge. Cybercrime is an enabler of illicit activities like weapons and drug trafficking, which are linked to money laundering and cybercrime. Illicit flows impact Africa and the entire world. Collaborating in the fight against corruption and cybercrime builds a collective security.



His Excellency David Martinon, French Ambassador to the Republic of South Africa

The Ambassador stressed the need to establish networks that will enable the sharing of expertise and solutions and face the challenges together. The launch of the Academy marked the beginning of a new chapter. He mentioned that all the partners in the Academy needed to continue to work together, continue to bring in new partners through collaborative agreements, ensure the visibility of training programmes, and establish the Academy and the recognised high-level institution of learning for the continent. He closed by pledging the French Government's commitment to assisting with building capacity in cyber security. He closed by acknowledging the excellent co-operation with the SIU, the Directorate for Priority Crime Investigation (HAWKS), National Prosecuting Authority (NPA), South African Revenue Service (SARS), and many other international collaborations. He commended the SIU for the good work it continues to do, imparting skills and knowledge through the various training programmes offered through the Academy.

Video presentation: Showcasing the SIU Anti-Corruption and Cyber Academy, training programmes, facilities and success stories

The video showcases the SIU's Anti-Corruption and Cyber Academy, which was established with the support of the French and Hong Kong Governments. The Academy marks a groundbreaking initiative in the fight against financial crime and corruption. It is not only a centre for learning, but also a hub for collaboration, innovation and capacity building for law enforcement anti-corruption agencies and organisations within and beyond Africa. The surge in cybercrime in South Africa affects 40 million people and results in a loss to 20,000,000.00 rand (R). The Academy offers world class training in digital investigations, financial crime and anti-corruption strategies to equip law enforcement officials with the necessary skills to tackle corruption with confidence.

The SIU is collaborating with several internal partners (that is, Commonwealth Africa anti-corruption agencies, Southern African Development Community (SADC) member countries, the French Embassy, Kenya School of Revenue Administration,

and the Hong Kong International Academy Against Corruption) and other global experts to equip learners with the latest skills, technology and knowledge to combat the complexities of modern-day corruption. The Academy is an outcome of a 2016 SIU vision and a new strategy. The vision has matured into reality, providing a gateway for expertise, innovation and global collaboration.

Conference overview, objectives and expected outcomes

Dr Roger Koranteng, Head, Public Sector Governance, Commonwealth Secretariat, UK

Dr Roger Koranteng opened his speech by recognising, welcoming, thanking and greeting the Minister of Justice and Constitutional Development, Hon. Mmamoloko Kubayi; the Ambassador to the Republic of South Africa, Mr David Martinon; Adv. Andy Mothibi, Harry Maila, Director-General, Western Cape Provincial Government; Adv. Andy Mothibi, Head of the Special Investigating Unit; the heads of anti-corruption agencies; senior government officials, international organisations and partners, and all the attendees of the conference. He praised the host city, Cape Town, for its extraordinary beauty, deep historical significance, its scenic tourist attractions, remarkable biodiversity, and award-winning cuisines and wines.



Dr Roger Koranteng, Head of Public Sector Governance, Commonwealth Secretariat, UK

He took the delegates back 15 years to when the first conference was held in Gaborone, Botswana. The conference started with an idea that became a vision, and ultimately the reality of a vibrant association, through his commitment and the support of colleagues in the region. He recognised and extended his appreciation to the individuals who supported the idea to form the association 15 years ago and persisted in seeing it through. In comparison to other associations he established in other Commonwealth regional continents, the Africa association remains close to his heart, as the foundation for the others that came after it. The 15th Commonwealth Conference pulled in the highest number of participants from outside South Africa, 22 to be precise. He mentioned the interesting places in the region that the Commonwealth Secretariat has taken the conference to, from Gaborone in Botswana to Cape Town in South Africa. The conference has allowed members to explore the African continent as they share experiences, best practice and solutions in the fight against corruption.

A key Commonwealth mandate is to phase out corruption, tackling its disruptive impact. It is the determination and lasting support to member countries that led to establishing the regional networks, linking national anti-corruption agencies across Commonwealth African neighbour countries. It is only through collaboration, Dr Koranteng went on, that more can be achieved and impact can be sustained. Since its establishment in 2011, the association has provided a unique platform for sharing emerging practices and innovations in the fight against corruption and promoting good governance in Commonwealth African countries. The association has further promoted collaboration and learning by brokering the sharing of best practices and is helping to benchmark agencies' capabilities while facilitating peer reviews and secondments between member countries. The Commonwealth Secretariat's supporting role, powers, capabilities and niche focus enable it to bring countries together to share developmental experiences and identify best-fit solutions. The Secretariat's capacity-building role was enhanced with its partnership with the Government of Botswana in 2013, when the Commonwealth Africa Anti-Corruption Centre was established, a reaffirmation of its commitment to support member countries to fight corruption.

Dr Koranteng outlined what the programme held for the delegates, stressing that the conference would offer experience and best practice sharing, as well as international co-operation and collaboration opportunities. Its general objective was to bring together anti-corruption agencies and relevant international organisations and partners to share and learn lessons and success stories in the fight against corruption. These would be enhanced by the sharing of country, regional and international experiences by international organisations and experts. To be effective, institutions need to establish communities of practice built on professional networks to facilitate the exchange of knowledge and solutions.

He closed by giving the programme overview and thanking the minister once again for her attendance.

Remarks by Western Cape Province Government

Harry Maila, Director-General, Western Cape Provincial Government



Harry Maila, Director-General, Western Cape Provincial Government

Mr Harry Maila welcomed the minister and Adv. Mothibi, and all the distinguished guests and participants. In his remarks, he stressed that corruption impacts public value and good governance. Good governance and clean administration are about smart compliance and commitment to accountability, transparency and ethical leadership. The commitment that the Western Cape made around ten years ago was now paying off, and it was all thanks to Adv. Mothibi's leadership, he said. Corruption eats away from service delivery. The Western Cape Province is working towards creating jobs and growing the economy, look at its residents' safety, and building a healthy and educated society. This is captured in the province's five-year strategic plan. To achieve these goals, clean and good governance, including a focus on anti-corruption, are key.

The speaker went on to emphasise that the province's vision is to fast-track economic growth and create opportunities for residents to thrive. The biggest aim is to build trust among residents by practising good governance principles, which will in turn improve service delivery and create sustainability and bring meaningful change to people's lives. To build a government that people trust requires a corruption-free government of integrity, one that listens to the people and responds with honesty.

Mr Maila closed his speech by thanking and congratulating Adv. Mothibi as the host and the Minister, and by wishing a successful conference, on behalf of the Premier (who could not make it to the conference) and the citizens of South Africa. He ended by indicating that the conference was one way of sowing a seed and continuously improving in anti-corruption and good governance efforts as a country.

Remarks by the Minister of Justice and Constitutional Development and introduction of the guest of honour Hon. Mmamoloko Kubayi, Minister of Justice and Constitutional Development

The minister thanked the hosts for convening a timely and important gathering focused on developing collaborative, effective and technologically advanced strategies to prevent and combat corruption across Commonwealth nations. She urged the Commonwealth countries to formulate a united response and take a firm stance against corruption, stressing that corruption must be met with strong enforcement and that perpetrators should be compelled to return stolen assets, be arrested and face significant jail time. She went on to elaborate on the globalised nature of corruption and how it has evolved alongside globalisation and technological advancements, making it harder to detect. Digital tools and borderless financial networks have enabled the spread and sophistication of corrupt practices.

Lessons from South Africa

- The state capture era revealed how deeply corruption can embed itself in governance.
- Corruption was enabled by weakened institutions such as state-owned enterprises, the judiciary, law enforcement and the revenue service (SARS).



Hon. Mmamoloko Kubayi giving her opening remarks

- Skilled personnel were forced out, corporate governance was dismantled, and oversight mechanisms were compromised.

Impacts of corruption

- Corruption undermines democracy, damages public trust, weakens service delivery, deters investment, and increases vulnerability to instability and organised crime.
- Corruption is not confined to the public sector. Major private firms also play a significant role through illicit financial flows, trade mis-invoicing and tax evasion.

Technological tools for anti-corruption

- Artificial intelligence (AI) can be a 'game-changer' in detecting suspicious financial patterns and uncovering illicit activity.
- AI can analyse large data sets and monitor digital platforms for signs of corruption.

The minister welcomed the launch of the SIU Anti-Corruption and Cyber Academy to boost domestic and international capacity against corruption, financial crime and cybercrime. In her call for inclusive and co-ordinated action, she emphasised the importance of including civil society, protecting whistle-blowers, and building democratic institutions based on transparency and accountability. She reiterated the call for Commonwealth and global collaboration, as outlined in Article 5(4) of the UN Convention Against Corruption. She concluded with a call to collective action, emphasising that the fight against corruption is essential for democratic governance, economic growth and sustainable development. Commonwealth countries must work together, leverage technology and empower all sectors of society to eliminate the scourge of corruption. She closed her speech by welcoming all on behalf of President Cyril Ramaphosa.

Vote of thanks

Abdulai Bashiru Dapilah, Chairperson, Association of Anti-Corruption Agencies in Commonwealth Africa and Executive Director, Economic and Organised Crime Office (EOCO), Ghana

Mr Abdulai Bashiru Dapilah delivered a heartfelt vote of thanks at the conclusion of the opening ceremony. Special gratitude was extended to South Africa President Cyril Ramaphosa in absentia for welcoming the delegates into the country, and to several other dignitaries, including the Secretary-General of the Commonwealth, Her Excellency Shirley Ayorkor Botchwey, Assistant Secretary-General of the Commonwealth, Dr Luis Francheschi, and Minister of Justice and Constitutional Development, Hon. Mmamoloko Kubayi. The speaker also expressed appreciation to Dr Roger Koranteng, whose vision to curb corruption had brought the delegates together, as well as to the Head of the SIU, Adv. Mothibi, and the organising committee for their dedication and efforts in making the conference a reality. He went on further to thank all the delegates present and wished them a successful and collaborative conference, offering insightful presentations and knowledge sharing and networking opportunities.



Mr Abdulai Bashiru Dapilah delivering the vote of thanks

The rise and fall of the fourth branch of state

Adv. Lauren Kohn, Founder and Director, Law and Governance Academy of Southern Africa (LAGASA), South Africa

Adv. Lauren Kohn explained that after many years in academia, she had opened her own academy named the Law and Governance Academy of Southern Africa (LAGASA). She commended Adv. Mothibi for his SIU Anti-Corruption and Cyber Academy. She mentioned that her first doctoral article argued for the National Prosecuting Authority (NPA) to be recognised as South Africa's fourth branch of state, the integrity and accountability branch. She found a way to facilitate what had been adopted for the NPA's policy directive, the disgorgement of the unlawful gains. Vital state bodies like the Johannesburg Stock Exchange (JSE), SIU, and the Financial and Fiscal Commission (FFC) are not administrators, they more often practise a vital and major role within the state system. With these bodies' efforts, some ill-gotten

money is being recovered by the state. LAGASA is a bridging academy of excellence. It was born out of the realisation of the need for synergy. It therefore seeks to synergise with other role players from different sectors, to help future leaders and law students to think critically and analytically to hone their basic skills.

In line with the conference theme, Ad. Kohn derived the following key takeaways in relation to the commissions of inquiry:

- We need a blend of retributory and restorative justice, so that people can participate and so the truth can come to the fore. Commissions of inquiry are inclusive, people-centric models and help in exposing potential irregularities and taking preventative measures early on.
- Concerns with the recommendations of the commissions of inquiry take place when there is whitewash and no follow-through.
- It is imperative to increase inclusive participation in combatting and preventing corruption.
- The courts are testing whether cases are a matter of concern or interest to the public.
- State capture goes to the heart of public integrity and accountability.
- The commissions must be respected, capacitated, resourced and, more importantly, they must be held accountable.
- South Africa's Public Protector's role in making binding judgments is limited to certain circumstances.
- The commissions' reports should be binding than mere recommendations. The reports must be acted upon, taken further instead of being lazily looked at.
- Each case should be treated in the manner that is dictated by its merits.
- The President of South Africa is the only person responsible for the well-being of the country.
- Institutions listed in Chapter 9 of South Africa Constitutions (Chapter 9 Institutions) like the PPSA, Human Rights Commission and others, are there to strengthen constitutional democracy by ensuring the integral and accountable exercise of public power. This ensures that public money is spent for the public good.
- A compelling question arises as to when a public integrity and accountability commission's recommendations should be treated as binding as opposed to mere proposals.

Recommendations

- The President of South Africa should take a stand in establishing a permanent (not temporary as it is the norm) anti-corruption commission, as the Zondo Commission had recommended.
- Collaboration and cross-pollination will lead to no whitewashing.
- The judiciary should be held accountable for its non-actions or delays in prosecutions.
- Actors can be taken to court for not engaging.
- Institutions should work in synergy to combat corruption – the cycle of 'passing the buck' is not paying back.

- Once appointed, a commission of inquiry must be treated as a public integrity and accountability commission, be respected, resourced, capacitated and be held accountable during its lifespan, in its reporting and thereafter.
- Exercises of public power and non-exercises of power must be justifiable and, if not, they must be reviewed by a court of law. A culture of justification must be brought back.
- President Ramaphosa should seriously consider the recommendations for the establishment of a permanent standing anti-corruption commission under Chapter 9 of the Constitution.
- The Constitution Twenty-First Amendment Bill needs to be massively revamped and re-visited as it unlawfully divests the NPA of its constitutional power.

Adv. Kohn closed her presentation by stressing the need for multiple stakeholders in the fight against corruption to work together collaboratively and coherently. She said that hopefully there would be no more whitewashing commissions of inquiry.



Adv. Lauren Kohn, Founder and Director, Law and Governance Academy of Southern Africa (LAGASA)

Questions and Discussions

An official from Kenya questioned if was there anything else that could be done to compel institutions to implement the recommendations other than the goodwill of the president or head of state in implementing the recommendations, given that in the African context most commissions of inquiry are set up on a temporary basis and since the key problem is the implementation of the recommendations of these commissions. In response, Adv. Kohn indicated that the lack of implementation of the commissions' recommendations is a common problem. She referred to a book that looks at commissions of inquiry across Africa and their success rate, stating that success is often not measured by the commissions' performance but by the extent to which the recommendations are either ignored or implemented. A short answer is to look to the courts for adoption she said. The courts need to nut into this new way of thinking if political will is non-existent.

Adv. Andrea Johnson, the Head of the Investigating Directorate Against Corruption (IDAC) in the NPA, clarified that there had been a shift after the State Capture Commission. The President did several things; among them he created IDAC, which

is doing sterling work in the fight against corruption within the NPA. She added that there is a steering committee chaired by the Director-General in the Presidency, which reports to the Presidency on a quarterly basis – including on the institutional reforms recommended by the Zondo Commission being implemented. She reiterated that South Africans needed to acknowledge that there was a difference after the State Capture Commission.

Country presentation by Seychelles

Anti-Corruption Commission Seychelles

Henry Bastienne, Deputy Commissioner, and Aurestina Bonne, Human Resources and Administration Manager, Anti-Corruption Commission Seychelles (ACCS)

The Anti-Corruption Commission Seychelles (ACCS) presented a comprehensive country paper highlighting its progress, initiatives and vision for future engagement in combatting corruption. The presentation emphasised the unique challenges and successes of a small island developing state (SIDS) and its strategic approach to anti-corruption through integrity building and human resource innovation. The ACCS was established in 2016, and its mandate includes investigation, detection, prevention and prosecution. It also oversees assets declarations.



Henry Bastienne, Deputy Commissioner, Anti-Corruption Commission Seychelles

Achievements

- Seychelles is ranked 18th globally, and 1st in Africa by Transparency International.
- International collaborations and International Anti-Corruption Coordination Centre (IACCC) membership; that is, it is a member of the seven institutional member Coalition of Integrity (Col) Committee.
- It has launched a digital forensics lab.
- There are staff training programmes/peer learning.
- Ongoing investigations and prosecutions are taking place.
- It has implemented a declaration of assets of senior officials since July 2024.

Challenges

- There are limited financial, human and technical resources.
- The ACCS experienced leadership loss with the passing of the Deputy Commissioner.
- There are public expectations for rapid results.

ACCS proposed a Commonwealth Africa Human Resources (HR) Network, whose goals would be peer learning, capacity building and cross-training. The initiative was met with challenges ranging from a low response rate from anti-corruption agencies (only 10 out of 23 responded), communication barriers, and lack consistent of follow-up from ACCS's side due to other pressing commitments.

Lessons learned

- Institutional support is critical for the success of a Commonwealth Africa HR Network.
- Mobilising regional and international collaboration is important – to promote inclusivity and sustainability.
- Communications need to be clear.
- HR must be positioned as a strategic partner in anti-corruption efforts by agencies.

Recommendations

- Agencies should support the vision and implementation of the Commonwealth Africa HR Network and play a role.
- Agencies should nominate focal points.
- It is important to collaborate and integrate with regional training bodies.
- Agencies could launch virtual forums to bring HR professionals together to address capacity gaps, share knowledge and HR analytics.

Such networks will promote cross exposure across the commonwealth countries. In their closing remarks the presenters stressed that empowering individuals is vital in anti-corruption.

Questions and Discussions

A question from the floor was directed to Seychelles on whether there had been changes to the law with regards to following up on declarations of assets received from leaders in the country. Previously the declarations would be received by the ACCS commissioner, sealed and then filed without follow up, as the law did not allow ACCS to do so. The question was whether the situation had changed. The answer from Mr Bastienne was that the process with the declarations of assets was that every year the leaders declared and still ACCS did not verify those declarations. However, there is an application procedure that anyone can use if they want to verify the declarations, giving the reasons for wanting to do so. The application can be done at the ACCS Commission, although the Commission itself does not conduct a process to verify the details of declarations and compare.

The second question was a comment on how HR could address recruitment around the issue of corruption. A critical part of the training of civil servants concerned the ethics and the ethos of public service. The suggestion was for the presenters to consider how this could be woven into the recruitment process, as well as attracting and upgrading civil servants.

Country presentation by Tanzania

Integrating anti-corruption content into the education curriculum in Tanzania

Crispin F Chalamila, Director General, Prevention and Combating of Corruption Bureau (PCCB)

Crispin Chalamila opened his presentation by giving an overview of the impact of corruption, stating that it deprives residents access to much needed public services. It undermines democracy, hinders economic growth and diverts public resources from their intended proper usage, among other things. Tanzania's Prevention and Combating of Corruption Act (PCCA) empowers the Prevention and Combating of Corruption Bureau (PCCB) to uphold the principles of good governance and to eradicate corruption.

Achievements

- In collaboration with the Tanzania Institute of Education (TIE), the PCCB has successfully integrated anti-corruption content into the education curriculum for its primary and secondary schools and teacher training colleges since 2024 through a memorandum of understanding (MoU).
- As a result of this innovation, Tanzania, through the PCCB, has complied with Article 5(1–2) of the United Nations Convention Against Corruption (UNCAC). Together with the TIE, it has succeeded in integrating anti-corruption content into textbooks and making it accessible on the TIE's online library, and has successfully provided trainings to curriculum developers.
- The MoU has enabled the PCCB to comply with Section 7 of the PCCA, which requires it to involve stakeholders in the fight against corruption.
- It is in compliance with the National Anti-Corruption Strategy and Action Plan (NACSAP), a government initiative to spearhead the fight against corruption by identifying, prioritising and implementing anti-corruption measures.

Challenges

- Changing the mindset of young people is not an easy and quick task; it requires patience and the right skills to achieve results.
- The initiative still has a long way to go; more work is still required to fully reach the intended outcome.

Lessons learned

- The collaboration between stakeholders is critical in the fight against corruption.
- The collaboration with TIE has encouraged PCCB to work with more stakeholders to initiate more strategies to prevent and combat corruption.

Recommendations

- The involvement of all stakeholders is key to ensure future confidence in the fight against corruption, especially among youths.
- The way forward involves investing in anti-corruption and prevention programmes that are inclusive and focus on behaviour moulding to reduce the cost of corruption now and in the future.

Mr Chalamila closed the presentation by quoting the PCCB's motto: 'Preventing corruption is our responsibility, let's play our part.'

Questions and Discussions

An official from Ghana applauded the integration of anti-corruption programmes into the school curriculum. His question concerned the kind of follow-up interventions by PCCB beyond that; that is, training the teachers on how to equip students, for instance. In essence, he asked, what the role of the commission is. Mr Chalamila responded by indicating that in implementing this initiative, the commission prepared the lessons and trained the teachers. There is a special department within PCCB that deals with this, the Directorate of Community Education. It prepares the teaching materials and conducts seminars and short courses for the teachers.



Crispin F Chalamila, Director General, Prevention and Combating of Corruption Bureau (PCCB)

Country Presentation by Lesotho

Presentation on innovative anti-corruption initiatives

Adv. Brig. Gen. Mantso Z Sello, Director General, Directorate on Corruption and Economic Offences (DCEO)

The presentation from Lesotho aimed at sharing innovative anti-corruption strategies implemented in the country to share best practices and experiences. Adv. Brig. Gen. Mantso Z Sello detailed how the Directorate on Corruption and Economic Offences (DCEO) was established under the Prevention of Corruption and Economic Offences Act No.5 of 1999. The core business of the directorate is to prevent and fight corruption and economic crime in both the public and private sectors. Section 11 of the Money Laundering and Proceeds of Crime Act No.4 of 2008, establishes the DCEO as the Anti-Money Laundering Authority and mandates it to also prevent, investigate and prosecute money laundering and terrorist financing offences.

Achievements

- DCEO revived the District Anti-Corruption Committees (DACCs) across the country, which are established in collaboration with district administrators. They comprise members from diverse sectors and walks of life, to allow for the full participation of all state and non-state actors in the fight against corruption. The role of these committees is to prevent and combat corruption at the district level, in collaboration with DCEO.

- The initiatives implemented had resulted in increased public trust, improved service delivery and active citizen participation in the fight against corruption.



Adv. Brig. Gen. Mantso Z Sello, Director General, Directorate on Corruption and Economic Offences (DCEO)

Challenges

- There is a lack of sufficient resources.
- Dependence on international donor funding for innovations impacts the sustainability of the initiatives/projects once funding ends.
- The high costs of decentralisation and outreach also pose a problem.

Lessons learned

- There is a need to shift from over-reliance on reactive strategies to a proactive strategy.
- Citizen engagement has been a 'game changer'. There is a need for robust protection mechanisms for whistle-blowers.
- Integrity is emphasised internal meetings.

Recommendations

- It is important to strengthen the DACCs with resources and training.
- Partnerships and funding should be expanded.
- The monitoring and evaluation of decentralised offices must be regular and ongoing.

Questions and Discussions

A question from Kenya was on the mandate of the DACCs in terms of their powers, duties and structure. Do they only deal with public education and awareness issues and reporting of complaints, etc.?

The response was that since the DACCs are made up of diverse members from different walks of life, they therefore have a dynamic make-up which helps the DCEO to get information from the public from every corner and not only from government entities. This makes it easy to detect corruption earlier and prevent it. The committees serve as local watchdogs at the district level. Their primary mandate is to collaborate with the agency and to report any act or activity of corruption.

Country presentation by Botswana

The Directorate on Corruption and Economic Crime (DCEC), Botswana

Botlhale Makgekgenene, Director-General, Directorate on Corruption and Economic Crime (DCEC)

Botswana is undergoing significant anti-corruption reforms under a new government elected in 2024, marking a historic shift after 58 years. These reforms, Botlhale Makgekgenene explained, focus on strengthening the Directorate on Corruption and Economic Crime (DCEC) through legislative amendments, policy reviews, audits and institutional capacity building to promote integrity, transparency and accountability.

The speaker summarised **key initiatives and tools** as follows:

- Legislative advancements – major proposed amendments to the Corruption and Economic Crime Act, including:
 - Full independence of the DCEC.
 - Security of tenure for the Director General.
 - Reporting to Parliament instead of the President.
 - Enforcement of audit recommendations.
 - New corruption offences and minimum mandatory sentences.
 - Draft National Anti-Corruption Policy (NACP) – supported by the United Nations Office on Drugs and Crime (UNODC) and Botswana Institute for Development Policy Analysis (BIDPA).
 - Aims for a 'whole of society' approach.
- Forensic audit initiated:
 - This covers ten years of government expenditure and systems efficiency.
 - It is expected to uncover oversight gaps and improve governance.
- Significant legal wins:
 - There has been the successful prosecution and imprisonment of a former Permanent Secretary to the President (PSP) in a high-profile corruption case.
- Launch of the Lifestyle Audit Strategy:
 - Investigations under Section 34 of the Corruption and Economic Crime Act are ongoing.
- Digital asset declaration system established:
 - This includes a back-end system for analysis and verification.
 - The system establishes a digital register of interests and assets.



Botlhale Makgekgenene, Director-General, DCEC

Challenges

- Corruption in public procurement:
 - Bid rigging, collusion and inflated pricing are rampant.
 - There are weak internal controls and a lack of transparency.
- Land and transport sectors:
 - Bribery takes place involving Land Board officials and licensing corruption.
- Limited co-ordination and oversight:
 - Gaps still exists between oversight institutions.
 - There is a historical lack of consolidated anti-corruption strategies.

Lessons learned

- There is a need for institutional independence:
 - Autonomy of anti-corruption bodies is vital for effectiveness.
- Public trust is important:
 - Renewed confidence by the public leads to more corruption reports.
- Digitisation serves as a key tool:
 - Automation and digital tracking improve compliance and enforcement.
- A 'whole of society' approach works:
 - Multi-stakeholder collaboration is critical for sustainable results.

Recommendations

- Legislative amendments should be enacted promptly to institutionalise DCEC independence and strengthen legal deterrents.
- There is a need to expand forensic audit findings into concrete policy and procedural reforms.

- Internal controls and oversight mechanisms should be strengthened in high-risk sectors like procurement and land.
- It is important to promote public education campaigns to build awareness and drive citizen involvement.
- Technology and data analytics need investment for real-time monitoring and enforcement.

Botswana is aligning its anti-corruption strategies with global standards and promoting stronger inter-agency co-operation to eliminate impunity.

Questions and Discussions

A question from a Namibian official concerned the forensic auditing that has been going on for the past ten years or so, asking whether there are specific issues that drive the auditing or if it is just a 'general sweep' forensic auditing that is politically driven. The response was that it is not possible to separate anti-corruption or issues of good governance from politics. The Chairman of Audit Committee in Parliament is from the opposition party. The ruling party has been in power for 58 years, so the audit is viewed as a necessary step – because when the ruling party came into power, there were several issues around lack of funds, issues of suspicious projects that were recently awarded, etc.

There followed a question from a Zambian official – given that Zambia is also working on a law on assets and liabilities declarations. Noting that Botswana is interacting with the Ethics and Integrity Directorate, the official wanted to learn from Botswana and know in which ministry the directorate sits. When it comes to declarations, she wanted to know if all declarations for the public sector were being made to this directorate or if they were made different categories of the public sector. Lastly, she wanted to understand how easy it is to obtain declarations for serving senior officials, given the collaboration between DCEC and the directorate. The response was that there are categories of people of interest. The Ethics and Integrity Directorate falls under the Ministry of the President. The declarations are requested and are submitted to the DCEC.

Adv. Mothibi (South Africa) noted a shift to prevention, mentioning that even though reactive measures are still important, the shift is pleasing and is something that is pre-occupying South Africa with the development of the national corruption risk assessment and prevention framework. He said it was good to see that anti-corruption agencies are moving in similar directions. He mentioned that similarly to Botswana, South Africa has instituted a review of the anti-corruption architecture commissioned by the President through the National Anti-Corruption Advisory Council. His question was on expenditure and whether there was no possibility of duplication. If not, how was it that it stopped the work done by the Auditor General (AG). He wanted to understand the focus of the DCEC when it came to these expenditures as against the AG. On possible duplication of efforts in the forensic audits versus the AG's annual audits, the response was that the entities work together. Some of the DCEC's investigations emanate from the AG's reports, which are provided to the agency.

Closing Africa's integrity gap with AI-enabled systems that induce behavioural change

Dr Olu Ajayi, Chief Executive Officer, Maddison Pine, London, UK

Dr Olu Ajayi started her presentation by giving a scenario involving her grandson and what to tell him about the corruption in Africa and how today's generation is addressing it, about the kind of Africa we are building. She acknowledged that

Africa is sometimes defined in unfavourable terms. She mentioned that her presentation would focus on the solutions to addressing corruption. Corruption is about people and therefore integrity and good governance are key in efforts to address corruption. Integrity can be defined by corruption, weak accountability mechanisms and systematic inefficiencies. In Africa's context, she went on, we talk about the challenges and opportunities of governance, which in most cases means the technical issues of governance. The critical issue in this context is behavioural governance, because corruption is a state of mind and a behaviour. Corruption in this context is about finance and service delivery. Behavioural change matters because over time, it affects culture. The only way to change culture is by changing processes, and when this happens, people must do things differently. That is when behavioural change happens, leading to cultural change over the long term.



Dr Olu Ajayi, CEO, Maddison Pine London, UK

Problems with state capture, poor governance, corruption and fraud negatively impact assets value investors (AVIs), capital inflows and sustainable investments – resulting in inequity, exclusion and inequality. Individuals can bring about change if they focus in addition to the rules, on the processes that can bring about change, and putting change into practice. 'Nothing changes if nothing changes.' It is about turning rhetoric into reality.

Going back to her grandson's scenario, Dr Ajayi hoped that by the time he is getting older, the nature of these conferences would have changed to celebrating successes and systemic change in Africa. The fight against corruption can benefit from artificial intelligence (AI) because of its ability to analyse large volumes of data, from incident reporting, detecting hidden patterns and trends. It offers unprecedented tools, acting as a deterrent, and being able to identify and to prevent fraudulent acts. AI is beyond automation; it acts as a catalyst for transparency. AI can provide predictive oversight, as it can detect and predict where and when corruption is most likely to happen because it captures trends and patterns. AI presents data-based evidence that cannot be manipulated by human intervention and is not subject to biases.

The available AI tools are already in use for fraud and anomaly detection, predictive analysis and sentiment analysis. There is a growing list of AI-enabled mechanisms already, which can enhance integrity.

The speaker continued her presentation explaining that there are implementation challenges with using AI to combat corruption. These include the availability of clean data, trust and privacy concerns, and institutional readiness (there is a need for integrity skills training embedded into the curriculum from primary through to the university levels). It is important for there to be stronger legal and ethical frameworks for AI use in corporate governance and increased cross-sector partnerships with various stakeholders. AI exposes hidden patterns of corruption, reduces human discretion where bribery thrives, empowers citizen to speak out more, and predicts and prevents corruption. AI must be coupled with political will, AI literacy campaigns, civic engagement and practical whistleblowing safeguards. The whistleblowing and case management systems in use do not just detect wrongdoing, but also help to reshape the incentives, expectations and habits of public officials over time. Finally, she highlighted, digital reporting and case management can become tools for behavioural transformation, not just for compliance enforcement. They create a system where integrity is expected, enabled and rewarded, while corruption becomes risky, visible and less socially tolerated.

Questions and Discussions

Adv. Lauren Kohn (South Africa) wondered about the extent to which the speaker had reflected upon other jurisdictions in relation to best practice in ensuring ethical behaviour using AI technology and asked how we anticipate and navigate the risks, especially because it is about ethics and we don't always know what those risks are. Dr Ajayi answered by indicating that the issue of ethics and AI is a global conversation that is going around. Ethics is universal; however, Africa has its own nuances that one can look at. That is why it is important to involve and engage professional bodies in the development of solutions and interventions.

Adv. Mothibi (South Africa) acknowledged the role of AI in improving anti-corruption measures, particularly on the prevention side. He added that the SIU had started with data analytics as it implements prevention measures, by analysing the data from investigations using modelling tools. He reiterated that the use of data analytics has been a game changer in the fight against corruption, as it enables the analysis of the modus operandi. This has a huge impact on human capital resourcing and requires a change on the part of the anti-corruption authorities in terms of who and how they hire, given the non-conventional skills required in this area – that is, mathematicians and statistical modelers. This investment in recruiting the right skills at the SIU is paying off, and this is evidenced in the data they have analysed, which informs the recommended remedial actions to government departments and entities. He observed that as we transcend into the use of AI and data analytics tools, we need to be aware that the conventional resources that used to be recruited are going to have to change. His question was around resources, and he asked if the Dr Ajayi saw this really transcending the mindset of how agencies recruit. Dr Ajayi agreed with Adv. Mothibi, and flagged the fact that AI is new, and therefore it is going to necessitate a huge change in recruitment, it is going to induce change. Change is not always pleasant, but it has good outcomes. It will require institutions to look at their mandates, then map the kind of roles and competencies they require to achieve outcomes. Different kinds of skill sets are going to be required. AI systems are going to automate a lot of roles. Institutions need to draw a picture of how they are going to incorporate AI by 2030. It is time to start defining the anti-corruption agencies of the future and bring this back into the present to inform recruitment and resources.

Mr Jaco de Jager from the Association of Certified Fraud Examiners (ACFE) mentioned his organisation had released 296 articles on the use of AI and how governments could implement it within their organisations. The articles are accessible on the ACFE website. His question concerned legislation on the use of AI, with the United States (US) and the European Union (EU) having provided legislation and guidelines on the use of AI. Africa has started the process; there is draft legislation and the ACFE is involved in looking at the ethical use of AI. He referred to court cases where AI had been used in error. He noted the accuracy rate of AI is currently at 64 per cent. Training on the use of AI is important, as is collaboration with civil society and professional bodies working actively within fraud prevention, detection and investigation and who are working with other institutions and relevant international bodies in developing standards. Dr Ajayi explained that systems go through the ISO accreditation process, they are not developed in isolation. They are also developed within ethical frameworks and in partnership with professional bodies.

A question from Botswana concurred with the presentation that AI can be highly beneficial in the anti-corruption field. However, the questioner said there were three things to consider, which are information and communications technology (ICT) infrastructure challenges, funding, and human resources. With that said, her question was on how to guard against challenges of data integrity. Dr Ajayi agreed that funding is critical for the successful implementation of AI, as it requires robust ICT infrastructure, as well as human resources and new kinds of skillsets and competencies. Universities must start training students to work in the anti-corruption agencies of the future. On the integrity of the data, she mentioned that agencies are starting with new data that they are building from the ground. These are the cases, the investigation reports, the resolutions. This all provides an opportunity for agencies to build intelligence data.

The mutual co-operation game – the impact of state and non-state actors in mitigating the risk of corruption in development

Samuel Bwana, Manager, Integrity Vice Presidency, World Bank Group, Washington DC, US

Mr Samuel Bwana emphasised the critical need for co-operation between state and non-state actors in fighting corruption. While both parties share the same goal, their efforts are often fragmented due to mistrust, duplication and lack of co-ordination. This unfortunate divide can be cured through mutual co-operation, which, he said, is 'the game'. Fighting corruption is beyond borders. The presenter advocated for a unified framework to align strategies, pool resources and build trust, emphasising that such collaboration is essential for sustainable anti-corruption outcomes. The critical roles the mutual parties play in addressing corruption cannot be denied. Yet the effectiveness of these roles is often hindered by fragmented efforts and mistrust. The pivotal roles played by both state and non-state actors in anti-corruption must be recognised. There is a need, therefore, for joint initiatives such as:

- Integrated awareness campaigns. Instead of separate programmes, stakeholders can co-ordinate outreach initiatives, pooling resources for greater impact.
- Centralised monitoring and reporting systems.
- Collaborative capacity-building efforts.

- Implementation of transparency and accountability initiatives, including open data policies, judicial reforms, mandatory disclosures, whistle-blower protections and e-governance systems to enhance public oversight.
- Whistle-blower protection that stakeholders can provide jointly.
- Technology and data sharing.



Samuel Bwana, Manager, Integrity Vice Presidency, World Bank Group, Washington DC, US

If state and non-state actors came together and collaborated in drafting anti-corruption policies, that would ensure alignment to prevent redundancy of efforts, leading to success.

Challenges

- Trust deficits: Long-standing tensions and mutual suspicion limit collaboration.
- Fragmented efforts: Independent efforts lead to duplicated initiatives and wasted resources.
- Inconsistencies in legal frameworks: Varying laws and enforcement practices across jurisdictions hinder effectiveness.
- Risk of collusion: Some non-state actors can be compromised, weakening the anti-corruption drive.
- Weak public confidence: Disjointed actions create confusion and erode trust in anti-corruption programmes.
- Poor co-ordination: This can result in multiple actors targeting the same issues without synchronisation.
- Different priorities: It is important to harmonise priorities.

Key takeaways

- Mutual understanding and alignment of incentives are crucial for sustainable impact.
- Collaboration yields efficiency by eliminating duplication and increasing outreach.

- Trust-building is foundational; it must be nurtured through transparency, shared successes and inclusive engagement.
- Technological tools (AI, blockchain) enhance detection and reduce corruption risks when used collaboratively.
- Protecting whistle-blowers is a core component in uncovering corruption.

Recommendations

- It is important to develop structured collaboration frameworks with clearly defined roles, responsibilities and engagement protocols.
- Agencies should conduct stakeholder mapping to eliminate overlaps and duplication of efforts.
- Agencies need to pool joint resources and expertise for greater effectiveness in success of initiatives.
- It is important to enhance transparency through open data initiatives and increase visibility and accessibility of government operations and services.
- Agencies should foster continuous dialogue by establishing platforms for regular engagement and strategic alignment.
- They should encourage ethical behaviour through rewards and recognition incentives like clean business certifications for anti-corruption efforts.
- There is a need to strengthen legal harmonisation and work toward consistent anti-corruption legislation across borders.
- It is important to enhance international co-operation by facilitating global information-sharing and joint enforcement efforts.
- Agencies should foster dialogue through multistakeholder platforms for regular and continued engagement.
- Monitoring and reporting, capacity building and pooling resources should be done together.
- Agencies should create collaborative frameworks.
- It is important to sign MoUs and carry out stakeholder mapping.

The roles the mutual parties play in addressing corruption are critical. The effectiveness of these roles is often hindered by fragmented efforts and mistrust. But if the incentives of diverse stakeholders are properly aligned, collaborative anti-corruption strategies can yield sustainable outcomes.

Gender and corruption

Prof. Sope Williams, Faculty of Law, Stellenbosch University, South Africa

Prof. Sope Williams's presentation explored how gender intersects with corruption, affecting how it is experienced, perpetrated and addressed, with major implications for governance, equity and policy design. The presentation explored the intersection of gender and corruption, examining how men and women experience and perpetrate corruption differently. It highlighted the systemic impact of corruption on women, particularly in developing contexts, and called for gender-sensitive anti-corruption policies. She mentioned that policies and laws are not gender neutral and the anti-

corruption framework needs to respond to this fact. Gender and social norms impact corruption. In terms of exposure, due to the differing gender roles, the experiences are therefore different. Women face and experience corruption differently to men.



Prof. Sope Williams, Faculty of Law, Stellenbosch University, South Africa

The presentation unpacked the following key themes:

1. Differential exposure to corruption

- Women often encounter corruption in service sectors like:
 - healthcare (for example, bribes for treatment)
 - education (for example, 'sex for grades')
 - housing (for example, bribes or 'sextortion' for access).
- Men more frequently encounter corruption in law enforcement and contracting.
- Patriarchal norms exclude women from corrupt networks and legitimate power. Their limited access to power does not necessary mean they are less corrupt.

2. Gendered forms of corruption

- Sextortion: A form of corruption involving sexual favours in exchange for services or opportunities.
 - Sextortion is underreported due to stigma and the structure of anti-bribery laws.
 - It is common in law enforcement, immigration, education, sport and procurement.

3. Impact on women entrepreneurs and employees

- Women-owned businesses face more bribery demands, limiting growth and profit.
- Corruption restricts access to finance, markets, public contracts and legal recourse.
- In the workplace, corruption undermines advancement and increases attrition.

4. Gender bias in anti-corruption strategies

- Whistleblowing channels are often unsafe for women, despite women being more likely to report corruption when anonymous. They experience greater backlash with high risks and consequences for reporting.
- Gender-blind reforms can perpetuate exclusion.

5. Corruption as a barrier to empowerment

- Corruption limits women's access to politics, property rights, business and justice.
- Women in public office can reduce corruption by:
 - disrupting corrupt networks
 - promoting accountability
 - creating inclusive institutions.

In her closing, Prof. Williams proposed the following solutions and recommendations:

- Designing gender-sensitive anti-corruption strategies.
- Addressing underlying social norms and power imbalances.
- Improving access to safe reporting mechanisms.
- Research and education, which are essential for lasting reforms.

Questions and Discussions

Reflecting on the presentation, Adv. Kohn indicated that for her, the takeaway was not so much that it is women who are facing gender bias when it comes to corruption but the fact that women are part of the fix. Her question was how do we improve women being the solution, and in doing that, how do we ensure that women who are the fix make space for other women? Women need to encourage other women; how can that be achieved?

The second question was more a comment on a personal struggle to source funding for a gender and corruption symposium the speaker was hosting. She mentioned that gender and corruption is an under researched area; it is often a neglected area.

The third question was also a comment on the speaker's observation that women are good leaders. She said that unfortunately they seem to be their own enemies, they do not support each other; instead they will pull each other down. There is a need to sensitise women to recognise the roles that fellow women can play, especially in senior public positions.

The fourth question was around how transgender was addressed in this research.

On the issue of women not supporting each other, Prof. Williams in her response mentioned that we live in a patriarchal world and women are also agents of the patriarchy. When they do what they do to other women, they are unconsciously doing what they are socialised to do. On the issue of transgender, she explained that in the studies on gender and corruption, people who are non-binary (the LGBT+ community) also face specific risks, more violent forms of corruption than either men or women. The solution to this will be to build systems that are fair to every gender. They will cater to everybody who is human, irrespective of how they identify.

Day 2: Tuesday 6 May 2025

The session was chaired by the hosting head, Adv. Andy Mothibi (Special Investigating Unit, SIU), who introduced the Former Chief Justice Zondo. In his remarks, he acknowledged the presence of Prof. Firoz Cachalia, Chairperson of the National Anti-corruption Advisory Council (NACAC). The Hon. Chief Justice's career highlights include his appointment as the judge of the Labour Court in 1997, while in 1999, he was appointed to the Transvaal Provincial Division of the High Court and later the North Gauteng Division of the High Court. In the year 2000, Former Chief Justice Zondo was elevated to be Judge President of the Labour Court. In 2010, he returned to the Pretoria High Court, and in 2011–2012, was acting judge of the Constitutional Court. He was appointed as the Chief Justice in 2022. He chaired the Zondo Commission of Inquiry into State Capture in 2018. In June 2022, the commission issued its final report, with all law enforcement agencies concerned with implementation of the recommendations. Emanating from the work of the commission, approximately R12 billion was recovered. In August 2024, Former Hon. Chief Justice Zondo retired.

Address by the former Hon. Chief Justice Zondo, c/o Constitutional Court of South Africa, Braamfontein, South Africa

Is our fight against corruption in South Africa more effective now than it was before the State Capture Commission?

Former Chief Justice Zondo noted that the conference came six weeks before South Africa completed three years since the submission of the commission report on 22 June 2022 to the Hon. President, Cyril Ramaphosa. It was part six of the State Capture Commission report and a culmination of about five years of hard work by the commission, which included investigators and evidence leaders. For three months, they worked without pay, but they never stopped working, looking at the urgency and importance of the work of the commission to hold people to account. Chief Justice Zondo said it was appropriate to look at the country's fight against corruption after the State Capture Commission and compare it with efforts before to assess effectiveness.



Three years after the Commission, he noted, the fight should not be as ineffective as before and should be a lot better.

During her farewell in August, Minister Simelane-Nkadimeng said:

'I am saying this because, in truth, the history of South Africa is now, and will forever be, divided into two chapters.

The Pre-Zondo Commission as the first chapter and the Post-Zondo Commission as the second chapter.

We must all work to close and never reopen the first chapter. This is a chapter of state capture, corruption and fraud in the public sector. It is a chapter of no accountability and impunity. It is a chapter of no consequences for the looting of state resources.

The second chapter is built on the findings and recommendations from the Zondo Commission of Inquiry into State Capture. State capture, corruption and fraud in the public sector must never be repeated. Most importantly, this chapter provides a toolkit on how to deal with corruption, wrongdoing and malpractice. This is an opportunity to open the window for consequence management and close a curtain on the deplorable culture of impunity.'

She also said:

'As we bid farewell to Chief Justice Zondo, we make a solemn commitment that the recommendations from the commission that took so much of his time and public resources will never have been in vain. The recommendations of the Zondo Commission will be implemented without fear or favour. Justice will be done even if it means heavens must fall.'

Justice Zondo implored that what the minister was saying was that post the commission, we must be better and more effective in the fight against corruption than before. He stated that some offices were more effective before the commission, and those that were less effective must fight more. He said the country must ask 'is our fight against corruption in South Africa more effective now than it was before the State Capture Commission?'

Before the commission completed its work, it was revealed that about R12 billion of taxpayers' money was unaccounted for, with the SIU being at the forefront of recovering that money. Most people accept that the commission added a lot of value in the fight against corruption. Agrizzi's evidence on how Bosasa captured the Department of Correctional Services, sparked such interest in South Africans.

Former Chief Justice Zondo reminded the conference of the words of Kofi Annan (Secretary-General, UNCAC):

'Corruption hurts the poor disproportionately – by diverting funds intended for development, undermining a government's ability to provide basic services, feeding inequality and injustice, and discouraging foreign aid and investment. Corruption is a key element in economic underperformance, and a major obstacle to poverty alleviation and development.'

Justice Zondo also quoted the words of Willem Heeth:

'Corruption and maladministration are inconsistent with the rule of law and the fundamental values of our Constitution. They undermine the constitutional commitment to human dignity, the achievement of equality and the advancement of human rights and freedoms. They are the antithesis of the open, accountable, democratic government required by the Constitution. If allowed to go unchecked and unpunished they will pose a serious threat to our democratic state.'

He went on to ask, how could South Africa see if the fight against corruption was more effective now than before? After the commission, the country had learned lessons and taken measures to ensure it did not go back 'to a culture of no accountability and to stop a culture of looting of state resources'.

Justice Zondo asked if there had been decisions made to put in place a strong regulatory framework. In his view, more than 70 per cent of serious corruption in South Africa took place in the procurement of goods and services by the state. Had South Africa taken measures to ensure that more people were incentivised as whistle-blowers? Had it put in place mechanisms and systems to encourage corruption reporting and to provide an environment of the appreciation of whistle-blowers' role in fighting corruption? Had the country done what should be done to ensure the electoral system encourages Members of Parliament to put people first and not put their individual interests or families first?

Public procurement

Justice Zondo reiterated that he believes that more than 70 per cent of serious corruption in South Africa happens in the area of public procurement. He said Adv. Mothibi might agree and based on his investigations, might even put the percentage higher as this is the SIU mandate. The commission made the recommendation that if procurement corruption was rooted out or brought down significantly, it would go a long way to solving corruption challenges in South Africa. According to the commission in Part 1, Volume 3 of the report submitted to the President in 2022, in 2017 the South African Reserve Bank (SARB) statistics revealed that the government channelled R967 billion through public procurement (19.5 per cent of gross domestic product (GDP)). International experience suggests that all government public procurement is vulnerable to fraud and corruption. A public procurement system will be fit for purpose if it is founded on good governance and good management and enforced through effective monitoring and oversight measures which ensure all accountability; anything less renders the system open to abuse.

The report looked at many instances where deviations from the cost effectiveness and transparency in procurement required by Section 217 of the Constitution were abused to engage in corruption. An example was Transnet, Eskom, SAA, Department of Housing in the Free State provincial government, despite the fact that the National Treasury was responsible for issuing instructions on when deviations could be used. Deviations appeared to be the norm, rather than the exception, resulting in unintended use of deviations contrary to Section 217 of the Constitution, Sections 38 and 51 of the Public Finance Management Act (PFMA) 'The report demonstrated the increased use of deviations. During the Gupta-Zuma period, sole source was a deviation from a competitive, transparent and cost-effective procurement process. The report indicates that sole source service provider is troubling to allow the sole sources to procure privately and claims to believe no second bidder will be invited. In view of the commission this exception is poorly conceived and invites abuse. Deviation from competitive bidding cannot be justified the time and incidental to go out to tender is necessary in the interest in good governance. When sole sourcing services, the procurement procedures should be followed to get the goods and services by inviting adequate service providers bidding for the service. According to the report there was a lot of evidence on how sole source was abused to ensure corruption. Section 217 of the constitution believing there is only one source and later find out you were mistaken- you have violated the constitution. The commission recommended that we have minimal violation to the constitution.

Justice Zondo continued to highlight that one of the recommendations by the commission was the **establishment of a single multifunctional and properly resourced anti-corruption authority** with a mandate to confront abuses inherent in the current system. The agency could be named the Anti-corruption Authority of South Africa. Such an agency would have a number of units such as an **inspectorate** with the role of monitoring, inspecting, detecting and exposing corruption in public procurement, implement electronic procedures, and undertaking site inspections where necessary. This was one of the commission's key recommendations to bring down the high level of corruption. The inspectorate would operate like 'traffic cops', coming into any department and reviewing all files related to procurement. It would receive whistle-blower information and arrive at any department before damage is done to halt the process. The Public Procurement Act of 2024 has provision for monitoring, but unfortunately this will be done by the National Treasury Procurement Office. This is not the same as the recommended multifunctional, independent and properly resourced anti-corruption unit recommended by the commission. He observed that this was a worry, as the escalation of corruption before the commission happened at the time when the National Treasury was tasked with the issuing of instructions for compliance. Corruption at this time was increasing with no one fighting it. However, he added that the SIU had been doing a great job, having been effective even before the commission. It is hoped that more agencies will be more effective as per the lessons learnt and revealed by the commission.

One of the commission recommendations around whistle-blowers recognised that South Africa needs to ensure criminals know that if they engage in corruption, their deeds will be exposed and they will be convicted with long-term imprisonment. They must know that whatever proceeds they may have gained will be recovered. The commission recommended improved measures for whistle-blowers, as they are crucial in exposing corruption and providing evidence to the commissioners. Incentivisation of genuine whistle-blowers is key, although it may be challenging to incentivise people who resist corruption. Best practice from other countries include legislations to provide rewards. Looking back at the work of the commission, part of what weakened the system was that Parliament did not do what it had to in terms of establishing public hearings for state capture.

Finally, Justice Zondo asked, how can a government make sure that in future a Head of State is never going to play a role like President Zuma in enabling state capture? How does South Africa ensure that its ethical standards are the right standards and are at the centre of effectively fighting corruption? How does it ensure that its agencies and organisations do not to appoint people who have been accused of corruption or with fraudulent qualifications? Otherwise, it sends a wrong message that a government is not serious about fighting corruption. He noted that the South African judiciary continues to be effective in playing its role against corruption, as this is the only arm of the state where its members can be ejected when found to be in the wrong, so maintaining ethical standards, even if the government's fight against corruption might not be effective, there are other actors in society that are doing an effective job, such as the SIU and the judiciary, which brought judgement on the Zuma matter.

Strategies and legal frameworks for improving the effectiveness of anti-corruption agencies

Francesco Checchi, United Nations Office on Drugs and Crime, Vienna, Austria

Francesco Checchi from the United Nations Office on Drugs and Crime (UNODC) presented on the effectiveness of anti-corruption agencies in relation to the UNCAC and relationships with state and non-state actors. By 18 November 2021, about 189 party states had been ratified as part of UNCAC. A map indicated on a slide categorised the countries as follows: state parties, signatories and countries that have not yet ratified the convention.



Francesco Checchi, United Nations Office on Drugs and Crime, Vienna, Austria

According to UNCAC and ACAs, Articles 6–36, the basis for development of many agencies, are available here. They: *'Require State parties to establish institutional framework (body or bodies) respectively for the prevention and law enforcement against corruption'*. Key to these articles is independence (collaboration and accountability). On a global scale, there is a deficit in independence due to appointed officials interfering with anti-corruption agencies.

The presenter reflected on the typical mandate of ACAs for policy and legal development, conducting research and analysis, how they engage in promoting awareness, their efforts in investing in prevention tasks (focused on risk assessments, prevention of corruption in public procurement), their handling of anti-corruption allegations, methods of conducting investigations by applying special techniques, the extent to which whistle-blowers are protected, and arresting and prosecuting the corrupt individuals, leading to asset recovery.

The use of the Jakarta Principles was applied to indicate how to promote the operational independence of ACAs. The speaker emphasised safeguarding the institutional and legal framework governing the mandate, power and resources. Key challenges here, he said, would be broad or overlapping mandates, lack of authority, and limited human resources to undertake the tasks to undertake high-level investigations. Most ACAs are weakened by the election processes for their leadership due to political influence. This may make them prone to removal of that leadership.

UNCAC encourages co-operation with civil society and the media, and this is supported by Article 10, which promotes transparency in public administration, and Article 13, which recognises the role of civil society in preventing corruption. Article 12 urges partnership with the private sector (non-state actors) to prevent corruption. To deal with bribery and corruption, the ACAs are supported Articles 15, 16, 21, 22. UNODC has various instruments in place to track the implementation of UNCAC in Africa, such as the GLOBE Network, STAR Network, STAR Asset Recovery, Global Forum for Asset Recovery (GFAR), GRACE (education) and the Global Judicial Integrity Network. During the interaction session, the presenter stressed the importance of independence and an effective judiciary in the fight against corruption.

Country presentation by Mauritius

Overview of the Financial Crimes Commission (FCC), Mauritius

I Rossaye, Acting Chief Communication and Public Relations Officer

Rossaye introduced the presentation by talking about the Financial Crimes Commission (FCC) Act 2023 (proclaimed on 29 March 2024). Its enactment was Mauritius major reform of its legal and institutional framework to fight financial crimes using a holistic approach.

This legislation establishes the Financial Crimes Commission (FCC) – the lead national agency responsible for detecting, investigating and prosecuting corruption, including foreign bribery, money laundering, fraud and the financing of drug dealing. The Act also puts in place a stronger asset recovery system within the function of the FCC.

The FCC's mandates are:

- detecting and investigating financial crimes, offences related to the financing of drug dealing, unexplained wealth and other offences under the FCC Act and the Declaration of Assets (DOA) Act 2018
- conducting investigations regarding asset recovery and for recovering and managing assets that are proceeds or instrumentalities, including terrorist properties, of offences committed under this Act and under any other enactment
- monitoring the assets and liabilities of any declarant under the DOA Act
- preventing and educating the public against financial crimes and any other offence under this Act and the DOA Act.



I Rossaye, Ag Chief Communication and Public Relations Officer

Achievements

The speaker went on to highlight some achievements, noting the implementation of the **New Financial Crimes Legal and Institutional Framework** had taken place to address more complex and sophisticated financial crimes, making this intervention a timely challenge to the crimes.

Examples of high-profile cases were provided, such as the MIC case (an investigation into the former Minister of Finance, the former Governor of the Bank of Mauritius and the CEO of the state-owned entity. These were charged as fraud cases under the FCC Act 2023. There was also the Patel case, involving cash found in suitcases totalling R4,700,000 and \$200,000.00 which was in violation of the Financial Action Task Force (FATF) and therefore resulted in a charge of money laundering.

The FCC is mandated to investigate: fraud offences where the money involved or the property, benefit or financial loss are valued at more than 500,000 Mauritian rupees (MRs) (Sections 39–44); financing of drug dealing where the money involves amounts more than MRs500,000 (Section 45); all money laundering offences (Sections 36–38); all corruption offences (Sections 19–35); all other offences under the FCC Act (Sections 46–51); and all offences under the Declaration of Assets (DOA) Act. The Act also provides for different sanctions depending on the type of offence.

Mr Rossaye said the coming into force of the FCCA 2023 had also brought major reform to the institutional framework. The Education and Preventive Division (EPD) under Section 5(1)(c) is responsible for preventing and educating the public against financial crimes and any other offence under this Act and the Declaration of Assets Act 2018. The EPD is responsible for raising awareness and education on financial crimes, overseeing implementation of recommendations by public bodies, conducting regular assessments, monitoring compliance, and others. He said it had built strong partnerships at the local and international levels by engaging in MoUs with relevant bodies.

Country presentation by Uganda

Inspector General of Government overview

Magazi Joram, Director for Leadership Code, Inspectorate of Government (IG), Uganda

The presenter, Magazi Joram, said the Inspectorate of Government had been established under Chapter 13 of Uganda's Constitution with its core mandate being to prevent and fight corruption. Its functions include anti-corruption, acting as the ombudsman and Leadership Code enforcement.



Magazi Joram, Director for Leadership Code, Inspectorate of Government (IG) Uganda

Achievements

He highlighted some achievements of Uganda's new strategy, which included the following.

- It has shifted focus to tracking illicit wealth.
- It puts emphasis on compliance with the Leadership Code by emphasising leaders' declaration of their income, assets and liabilities with a timeline of three months and this taking place every two years. All public servant declaration is 3 months and 5 years, with punishment for non-compliance. He said it had been reported that compliance rates had improved.
- The strategy emphasises public mobilisation and encourages public participation to report leaders' assets and engage in public education programmes in schools and hospitals.
- It uses verification tools that highlight high-risk declarations, and flags declarations with income and liabilities to save time during verification.

- It engages volunteers and interns to trace and locate assets, and compile reports for prosecution and tribunal action.

Challenges/lessons learnt

The speaker observed that during the previous year, the following challenges were noted: corruption persisted despite the legal framework; the secretive nature of bribery was a challenge; grand corruption took place involving policy-makers and implementers; corruption was difficult to detect, prevent and prosecute; and Uganda's Corruption Perception Index by Transparency International was 26–27 per cent.

Recommendations

In future the Inspectorate of Governments wishes to focus beyond the investigation and prosecution, and to emphasise Leadership Code enforcement – that is, verifying assets and reducing leaders' appetite for illicit enrichment.

Country Presentation by South Africa **Overview of the Special Investigating Unit (SIU)**

T Mkhungo, Chief Risk Officer, SIU

The presentation for the Special Investigating Unit (The SIU) was delivered by the Chief Risk Officer, T Mkhungo. The Special Investigating Unit is an independent statutory body that was established under the Special Investigating Units and Special Tribunals Act, Act No.74 of 1996 ('the SIU Act').

The primary mandate of the SIU is to investigate serious allegations of corruption, malpractice and maladministration in the administration of state institutions, state assets and public money, as well as any conduct which may seriously harm the interests of the public, and to recover any financial losses suffered by state institutions through civil litigation. The SIU is empowered to take civil action to correct any wrongdoing it uncovers in its investigations.



T Mkhungo, Chief Risk Officer, SIU

SIU investigations are dictated by the issuing of a Presidential Proclamation, and then to institute civil litigation proceedings either in a Special Tribunal or a High Court for the prevention or recovery of financial losses suffered by the state. Once the investigation is completed, a final report is submitted to the President with an overview of the investigation and its findings, as well as the various recommendations made and their outcomes.

The SIU receives allegations either through its whistle-blower hotline, which is managed by an independent service provider; directly from state institutions themselves; or alternatively through direct approaches from whistle-blowers, be it through walk-ins, telephone calls or emails.

The SIU has powers to subpoena witnesses, bank statements and cell phone records, search, seize evidence and interrogate witnesses under oath, and to litigate on behalf of the state. In line with the SIU Act, the SIU refers evidence pointing to criminal conduct uncovered during its investigations to the attention of the National Prosecuting Authority (NPA) for prosecution.

Achievements

The speaker went on to highlight that over the past year, the SIU had introduced a lifestyle audit conducted for departments, government entities, the Department of Public Works, Electricity Supply Commission (Eskom), the Passenger Rail Agency of South Africa (**PRASA**), the Gauteng Office of the Premier, the Housing Agency, and for Human Settlement in the Free State. This initiative focuses on assessing unexplained wealth, with the process including non-vetted chief financial officers (CFOs).

With the focus on vulnerable sectors, the SIU is part of the **National Priority Crime Operations Committee (NPCOC)**.

The whole of society approach to fighting corruption, as stipulated in the National Anti-corruption Strategy (NACS), is being implemented by the SIU with the establishment of four anti-corruption forums as a strategic intervention. This is in support of pillar six of the NACS. Corruption Vulnerable Sector Risk Assessment was conducted in the health sector, for local government, and for infrastructure/construction. The unit has plans underway to launch two forums per annum. The presenter said that the board management forum had been recently launched, and plans were underway to launch a forum for the Department of Water and Sanitation. He reflected on the key stakeholders like the law enforcement agencies, Chapter 9 institutions, civil society, the private and public sectors, religious and traditional leaders, and organised labour.

The SIU presented its 'game changer' – the draft National Corruption Risk Management and Prevention Framework, compiled into five parts. Part A focuses on background; Part B its processes and organisational structures for implementing the framework; Part C is the expansion of the risk assessment and the roles and responsibilities of all role players; and, finally, Parts D and E of the framework include the monitoring and evaluation (M&E) of the interventions.

The SIU prides itself with its data-led investigations with the use of data analytics tools for innovation, which are also linked to vulnerable sectors where trends analysis reports are developed for predictive modelling and prevention of corruption. The use of different models, such as classification, clustering and network analysis, assists in picking up risk exposures in the sector.

The last innovation presented was the prevention, awareness and advisory element, which focuses on public education, and engaging state departments through targeted awareness sessions to ensure that systemic improvement plans are developed and implemented to improve the control environment and effectively combat corruption.

Questions and Discussions

Professor Hosea asked to what extent the government took the Zondo report into consideration?

The response was that a comprehensive implementation plan had been presented to Parliament on the progress (timelines monitored), various aspects in that plan (70 per cent of the corruption is in procurement – ‘that’s where the money is’), and various recommendations were being executed by different departments. For example, the public procurement custodian is the National Treasury, which drafted the Procurement Act that was signed. The presenter said that they continued to monitor recovery and investigations. The NPA takes care of prosecution, while the SIU takes care of the recoveries, with up to R12 billion being recovered. On the anti-corruption detection recommendation for a single action agency, the speaker said Professor Cachalia was leading the work of the commission to look at reviewing anti-corruption architecture. This work would make recommendations to the President.

Transparency International asked what we could all learn from all countries? What opportunities and challenges exists in different countries?

DPSA as a custodian of Policies and all public servant and lifestyle audit is linked to them – challenges of refusal and the DPSA will enforce its policy to assist with lifestyle audit.

International co-operation in anti-corruption matters – building networks and removing barriers

Dr Roger Koranteng, Head, Public Sector Governance, Commonwealth Secretariat, London, UK

This session was delivered by Dr Roger Koranteng, who stressed the importance of international co-operation in a quest to combat transnational crimes. Key strategies he focused on were the need to build networks and remove barriers to co-operation. In building networks, Dr Koranteng emphasised the need to establish central authorities, regional/international networks, and to concentrate on capacity building by providing training. To remove barriers, he advised that procedures needed to be simplified, while agencies should improve their communication and address legal differences.

Challenges faced in international co-operation include legal and procedural differences (diverse legal systems and varying standards in different countries), political and diplomatic barriers (such as sovereignty concerns and political tension), and lack of direct contacts between authorities. Language barriers also cause communication and co-ordination issues. Resource constraints in many countries also pose a great challenge. In this technological era, cybercrime and data privacy pose security issues. In fighting corruption, African countries are further challenged by partisanism, lack of visibility, the cost of recovering assets, evidential burden and a lack of political will.



Dr Roger Koranteng, Head, Public Sector Governance, Commonwealth Secretariat, London, UK

Dr Koranteng said that mechanisms for addressing the challenges in international co-operation include legal frameworks and agreements such as the multilateral conventions, and bilateral and regional agreements. Central authority networks – such as INTERPOL, AAACoA, AAACA and GlobE – can assist in facilitating information sharing and co-ordination. Agencies require technological tools like digital platforms and special expertise from cybercrime units to handle information. As alluded to previously, he observed that capacity building and training are key and can be addressed by introducing specialised workshops and seminars. Legislative reform is important for harmonisation of laws. Lastly, he said, addressing these challenges requires authorities to be improving communication and co-ordination by creating direct contacts and providing translation services where language is a barrier.

Country presentation by Zambia

Overview of the Anti-Corruption Commission of Zambia

Monica Chipanta Mwansa, Deputy Director-General, Anti-Corruption Commission, Zambia

In 2024, as part of its innovation, the Anti-Corruption Commission of Zambia focused on the rollout of the Zambia Bribe Payers Index (ZBPI) survey. The theme of the survey report, the speaker, Ms Monica Chipanta Mwansa, explained was 'Corruption in the Decentralization Process with a focus on the Constituency Development Fund (CDF) implementation'. The survey has existed since 2012 and is conducted every two years; respondents were from households. The CDF scope is inclusive across all groups in the society such as youth, women, communities and service delivery projects.

The Zambian Government uses the ZBPI as a corruption measurement tool to assess the probability and prevalence of bribery experiences in public and selected areas of the private sector. The tool is focused on public officials who are prone to bribery on a daily basis as they interact with members of society, public perception, and stakeholder anti-corruption actions.



Monica Chipanta Mwansa, Deputy Director-General, Anti-Corruption Commission, Zambia

The survey was implemented jointly with Transparency International Zambia and the Anti-Corruption Commission and covered 20 districts across 10 provinces.

Findings

- There is adequate awareness of the CDF.
- There is political influence during project selection.
- Communities have a low rate of participation (especially women and youth).
- Rural communities are more prone to bribery.
- Legal cases experience a high level of delay.

Challenges/lessons learnt

- The country is experiencing improvements in the rule of law and control of corruption. Good governance improved by 28% in 2024.
- Strengthening anti-corruption mechanisms in rural areas and ensuring equitable access to public services is crucial.
- People in rural areas often have no choice but to pay bribes – they risk losing essential services if they refuse.
- Vulnerable groups, including women and persons with disabilities, are disproportionately affected by corruption – deepening social inequalities.

Recommendations

- There is a need to enhance CDF information communication and sensitisation.
- The commission must sensitise members of communities on the importance of participating in CDF community project identification, and on applications for empowerment grants, loans, skills development or secondary school boarding bursaries.
- The commission should develop strategies that will improve community participation in Ward Development Committees in urban areas.

- It is important to scale up anti-corruption interventions that have a low probability of experiencing bribery.
- The commission should develop mechanisms that enforce provisions of service delivery duration in service charters.
- There is a need to undertake social norms research to identify whether individuals engage in corruption because of social issues.
- The commission should interrogate the cost of penalties and sanctions from a behavioural perspective.

Country presentation by Namibia

Overview of the Anti-Corruption Commission of Namibia

Paulus Noa, Director-General, Anti-Corruption Commission, Namibia

Paulus Noa commenced the presentation by noting that the Anti-Corruption Commission (ACC) in Namibia had taken significant steps in combatting corruption and was established under the Anti-Corruption Act 2003. The ACC investigates, educates and prevents corruption. It conducts corruption risk assessments (CRA) to identify and mitigate risks and implements the National Anti-Corruption Strategy and Action Plan (NACSAP). There are key legal frameworks used in Namibia to fight corruption, namely:

- Prevention of Organised Crime Amendment Act, 2023 (Act No.9 of 2023)
- Criminal Procedure Amendment Act, 2023 (Act No.7 of 2023)
- Companies Amendment Act, 2023 (Act No.4 of 2023)
- Close Corporations Amendment Act, 2023 (Act No.5 of 2023)
- Financial Intelligence Amendment Act, 2023 (Act No.6 of 2023)
- Police Amendment Act, 2023 (Act No.2 of 2023)
- Extradition Amendment Act, 2023 (Act No. 2 of 2023)



Paulus Noa, Director-General, Anti-Corruption Commission, Namibia

- International Co-operation in Criminal Matters Amendment Act, 2023 (Act No.12 of 2023)

Achievements

The focus of the presentation was based on the innovative measures that the commission had implemented to combat corruption in Namibia. Reporting of corruption and the speed of completing cases had improved to reduce the backlog drastically.

As with other agencies, the speaker observed, the commission had introduced prevention initiatives such as an anti-corruption awareness campaign to facilitate public education through the media and different workshops for both the public and private sectors.

It had compiled an anti-corruption education manual for teachers targeted to instil good values in youth from an early age, from Grades 4 to 12. The commission had trained 38 institutions from the public sector on ethics and integrity. Another game changer was the corruption risk assessment to assess institutions internally and externally.

Challenges/lessons learnt

The speaker noted challenges, stating that aligned to the initiatives listed above, the ACC was faced with budgetary constraints and the poaching of staff by other institutions. The commission had reflected on lessons learnt to recognise the key role played by civil society and the private sector, necessitating collaboration; the need to improve its effectiveness through legal reform; the need for emphasis to be put on public education to change societal attitudes towards corruption, involving youth; and the importance of ensuring accountability by monitoring the initiatives. The impact of its risk mitigation plans was measured through M&E.

Namibia had implemented the National Anti-Corruption Strategy and Action Plan (NACSAP) aligned to its Vision 2030. The country commemorated anti-corruption days such as the Africa Anti-Corruption Day (11 July 2024) and International Anti-Corruption Day (9 December 2024).

Recommendations

The presentation was concluded with Mr Noa detailing recommendations to address the challenges faced by strengthening existing measures, and increasing collaboration and exchange of information with Commonwealth counterparts. The commission requires continuous capacity building and, lastly, to engage more stakeholders.

Country presentation by Mozambique

Enhancing inclusive participation of state and non-state actors to prevent and combat corruption

Nazimo Mussa

The Republic of Mozambique Public Prosecutions Central Anti-Corruption Bureau was represented by Nazimo Mussa, who delivered the presentation. He said that to strengthen the fight against corruption and expand the prosecution mandate in Mozambique, Law No. 6/2004 was approved in 2004 by the Central Anti-Corruption Bureau (GCCC), linked to the Attorney General's Office.

Achievements

Over the previous year, the GCCC had adopted innovative measures for both state and non-state actors to fight corruption. The interventions were as follows.

- Strategy for Preventing and Combating Corruption in Public Administration (EPCCAP) (2023–2032). This strategy is a multifaceted approach to prevention, promoting integrity, encouraging transparency and access to information for citizens, promoting the active participation of civil society, and strengthening internal control.
- Creation of Focal Points in public and private entities to monitor sectoral plans and encourage collaboration.
- Establishment of anti-corruption centres. In partnership with the Attorney General, the centres are implemented in schools to combat corruption and nurture a culture of integrity.
- Participation of the private sector, civil society and inter-institutional collaboration.
- Strengthening the legal framework. This included the review and approval of key anti-corruption laws.



*Nazimo Aly Mussa, Prosecutor and Deputy Anti-Corruption Bureau's Director,
Anti-Corruption Bureau, Mozambique*

Challenges/lessons learnt

The speaker observed that engaging state and non-state actors, to ensure autonomy, no undue influence and protection of whistle-blowers, remained a challenge for the GCCC. In the private sector, key challenges are the lack of transparency in reporting, identifying and combatting corruption in complex transactions and tolerance for corrupt practices. Integrity is a challenge where corruption practices are normalised and go unpunished.

Recommendations

The GCCC recommended that existing corruption busting measures should be enhanced. There is also a need to strengthen collaboration for non-state actors, with the private and new sectors playing a more prominent role in fighting corruption. Investment into resources to roll out anti-corruption campaigns at a large scale is crucial and, most importantly, there should be the uniform application of legal mechanisms.

Country Presentations by Ghana

An overview of the Economic and Organised Crime Office (EOCO)

Bashiru Abdulai Dapilah, Acting Executive Director, Economic and Organised Crime Office, Ghana

The Economic and Organised Crime Office (EOCO) is a body in Ghana focused on curbing fraud and corruption. The presentation focused on enhancing inclusive participation of state and non-state actors to combat corruption. Bashiru Abdulai Dapilah noted that collaboration is crucial in addressing economic and organised crime. With the changing face of corruption, the EOCO is engaged on innovative measures that will curb corruption and economic crimes that use technology, such as the use of the cyberspace, digital wallets and electronic platforms by criminals. To achieve this, there is a need for investment into the cyber infrastructure to support the law enforcement agencies to respond.

The EOCO is central to Ghana's fight against economic crimes and collaborative, inclusive and tech-driven responses are key.

Achievements

The speaker emphasised that EOCO uses asset recovery as a deterrent to prevent criminals from enjoying illicit gains, while the Anti-Money Laundering (AML) Act lists money laundering as a key offence. Local collaborations with the Office of the Special Prosecutor (OSP), GPS, NIB, the Commission on Human Rights and



Bashiru Abdulai Dapilah, Acting Executive Director, Economic and Organised Crime Office, Ghana

Administrative Justice (CHRAJ), and NACOC had led to successful investigations, arrests and prosecution. International collaborations with partners such as the FBI, NCA, EFCC and RCMP had enabled international casework and recovery of assets. He said the agency had launched public education campaigns in schools between 2017 and 2024, in addition to partnering with the NCA-UK to launch cyber-fraud reporting.

Challenges/lessons learnt

As with other countries, Bashiru Dapilah went on, adequate funding is a thorny issue for providing anti-corruption initiatives. The agency relies on donor support, which affects its independence and sustainability. Communities view corruption as normal and this discourages whistleblowing and the effectiveness of public education campaigns.

The Office of the Special Prosecutor (OSP) overview

Sammy Darko, Director of Strategy, Research and Communications, Office of the Special Prosecutor (OSP), Ghana

The next presentation from Ghana was given by Sammy Darko, a representative of the Office of the Special Prosecutor. He said the OSP was created in 2018 by Act 959 and started operating in 2022 as a specialised anti-corruption agency with a mandate to investigate, prosecute, to do asset recovery and, lately, to engage in prevention approaches.

Achievements

The speaker said the OSP had implemented a three-pillar intervention strategy to curb corruption in Ghana, which focused on the following.

- Pillar 1: Enforcement with a focus on arresting voters and politicians, including issuing wanted posters for vote buyers and sellers under the slogan 'we will come after you'.



Sammy Darko, Director of Strategy, Research and Communications, OSP, Ghana

- Pillar 2: Engagements which involve meetings with political parties and media briefings.
- Pillar 3: Education focused on sending anti-corruption messaging to the youth using social media platforms and awareness campaigns to first-time voters.

Challenges/lessons learnt

On the topic of electoral corruption, Mr Darko said the exponential cost of elections was equivalent to 12 years of salaries for Members of Parliament. This facilitates corruption using overinflated contracts post-election. The risk is brought about by the country's weak laws to regulate political party funding and inadequate public funding, which creates an entry point for actors involved in illegal mining and illicit economies.

Challenges include weak inter-agency co-ordination, no formal MoUs, lack of co-operation from parties and isolation from law enforcement.

Recommendations

The speaker said that it was recommended to address these challenges by the country introducing comprehensive regulation of campaign financing to encompass both individual candidates and political parties.

Overview of the Commission on Human Rights and Administrative Justice (CHRAJ)

Stephen Azantilow, Director, Anti-Corruption Department, CHRAJ, Ghana

The third presentation from Ghana provided an overview of the **Commission on Human Rights and Administrative Justice (CHRAJ)** – an independent governmental organisation charged with safeguarding human rights and investigating human rights abuses in the country. It was established in 1993 by Act 456 of the Parliament of Ghana, as directed by Article 216 of the 1992 Ghana Constitution.



Stephen Azantilow, Director, Anti-Corruption Department, CHRAJ, Ghana



Dr Joseph Whittal, Commissioner, Commission on Human Rights and Administrative Justice

The speaker highlighted that CHRAJ had implemented the following innovative strategies to combat corruption.

Evaluation of National Anti-Corruption Action Plan (NACAP 1). This evaluation focuses on providing synergy between the NACAP and UNCAC Article 5(3). Ten steps were adopted for the evaluation. The scope of the evaluation of NACAP 1 focused on the conceptualisation, design and development phase and NACAP implementation between 2025 and 2024. The key objectives of the evaluation were progress reports, to assess NACAP's operations, identify external determinants and to assess the extent of implementation and the evaluation criteria followed.

Formulation of NACAP 2. Committee members were appointed, engagement with international partners and government was carried out and a working group was appointed.

Challenges/lessons learnt

The presenter noted some challenges, including limited broader consultation, lack of a strong monitoring and co-ordination system, and the role of the media, civil society and ordinary citizens.

Recommendations

CHRAJ recommends that there is a need for a sustainable budget for the NACAP, stronger political action, inclusive community engagement and capacity building.

Day 3: Wednesday 7 May 2025

Mozambique's Tuna Bond fraud and the English Commercial Court's combatting of corruption

Sarah Gabriel and Jonathan Tickner, Peters & Peters Solicitors LLP, London, UK

Sarah Gabriel and Jonathan Tickner presented on the topic of Mozambique's journey in tackling the Tuna Bond fraud, stating that it demonstrated both the immense challenges and important progress in fighting large-scale corruption. One of the critical issues faced in this context is the problem of sovereign immunity, which often makes it difficult to hold corrupt actors accountable and to pursue meaningful asset recovery.

Despite these obstacles, they said, Mozambique had shown commendable determination in combatting corruption, and there were strong indications that this commitment would continue. The country's fight against corruption had not been easy, especially given the involvement of state officials who were corrupted by service providers and received bribes in exchange for facilitating fraudulent deals.



Sarah Gabriel, Peters & Peters Solicitors LLP, London, UK

It was also noted that the expenses related to the fraudulent activities were not properly recorded in the national budget, pointing to deep governance weaknesses. In such circumstances, the participation of non-state actors, especially private sector lawyers, becomes essential. At Peters & Peters, they said they had aided countries around the world in fighting corruption. Their role often involves working closely with governments to freeze stolen assets and support legal proceedings.

Asset recovery is a difficult and lengthy process. It is time-consuming, can be expensive and frequently crosses national borders, adding legal and logistical complexity. When assets are taken, the immediate step is to report the issue. It is important to recognise that lawyers may not recover the money directly, but what they can do is secure court orders to freeze the assets, preventing them from being further dissipated.

A key recommendation going forward, observed the presenters, was the development of a robust asset recovery framework. This must include collaboration and sharing of ideas between governments, private actors and international institutions. Such partnerships improve the chances of success in freezing and eventually recovering stolen assets.



Sarah Gabriel and Jonathan Tickner, Peters & Peters Solicitors LLP, London, UK

One of the major lessons from the Mozambique case is that pursuing asset recovery without proper planning can be ineffective. A pre-assessment of the situation is critical, especially when considering jurisdictional limitations and the legal environments of the countries involved. Asset recovery is not just a legal exercise, it also requires experience, knowledge and strategic thinking to navigate the complex international landscape.

The speakers noted there were also challenges related to privacy and language barriers. The English courts, for instance, faced issues in understanding court records from Mozambique due to translation problems. Moreover, the privacy of proceedings often hindered access to important details.

Nevertheless, Mozambique did achieve notable success through settlement agreements. Some prosecutions were even televised, increasing transparency and public engagement. One of the perpetrators was arrested in South Africa, showing that international co-operation is possible and effective.

Questions and Discussions

A question by Enock Qoma, SIU, asked how agencies could then adopt a comprehensive approach that would include the MOUs of different countries. The answer was that this was something related to the government and not lawyers, so it was something the presenters could not comment on.

Country presentation by Kenya

Farida Kokita and Mr Mohamud Abdi, Ethics and Anti-Corruption Commission (EACC), Kenya

The next presentation came from Kenya's Ethics and Anti-Corruption Commission (EACC) – a constitutional commission established pursuant to Article 79 of the Constitution of Kenya. The presenters explained that EACC is the lead agency in the fight against corruption in Kenya. The speakers outlined how the commission comprises a chairperson and four (4) members. Its operations are supported by the Secretariat, which is led by the Secretary/Chief Executive Officer, who serves as the accounting officer and is responsible for the day-to-day management of the commission. EACC has its headquarters in Kenya's capital, Nairobi, and operates in 11 regional offices.

The commission's key functions include law enforcement, investigation, asset recovery, disruption of corruption networks, undercover operations and ethics enforcement. It also promotes standards and practices in ethics and integrity through advisories, cautions, notices and self-declaration forms. In corruption prevention, the commission carries out corruption risk assessments, systems examinations and offers advisory services while promoting ethics and leadership standards. Through public education and awareness, EACC undertakes trainings, sensitisation, media outreach, and supports the formation and operation of integrity clubs.



Farida Kokita, Ethics and Anti-Corruption Commission (EACC) Kenya

The speakers observed that the Ethics and Anti-Corruption Commission (EACC) is currently implementing its Third Strategic Plan for the period 2023–2028 and had prioritised three strategic innovations: monitoring of capital-intensive projects, enhanced focus on bribery at service delivery points, and asset recovery and forfeiture of unexplained assets. These projects involve significant public investment and are particularly vulnerable to corrupt practices because they involve large budgets, multiple contractors and complex procurement processes mostly implemented over multiple financial years. Examples of capital-intensive projects include infrastructure development, energy, water, health and housing.

To effectively monitor these projects, EACC engages in inter-agency collaboration with institutions such as the Financial Reporting Centre (FRC), Office of the Auditor General (OAG), Public Procurement Regulatory Authority (PPRA) and Business Registration Service (BRS) to share intelligence and co-ordinate monitoring efforts.



Mohamud Abdi, CEO, EACC, Kenya

Additionally, in the prevention component, the commission collaborates with responsible institutions to identify potential loopholes for corruption and recommend preventive measures to mitigate identified risks and enhance internal controls during project implementation.

EACC also conducts project-based investigations, which entail constituting dedicated teams of diverse professionals for holistic and expeditious investigations. This strategy is complemented by an intensified approach to addressing low-value corruption, which, despite involving small amounts of money per transaction, has widespread and damaging effects on governance, public trust and service equity. These petty bribes directly impact citizens' daily lives, erode public trust in institutions, increase the cost of living and doing business, undermine public sector efficiency, and perpetuate a culture of corruption.

To mitigate these challenges, the speakers continued, the commission conducts corruption risk assessments and system reviews in high-risk service delivery institutions such as the police, judiciary, health, immigration and land offices to identify loopholes that enable bribery and recommend reforms to seal them. Thereafter, EACC monitors the implementation of these recommendations to enhance accountability. The commission also undertakes integrity testing and sting operations to catch perpetrators of bribery in the act, using the evidence gathered for prosecution or administrative action.

In addition to enforcement, the commission conducts targeted civic education campaigns to inform citizens of their rights and how to report bribery. These efforts are designed to empower the public to actively participate in the fight against corruption and demand integrity in public service delivery.

EACC has prioritised the recovery of corruptly acquired assets due to its high deterrent effect, quick turnaround time and lower standard of proof compared to criminal matters. The strategy aims to ensure that crime does not pay by stripping corrupt individuals of the benefits gained through illicit means. As part of its successes, EACC recovered 56 acres of land in Nairobi that had been corruptly acquired by a private developer, worth approximately 5 billion Kenyan shillings (KSh; US\$39 million). This is a notable example of the commission's commitment to restoring public assets and reinforcing the principle of accountability.

Lessons learned

- Many capital projects suffer from poor planning, weak oversight and inflated budgets that provide fertile ground for corruption.
- Collaboration with implementing agencies is critical in detecting red flags early and enhancing transparency.
- Bribery at service delivery points remains the most visible and prevalent form of corruption affecting citizens daily.
- Citizens are more likely to report bribery when they trust that action will be taken.
- Asset recovery sends a powerful message that crime does not pay and helps to restore public assets.

Challenges

- Politicisation: High-value infrastructure projects are often politically sensitive, making independent oversight challenging.
- Entrenched corruption culture: Bribery is normalised in many public offices, making it widespread in-service delivery points.
- Public apathy: Fear of retaliation, lack of anonymity or scepticism about follow-up discourages citizens from reporting bribery.
- Slow judicial process: Corruption cases often face long court delays.
- Cross-border complexities: Slow processing of mutual legal assistance results into low turnaround times for corruption cases.

Questions and Discussions

There was a question from the Ghana OSP about how the judiciary had helped fight corruption. The answer from the EACC was that the judiciary is supportive. There are law courts that deal with corruption cases. In the High Court, there is a division that deals specifically with corruption. Public officers also declare their assets every year to avoid corruption. If they are not able to explain, they forfeit the assets to the state. When a person declares, they need to be able to explain and account for what they own. Anybody seeking employment public sector is subject to the Leadership and Integrity Act, where details of everyone who wants to join are taken. They fill in the form and write their details, and then the form is stored in the system. If there is any offence against that person, the EACC takes the form in the system as a form of giving out information.

Country presentation by Eswatini

Maphevu Mkhathshwa, Acting Commissioner, Eswatini Anti-Corruption Commission

Mr Maphevu Mkhathshwa of the Anti-Corruption Commission of Eswatini provided an overview of the agency. He said that it derives its legal mandate from the Prevention of Corruption Act, 2006, which empowers it to carry out education, prevention and investigation of corruption-related offences. As part of its mandate, the commission refers appropriate cases to the Director of Public Prosecutions (DPP) for legal action. The commission plays a critical role in raising awareness, enhancing institutional integrity and ensuring accountability through targeted interventions across sectors.

He detailed how one of the commission's notable initiatives involves addressing corruption within the Ministry of Home Affairs, particularly the fraudulent issuance of genuine national documents. These documents include national identity cards, refugee passports, work permits, diplomatic passports, ordinary passports and visas. Through investigations and system audits, the commission had worked to uncover and disrupt networks responsible for the illegal acquisition and distribution of these vital documents, safeguarding national security and restoring public trust in state institutions.



Maphevu Mkhathshwa, Acting Commissioner, Eswatini Anti-Corruption Commission

Challenges

According to the presentation, the main challenges faced in implementing these initiatives include the fact that the documents being issued are genuine, which makes it difficult to detect fraud at first glance. There is also a lack of co-operation from stakeholders, which hampers investigations and delays progress. Additionally, there is often a failure to provide necessary information in a timely manner, further complicating the process. The commission also encounters difficulties in tracing and confiscating the documents, especially once they are in circulation or have been used to obtain other services or benefits.

Results of the innovation

The speaker told the conference that, as a result of the initiative, a total of 49 refugee passports had been identified as having been irregularly issued. This investigation led to the arrest of six (6) officials from the Ministry of Home Affairs (MOHA) who were implicated in the fraudulent activities. Furthermore, seven (7) passports were discovered to have been issued along with entry permits, indicating possible abuse of the immigration system. These outcomes reflect the effectiveness of the initiative in uncovering corruption and holding those involved accountable.

Reflections

The presenter went on to highlight the severe consequences for society of this form of corruption. A wide range of criminal activities is fuelled, enabling identity theft and financial fraud. These documents undermine trust and lead to increased costs to strengthen security measures. Ultimately, this poses a serious threat to national security.

Recommendations

The recommendations from the Eswatini Anti-Corruption Commission were the need to enhance inter-agency co-operation and discourage bribery and corruption.

Questions and Discussions

A question from Kenya stated that the declaration required for all public officials was encouraging and a deterrent, as opposed to South Africa where it usually comes after the commission of crime. The questioner asked how this declaration was applied and which law enforces it. In response, the speaker said the judiciary had been very supportive. Declarations are conducted every two years. Declarations are enforced by law for everyone seeking employment in a public sector, irrespective of position – for verification and vetting purposes.

Laundering the proceeds of corruption, challenges and solutions for investigators and prosecutors

Simon Marsh, Head, Southern and Eastern Africa International Centre for Asset Recovery

Simon Marsh, from the International Centre for Asset Recovery (ICAR) presented on the next topic, focusing on several core activities to combat financial crime and recover stolen assets. The centre's work includes providing specialised training, offering case advice, strengthening legal, policy and institutional frameworks, and engaging in global policy dialogue and innovation.

He said that one common method of money laundering the centre addresses is trade-based money laundering (TBML). This technique is relatively easy to use for moving large sums of money under the guise of legitimate trade. For example, a retail outlet may receive an invoice for assorted goods from a company claiming to be a wholesaler based in the United Arab Emirates (UAE). The retail outlet might never actually receive the goods, or at most, only a minimal delivery occurs. Despite this, the retail outlet makes the payment and uses the invoice as justification for the transfer of funds to the UAE. Uncovering the fact that the goods were never delivered or were significantly misrepresented usually requires a detailed forensic audit. This method effectively launders money by disguising illicit transfers as legitimate commercial transactions.

Another significant challenge in asset recovery, said the speaker, relates to beneficial ownership and the concealment of asset ownership. For instance, when acquiring property in London, the asset might be registered under a company's name rather than an individual. However, the directors and shareholders of this company could themselves be companies registered in different jurisdictions. These companies, in turn, may have their own directors and shareholders registered elsewhere, creating a complex and potentially endless chain of ownership. This structure is designed to create anonymity and obscure the identity of the true beneficial owner. Although regulations often require the declaration of the ultimate beneficial owner, verifying and proving this to an evidential standard is practically very difficult.



Simon Marsh, ICAR

Solutions: how ICAR overcomes the challenges

- **Effective domestic and international intelligence**

Simon Marsh went on to explain the role of effective intelligence. He said the International Anti-Corruption Coordination Centre (IACCC) is a multinational function housed in London, consisting of several permanent representatives and several associate members. Any law enforcement agency can make a referral on a grand corruption matter where there is suspicion of intelligence existing in other jurisdictions. A letter setting out a summary of the investigation, together with details of suspects, associates and entities, including identifiers, should be sent by email as per the agency's own requirements; ICAR can facilitate this. IACCC will review the referral and nominate an officer to take the matter on. Once complete, it will supply a consolidated intelligence package via a secure channel. It can also fast track subsequent mutual legal assistance (MLA) requests.

He went on to note that many countries' law enforcement agencies are willing to co-operate directly with counterparts on a 'police-to-police' basis, though there may be conditions regarding how such requests are sent or received. If there is an international liaison officer, this will be the appropriate person to consult in the first instance. For example, in South Africa, there are liaison officers representing the USA,

Netherlands, Australia, Italy, the UK, Canada and others. Sometimes these officers have a regional role and serve as the point of contact for several countries in the region. ICAR can often advise on how best to capitalise on police-to-police opportunities.

INTERPOL 24/7, meanwhile, is represented by National Central Bureaus (NCBs) in all member countries and serves as the conduit for requesting or disseminating intelligence. There are also some regional centres, such as the one in Nairobi. The Egmont Group is a mechanism for financial intelligence units (FIUs) that meets the requisite criteria, allowing them to request intelligence from other member FIUs and to disseminate intelligence either spontaneously or in response to an enquiry. Neither of these mechanisms has any strict enforceable time limits for response and relies on the willingness and interest of the recipient, as well as the scope of information they have access to.

- **Effective international engagement**

Another solution involves effective international engagement. For example, the Global Forum for Asset Recovery (GFAR) Action Series is a rejuvenated initiative facilitated by ICAR, Star and UNODC. In simple terms, Mr Marsh explained, countries can request to be designated as a focus country. If accepted, they receive financial support to attend a concentrated series of bilateral and multilateral case meetings held alongside global conferences. This system works well because the meetings are arranged and facilitated by the UN, which can significantly expedite matters with international dimensions. It also allows the team to considerably expand their knowledge of the requirements and procedures in partner countries. He pointed out that an agency's country may wish to consider being nominated as a focus country.

Experiences in using the Foreign Corrupt Practices Act (FCPA) in the USA and the UK Bribery Act have shown that these are remarkably effective pieces of legislation, whose extraterritorial application can punch well above their weight. With companies operating across the continent and beyond, there may be scope for agencies to identify opportunities for utilising these tools. They are also useful for joint investigations with other jurisdictions, particularly when a company is listed on a major stock exchange. A policy of deferred prosecution agreements (DPAs) is often used, which imposes a monetary penalty on the company in addition to a period of supervision.

- **Tactics and strategy**

The speaker continued to highlight solutions, observing that effective and thorough intelligence gathering before coercive actions is essential. An investigative strategy should be developed with clear timelines and parameters. Financial investigations must be conducted efficiently to determine where the funds have ended up, both for evidential purposes and to identify assets for recovery. Early international engagement with other jurisdictions is important to establish the best ways to collaborate, including the possibility of joint or parallel investigations. Visualisation techniques, such as the '10-year-old test', can aid in understanding complex financial flows. A strong prosecution strategy must focus on the key evidential issues. The asset recovery strategy should also consider whether it will be conviction-based or non-conviction-based, with effective management of recovered assets to preserve their value. Finally, Mr Marsh said, social reuse of assets should be considered, ensuring that recovered funds benefit the people.

Integrity by design – preparing an anti-corruption legacy for future generations

Thembisio Magajane, Institute of Anti-Corruption and Compliance, South Africa

The Institute of Anti-Corruption and Compliance (IOACC) presented the next topic, with Thembisio Magajane stating that two years before, a career readiness survey had been conducted among Grade 10 learners, capturing not only their career aspirations but also their perceptions around social issues such as corruption. The responses revealed a stark reality: most anti-corruption efforts only begin after the damage has already been done. Furthermore, learners pointed out how outdated systems continue to make it easy for bad actors to thrive. These insights, she said, underscore the urgent need to shift from reactive approaches to proactive, systemic solutions.

She went on to say that this was where the work of the IOACC becomes vital. The institute is at the forefront of the fight against corruption through a range of training programmes and educational initiatives. Its focus is on equipping individuals and institutions with the knowledge and tools to prevent corruption before it starts.



Thembisio Magajane, Institute of Anti-Corruption and Compliance, South Africa

Central to this proactive approach is the concept of 'Integrity by Design', the idea of building systems, curricula and cultures from a young age that make ethical behaviour the default, not the exception. Integrity by Design is about laying a strong foundation of values that prepares future generations to resist corrupt practices and build a more transparent society.

The first pillar of this approach, the speaker continued, is **Education** – Planting Integrity Early. In pilot programme, learners were actively engaged in scenario-based role-playing exercises. They took on roles such as municipal buyers, auditors and whistle-blowers. This allowed them to internalise the ethical dilemmas and decisions that professionals face, making the lessons deeply personal and practical.

The second pillar is **Technology** – Leveraging Digital Tools. Using block coding and beginner-friendly app builders, learners designed simulations of public procurement platforms. These digital tools gave them hands-on experience with systems that can be made transparent and resistant to manipulation, demonstrating how technology can support integrity in governance.

The third pillar is **Governance** – Systems That Work. Learners were tasked with tracking fictional project budgets, identifying missing figures and learning how real transparency functions even within small-scale community projects. This exercise helped them understand the importance of accountability mechanisms and the role they play in preventing corruption at every level of government and society.

She highlighted how reflections from the learners had shown a clear shift in mindset, as many began to view ethical behaviour as a necessary part of everyday decision-making. There had also been requests for replication from other schools, with the success of the programme prompting 113 schools to contact the organisation, wanting this programme. The organisation is also tracking ethical career decisions by alumni to measure the long-term impact and sustainability of the initiative.

Adv. Andy Mothibi, suggested implementing the programme with the preventive framework.

Anti-money laundering (AML) and countering the financing of terrorism (CFT) in the era of artificial intelligence

Shakilla Jhungeer, Founder and CEO, Genesis Consultancy, Dubai, UAE

The Genesis Consultancy presented the next topic of the day, highlighting that artificial intelligence (AI) is increasing efficiency across industries, for both bad actors and investigators. Ms Shakilla Jhungeer observed that there is an AI 'arms race' happening that is shaping the future of anti-money laundering (AML) and the fight against corruption. Today, AI is already being used for numerous applications. It can process over 1 million transactions per minute with 98 per cent accuracy; identify hidden entity relationships through graph analysis; and reduce false positives by 60 per cent. It is also being used by 78 per cent of G20 financial intelligence units (FIUs). These capabilities are transforming the landscape of financial investigations and compliance.

The speaker wanted to point out to the conference that there are several effective AI applications and tools to support investigations. One key area is **Link Analysis and Network Mapping**, with tools such as i2 Analyst's Notebook, Sintelix Link Analysis and Palantir. The purpose of these tools is to uncover relationships and connections between entities such as people, organisations, events and locations. This technique helps identify patterns, dependencies and associations within complex networks. Link analysis visualises connections using nodes (entities) and links (relationships). Features like automatic layouts, node grouping, filtering and timeline analysis allow investigators to detect clusters, anomalies or hidden relationships efficiently.

Another important application is **Procurement Monitoring**, with tools including SAP Ariba, Coupa Procurement and VigLA. The purpose here is to ensure compliance in procurement processes by monitoring transactions for fraudulent activities or irregularities. Advanced analytics and machine learning algorithms assess procurement data for anomalies such as duplicate invoices, unusual vendor relationships or inflated pricing. These tools integrate with financial systems to flag suspicious activities in real-time, helping organisations catch fraud before it escalates.

Visual Connection Mapping, she went on, is also a valuable AI application, using tools such as Palantir Gotham, Tableau and IBM i2. Its purpose is to create intuitive visual representations of data connections for investigative purposes. This method uses

graph theory to map out relationships among entities. Visualisations such as heat maps, cluster diagrams and overlays on geographical maps enable investigators to interpret complex datasets quickly and efficiently, enhancing situational awareness and investigative depth.



Shakilla Jhungeer, Founder and CEO, Genesis Consultancy, Dubai, UAE

For gathering evidence, **Document Scanning for Evidence** is critical, with tools like ABBYY FineReader, Adobe Acrobat Pro and Ravn. The purpose is to extract and analyse information from physical or digital documents for use in investigations. Using Optical Character Recognition (OCR) technology, documents are scanned and converted into searchable text. AI algorithms then analyse the content for keywords, patterns or contextual insights relevant to financial crime investigations, making document analysis faster and more accurate.

Lastly, she said, **Open Data Investigation** is an essential capability using tools such as Maltego, Open Corporates and Aleph. The purpose is to leverage open-source data for identifying financial crime risks and tracing illicit activities. Investigators use open-data platforms to gather information on entities across public records, social media and corporate databases. Data aggregation tools consolidate this information to identify suspicious activities such as shell companies or unregistered assets, enhancing the scope and reach of investigations.

The speaker went on to highlight case studies of AI tools supporting investigations.

Case study: Colombia's VigIA system

Context: The Bogotá Municipality in Colombia and its anti-corruption task force developed an AI-powered tool called VigIA to monitor public procurement contracts. The solution analysed over 12,000 contracts using machine learning models to identify high-risk transactions and flag irregularities such as inflated costs and repeated vendors tied to corruption schemes.

Impact: VigIA flagged \$1.2 billion in risky procurement contracts. It contributed to a 35 per cent reduction in corruption cases related to public spending and significantly improved transparency and accountability in government operations.

Case study: HSBC AI implementation

Context: HSBC, one of the world's largest financial institutions, faced scrutiny for compliance failures in anti-money laundering (AML) practices.

AI solution: HSBC implemented a sophisticated AI-driven transaction monitoring system capable of analysing 1.35 billion transactions monthly across 40 million accounts. The system used machine learning to reduce false positives and identify complex fraud patterns that traditional methods missed.

Impact: The AI system reduced false positives by 60 per cent, saving significant time for investigators. It also enhanced detection speed by up to four times, greatly improving AML compliance efficiency and strengthening HSBC's reputation as a leader in financial crime prevention.

Case study: Rolls-Royce investigation

Context: The UK Serious Fraud Office (SFO) was investigating Rolls-Royce for bribery and corruption allegations spanning multiple countries.

AI solution: The SFO utilised AI-powered Natural Language Processing (NLP) tools to review over 30 million documents related to the case. These tools automatically identified relevant evidence, such as emails and contracts, enabling investigators to focus on critical data without manual review delays.

Impact: The AI tools saved six months of manual document review time and extracted 85 per cent of relevant evidence with high accuracy. This facilitated a successful investigation that resulted in Rolls-Royce paying £497 million in fines as part of a settlement agreement.

Conclusion: a call to action

Ms Jhungeer concluded the presentation stating that the question is not whether artificial intelligence will transform financial crime – it already has. The question is whether investigators will harness these powerful tools to protect their nations' resources and ensure they serve their intended purpose. Technology is merely a tool. Whether it serves corruption or fights against it depends entirely on who wields it and to what purpose. AI-powered detection and investigation techniques are here to help.

She explained to the conference how to start using these tools.

1. Establish a national task force to evaluate current AI readiness in financial intelligence and anti-corruption units.
2. Identify at least one high-value use case where AI could immediately strengthen agencies' existing anti-corruption efforts.
3. Engage with international partners to develop implementation roadmaps tailored to the specific national context.

Country presentation by Togo

High Authority for the Prevention and Fight Against Corruption and Related Offences (HAPLUCIA)

Lardja Arouna, HAPLUCIA, Togo

The presentation by Togo came from the High Authority for the Prevention and Fight Against Corruption and Related Offences (HAPLUCIA), which was established by Law No. 2015-006 of 28 July 2015. The main mandate of HAPLUCIA, according to the speaker, Lardja Arouna, is both promoting and strengthening the prevention and fight

against corruption and related offences across the country's entire administration, including private and public establishments, enterprises and non-governmental organisations (NGOs).

According to Article 2 of the law, the High Authority is committed to the following.

- Ensure implementation in public administration, institutions or any legally constituted persons, of training and compliance actions, periodically.
- Evaluate legal instruments and administrative measures to combat corruption, in particular by means of indicators and statistical analyses.
- Ensure in public and private staff, training policy manuals, codes of ethics and introduce public procurement procedures and commercial contracts.
- Co-operate with the competent judicial authorities.
- Disseminate and publish texts and good practices.
- Promote a system of governance that prevents conflicts of interest, illicit enrichment or any act of corruption, etc.

He went on to state that corruption is one of the fundamental problems for the development of nations. To fight against this plague in Togo, innovative initiatives are useful as a matter of urgency. Young people and the media play a vital role in this fight. So, while it's clear that there can be no development without integrity, the fact remains that the promotion of this value, which guarantees an effective fight against corruption, must necessarily involve raising the awareness of young people and promoting integrity and transparency. To encourage the youth (from primary school to university) to play a leading role in the fight against corruption and related offences, and to involve the media in raising public awareness of the consequences of corruption and the importance of whistleblowing, Togo's anti-corruption agency had initiated several innovative projects from 2024 to 2025.

Implementation of initiatives

Mr Arouna emphasised the three main initiatives developed by the institution:

- A 'Competition for the Best Media Productions on Preventing and Combating Corruption and Related Offences', which was developed in partnership with the Togolese Monitoring Centre for the Media, under the theme 'The Impact of Corruption on Development'.
- A 'Students' Eloquence Competition', which was developed in collaboration with AJ3C (*Association des Jeunes Communicateurs pour le Changement de Comportement*), with the theme 'The Youth Against Corruption and for the Promotion of Integrity'.
- A project to integrate anti-corruption education into teaching and training curricula in Togo, from pre-school to university.

These initiatives, the speaker went on to explain, aim to involve the media in the prevention and fight against corruption and related offences through their productions, and to create a change in behaviour among young people by reviving anti-corruption habits. The results of an associated survey will also enable HAPLUCIA to enhance and tailor its awareness-raising efforts more effectively. The main objectives of these initiatives are as follows.

- To mobilise and involve young people in the fight against corruption.
- To involve the media, through their productions, in the prevention and fight against corruption and related offences.

- To promote the teaching of the values of ethics, integrity, probity, accountability and responsibility at all levels of the education and training system, to prevent and combat corruption in all its forms in the country.



Lardja Arouna, High Authority for the Prevention and Fight Against Corruption and Related Offences (HAPLUCIA) Togo

Implementation of these initiatives in Togo also included, for the Students' Eloquence Competition, the following activities.

- Registration of candidates online.
- Official launch ceremony.
- Organisation of the eliminatory phase.
- Organisation of the semi-finals.
- Organisation of the master classes.
- Organisation of the final round on 27 April 2025 (Independence Day).
- Awards ceremony and appointment of anti-corruption ambassadors.
- Integration of anti-corruption education into education and training curricula.
- Development of terms of reference.
- Meeting to exchange views with ministers in charge of education and technical training.
- Setting up the multisectoral supervision and guidance committee.
- Approval of the terms of reference.
- Setting up the technical commission (made up of national curriculum development experts).
- Setting up the technical sub-commission for pre-school and primary education.
- Setting up the technical sub-commission for secondary education and vocational training.

- Setting up the technical sub-commission for higher education and schools providing initial and continuing training for public sector and private sector employees.
- Beginning tool development.

Challenges

- Insufficient material and financial resources for HAPLUCIA.
- Difficulty in covering all the schools in the country.
- Insufficient awareness of the harmful consequences of corruption among the population.

Project results

- For the Students' Eloquence Competition, 848 candidates were mobilised throughout the country.
- About 60,000 people (pupils, students, parents, etc.) were made aware of the damaging effects of corruption and the promotion of integrity.
- Twenty (20) innovative projects were proposed by candidates that HAPLUCIA would help implement (these projects will affect millions of Togolese). For example, short movies, short stories, poems, cartoons etc.
- Forty-nine (49) media outlets (print, online, TV and radio) were mobilised as a result of the media competition.
- Anti-corruption education was integrated into curricula and programmes at every level of education.

Reflections and lesson learned

- Support from the highest authorities is needed for the integration of anti-corruption education into education and training curricula.
- It is important to motivate of young people, students and journalists.
- The involvement of the youth in anti-corruption actions is crucial.
- Commitment by pupils, students and the media is needed to participate in the various competitions related to the fight against corruption.
- It is important to raise awareness of people on the negative consequences of corruption.

Recommendations

The presenter said that it is recommended that these initiatives, specifically the eloquence and media competitions, should be repeated every year to maintain momentum and continuity in the fight against corruption. There is also a need to mobilise more pupils and students from across the country to participate in these competitions, ensuring wider engagement and inclusivity. Furthermore, pupils and students should be supported in implementing the innovative projects that emerge from these initiatives.

To amplify the impact, he went on, pupils' and students' productions should be broadcast in the media. The messages created and shared by young people should be used as 'soundtracks' during awareness-raising workshops. This approach not only strengthens their voice but also ensures the sustainability of anti-corruption messaging. Additionally, the media should be more involved in raising public awareness and driving behavioural change at all levels of society.

Conclusion

In conclusion, Mr Arouna highlighted that all these initiatives had contributed to the strengthening of integrity, responsibility, accountability and transparency in both the public and private sectors. Most importantly, they had actively involved young people, uniting them in the fight against corruption and related offences in the country. This conference, he said, provides a valuable opportunity for Togo. It also provides the delegation from Togo with a chance to learn from good practices to fight effectively against corruption – both within the nation and globally. Lastly, he said, since 4 May 2024, a new institution had been established, marking a significant step forward in Togo's ongoing efforts to combat corruption and promote good governance.

Questions and Discussions

There was one question from Ms Magajane to Togo, asking how learners were being supported after the competitions had finished. The answer was that if they had projects such as writing, HAPLUCIA helped them achieve those projects, as well as inviting them to all events. When they came, they talked to them to see how they could assist them, as well as coaching them.

County presentation by Cameroon

Innovative initiatives in the fight against corruption in Cameroon

Irene Morikang on behalf of Rev. Dr Dieudonne Massi Gams

A country presentation from Cameroon featured the work of its the National Anti-Corruption Commission (CONAC). The speaker (Irene Morikang, who presented on behalf of Rev. Dr Dieudonne Massi Gams), explained that the country is in the Central Africa sub-region and has a population of approximately 28 million inhabitants. Known as 'Africa in Miniature' due to its rich geographical and cultural diversity, the country is home to over 250 national languages and tribes. Cameroon is also officially bilingual, with both French and English as national languages. However, corruption remains a significant impediment to the country's development and progress.

To address this challenge, she said, CONAC was created in 2006. Its mandate is structured around three core components: investigations, prevention and communication, and studies and co-operation.

Innovative activities: investigations – rapid intervention actions

One of CONAC's key initiatives involves rapid intervention actions. The objectives of these actions are to catch the corrupt in the act, initiate prosecutions, encourage the denunciation of ongoing acts of corruption, and build public confidence and trust in CONAC. These actions are executed by multidisciplinary teams comprising investigators, experts in relevant domains and judicial police officers. Information is gathered prior to each intervention to ensure effectiveness.

Results

In 2024, Irene Morikang said, CONAC conducted 60 rapid intervention actions. These efforts led to 14 proceedings before relevant courts. Five decisions had already been handed down – three for active corruption and two for misappropriation of public funds, forgery and use of forged documents. Nine additional proceedings were, she said, currently underway.

Innovative investigative initiative: anti-corruption clinics

Another impactful initiative involves anti-corruption clinics. These clinics aim to decentralise CONAC's operations by taking services directly to a specific region for a full week. The objectives include processing outstanding denunciations from the region, receiving and addressing new denunciations in real time, initiating prosecutions, and ultimately building public trust.



Irene Morikang and Rev. Dr Dieudonne Massi Gams

The ultimate goals of the clinics are to:

- bring CONAC services closer to the population
- encourage denunciations
- initiate prosecution of corrupt individuals
- reinforce public trust in CONAC.

Results

The speaker explained that five anti-corruption clinics had been organised, including two since the last regional meeting in Ghana. In the South Region, 54 corruption allegations were investigated, leading to 5 arrests and remands into custody. In the North Region, 43 allegations were investigated, with 6 individuals arrested and remanded. Additionally, a total of 1,016,500 CFA francs (CFAfr) in recovered funds was paid back into the public treasury.

Innovative activities: prevention and communication – billboards against fake certificates

To combat corruption related to fake academic certificates, CONAC launched an initiative involving the placement of billboards on university campuses. The objective is to expose acts of corruption tied to obtaining fake certificates and caution students and the public about the dangers – to individuals, families and the nation. The campaign also aims to popularise CONAC's denunciation channels.

The method for this activity was to:

- first, identify all legally recognised higher institutions
- then, fabricate and install billboards
- next, organise a national launching ceremony
- finally, deploy CONAC staff to implant billboards across campuses.

Results

The presenter said a total of 150 permanent billboards had been installed on 76 campuses, including 11 state universities and 65 private institutions. The presence of CONAC contact information on these billboards made it easier for students and lecturers to report misconduct. As a result, more denunciations of fake certificate holders had been received.

Innovative activities: prevention and communication – special audio-visual programmes

To further strengthen its communication strategy, CONAC has developed special audio-visual programmes. The main objectives are to broadcast successful anti-corruption operations – especially rapid interventions and clinics – build public trust in CONAC, encourage more reports of corruption, and fight impunity by creating fear among potential offenders.

The method for this activity was to:

- first, establish partnership agreements with media houses
- then, utilise CONAC's fully equipped studio and professional media personnel
- next, produce ready-to-broadcast programmes and share with media outlets
- finally, focus on the consequences of corruption, while protecting the identity of accused individuals.

Results

The presenter said over 20 special programmes had been produced, covering different sectors such as toll gates, weighing stations, schools, hospitals, highway checkpoints, public procurement and local councils. This media exposure has contributed to a noticeable drop in systemic corruption, particularly in schools, hospitals and similar public service areas.

Innovative activities: prevention and communication – anti-corruption sensitisation in local languages

One of CONAC's key prevention strategies is anti-corruption sensitisation in local languages. The objective is to reach rural populations in their native dialects, which are often neglected in mainstream communication. Cameroon, being a cultural melting pot with over 300 local languages and ethnic groups, necessitates such an inclusive approach.

This initiative, the speaker explained, aims to encourage resistance to corruption, promote the denunciation of corrupt practices, fight impunity and instil fear among potential perpetrators – making it an effective prevention tool.

The method for this activity was to:

- first, partner with 22 community radio stations
- then prepare ready-to-broadcast programmes delivered to community radios in English and French

- finally, have local broadcasters translate and air the content in over 100 local languages, with plans to reach 200 languages by the end of the year.

Results

The speaker said the initiative had led to an increase in denunciations from rural areas, where acts of corruption were previously normalised or left unchallenged.

Innovative initiatives: co-operation – training of heads of anti-corruption units

To enhance institutional integrity, CONAC has prioritised capacity building for the heads of anti-corruption units across public and para-public structures. The objective is to improve their ability to act efficiently and in co-ordination with CONAC.

The ultimate goals of the training are the following.

- Ensure the active functioning of anti-corruption units.
- maintain real-time communication with unit heads
- enable rapid handling of denunciations, especially those related to systemic corruption within ministries and public institutions.

Results

In 2024, 500 heads and members of anti-corruption units were trained on key topics, including:

- drafting codes of ethics, procedural manuals and corruption risk maps
- identifying corruption and related offences
- whistle-blower protection
- leadership for change
- anti-corruption communication strategies
- managing resistance to change and measuring progress.

Over 200 denunciations were received through CONAC's Hotline and WhatsApp and were forwarded to the appropriate units for follow-up. Many issues were resolved, and feedback was communicated back to CONAC.

Innovative initiatives: co-operation – partnerships to boost the fight against corruption

To amplify its impact, the speaker continued, CONAC had also entered strategic partnerships aimed at strengthening anti-corruption efforts and promoting public ownership of the cause. The objectives here were to:

- reinforce the national anti-corruption drive
- encourage key stakeholders to take ownership of the fight.

The ultimate goals of these the partnerships are to:

- popularise the anti-corruption movement
- grow a community of positive actors committed to fighting corruption
- encourage public denunciation
- promote values of integrity.

Results

Since March 2024, CONAC has formalised partnerships with:

- the Ministry of Women's Empowerment and the Family, to engage women as agents of change
- 22 community radio stations, to promote local language mobilisation
- three artists, who use music to spread anti-corruption messages
- the national broadcaster, CRTV, which airs CONAC programmes across its 3 TV channels, 11 radio stations, and 6 FM stations.

Innovative activities: co-operation – benchmarking visit to Sierra Leone (16–19 September 2025)

As part of its international co-operation strategy, CONAC undertook a benchmarking visit to Sierra Leone to learn from its anti-corruption experience. The objective was to study the implementation and impact of 'Non-Conviction-Based Asset Recovery' as a tool for combatting corruption.

It was observed that this mechanism is practical and effective. It is grounded in legal provisions that empower Sierra Leone's Anti-Corruption Commission to engage in negotiations for asset recovery and payments without requiring criminal convictions.

Outcome

A recommendation was made to incorporate provisions on Non-Conviction-Based Asset Recovery into Cameroon's new anti-corruption law, currently in development.

General outcomes

According to the presentation, the general outcome of CONAC's activities in 2024 has been a notable increase in public trust and stronger resistance to acts of corruption. A total of 2,620 denunciations were received through various channels: 1,923 via PO Box 33200 Yaoundé, 314 through the email address info@conac.cm, 157 via the Hotline 1517, and 226 through WhatsApp at +237 652 26 26 82. Of these, 1,538 cases were processed directly by CONAC, while the remaining were forwarded to competent authorities for appropriate action. Anti-corruption units in public and para-public administrations have become more vibrant, now regularly submitting summaries of their activities to CONAC for inclusion in Cameroon's *Annual Anti-Corruption Status Report*. The fight against open, systemic corruption has also been reinforced, and the fear associated with reporting corruption is gradually shifting sides to affect the corrupt themselves. This shift has been largely driven by the public broadcast of conclusive investigations, which has created a sense of CONAC's omnipresence. Additionally, the benchmarking visit to Sierra Leone generated new ideas for enhancing anti-corruption strategies, including the recommendation to establish a compliant review committee at CONAC and the future engagement of undercover agents in sensitive government structures.

Challenges

- There were noted to be inadequate resources (financial, material, human, technological).
- Also challenging is the absence of an anti-corruption law for an appropriate judicial framework.
- Declarations of assets and property do not take place.
- There is also the absence of decentralised offices for provision of CONAC services

Lessons learned

From the new initiatives, the speaker made the following recommendations:

- It is important to educate the public on their rights in any way possible, as they are a great force for change when they resist and denounce corruption.
- Exposing acts of corruption and pushing fear into the camp of the corrupt is crucial, as this is an effective prevention strategy – since the instinct to engage in corruption is driven by fear and greed.
- Agencies should build partnerships whenever possible to make fighting corruption a shared responsibility.
- They should train anti-corruption relay agents, because combatting corruption should be an intentional and conscious action.
- It is important to be humble and learn from others – there's no need to start from scratch when effective models can be copied and adapted.
- Finally, good laws are indispensable in the fight against corruption.

And in conclusion, Mrs Irene said, innovative anti-corruption activities carried out over the last 12 months had rekindled hope in the fight against corruption in Cameroon. However, the battle is yet to gain the desired momentum, as all public services continue to stagger under the weight of corruption, with the country losing billions of CFA francs each year. The adoption of an anti-corruption law, the decentralisation of CONAC, and the enforcement of asset and property declarations would represent further giant strides in the right direction.

Country Presentation by Malawi

Innovative projects in the fight against corruption in Malawi: integration of technology in procurement

Hillary Chilomba

The country presentation by Malawi detailed the work of its Anti-Corruption Bureau (ACB). Hillary Chilomba from the ACB commenced by stating the bureau was established in 1998 under an Act of Parliament, the Corrupt Practices Act of 1995. He said the Anti-Corruption Bureau (ACB) serves as the lead institution in the fight against corruption in Malawi. Its mission is to spearhead the fight against corruption through prevention, education and law enforcement. Its vision is to become 'an institution that promotes integrity and good governance towards attaining a corruption-free Malawi'.

The ACB is guided by core values that include inclusiveness, ensuring open participation in programming, partnerships and networking; quality service delivery providing services efficiently, effectively and independently; personal and professional conduct, upholding the highest degree of integrity, honesty, competence, commitment and confidentiality; good stewardship, ensuring prudent resource use and sound management; and innovation and resourcefulness, striving for creativity and continuous improvement in response to changing needs and circumstances.

The speaker continued, explaining that the **functions of the ACB** include taking necessary measures to prevent corruption in the public and private sectors, receiving and investigating complaints or reports on suspected corruption, and prosecuting offences under the Corrupt Practices Act (CPA). Structurally, the ACB operates through four departments: Corruption Prevention, Public Education, Investigation and Legal and Prosecution. The bureau reports to the Legal Affairs Committee of Parliament.

Integration of technology in procurement

To strengthen transparency and efficiency in public procurement, the presenter noted that the Malawi Government had implemented e-procurement systems. These systems aim to improve the monitoring and reviewing of contracts and expenditures, thereby reducing opportunities for corrupt practices.

The objectives of the integration of technology in procurement include:

- **Transparency:** Providing a clear and open framework for procurement processes, making information accessible to all stakeholders, including the public, vendors and regulatory bodies.
- **Efficiency:** Digitising procurement to streamline procedures, reduce paperwork and minimise delays.
- **Accountability:** Enhancing the tracking and auditing of procurement activities to hold government officials accountable.



Hillary Chilomba

Key features of the e-procurement system include:

- **Centralised platform:** There is an online hub where government departments post procurement opportunities and vendors submit bids electronically.
- **Automated workflows:** Automation of processes takes place, such as bid submissions, evaluations and approvals, to reduce errors and improve efficiency.
- **Real-time monitoring:** This enables stakeholders to access live data on procurement activities for effective oversight and irregularity detection.
- **Vendor management:** This involves features that support vendor registration and updates, facilitating broader and fairer participation in bidding.

Benefits of this Innovation

According to the presentation, the introduction of the e-procurement system in Malawi has resulted in improved competitiveness among suppliers by opening the bidding process to more participants. It has also significantly increased transparency and reduced corruption, marking a critical step forward in public sector integrity and accountability.

Challenges

A first challenge is resistance to change. This means some stakeholders may be reluctant to adopt the new system due to a lack of understanding or fear of losing traditional methods of doing business.

A second challenge is infrastructure issues. For example, internet connectivity and technological infrastructure might pose challenges, especially in rural areas, affecting the accessibility of the system.

Reflections

Hilary Chilomba highlighted how the Malawi Government continues to refine the e-procurement system and expand its functionalities. Future enhancements, he said, may include integrating additional data analytics tools to better assess procurement performance and outcomes. The ongoing commitment to improving public procurement through e-procurement is expected to contribute to a reduction in corruption and an increase in public trust in governmental operations.

The speaker concluded by summarising some of Malawi's other innovations.

1. **Public expenditure tracking surveys (PETS)**

This initiative enables citizens to monitor public funds and service delivery in sectors like education and health. By comparing budget allocations with actual spending observed at the local level, communities can identify discrepancies and hold public officials accountable.

2. **Citizen engagement platforms**

Platforms developed by organisations such as the Malawi Human Rights Resource Centre allow citizens to report corruption, give feedback on government services and raise concerns about governance. These tools aim to empower citizens and encourage active participation in anti-corruption efforts.

3. **Digital reporting mechanisms**

The expansion of mobile phones and digital tools has made it easier for citizens to report corruption anonymously via hotlines and mobile apps. These mechanisms reduce fear of retaliation, simplify the reporting process and encourage more people to come forward.

4. **Training and awareness campaigns**

NGOs and civil society groups have organised campaigns to educate citizens on their rights and the impact of corruption. Through workshops and seminars, they equip people with the knowledge to recognise corruption and report it effectively.

5. **Anti-corruption commissions**

The independent Anti-Corruption Bureau (ACB) in Malawi plays a central role in fighting corruption. It uses a mix of investigations, public education and international collaboration to reduce corrupt practices across the country.

Country presentation by Nigeria (ICPC)

Innovative project undertaken by ICPC in the fight against payroll fraud

Dr Musa Adamu

Dr Musa Adamu presented on behalf of Nigeria's Independent Corrupt Practices and Other Related Offences Commission (ICPC), the country's foremost anti-corruption agency. He said that the agency remains forefront of combatting corruption in the public sector.

He went on to highlight a specific innovative operation of the commission. He said that, as part of its investigative initiatives, the commission received credible intelligence from a whistle-blower regarding the existence of 'ghost workers' on the national payroll managed by the Integrated Personnel and Payroll Information System (IPPIIS). This prompted an extensive investigation aimed at uncovering fraudulent payroll practices.

The IPPIS is a centralised payroll platform instituted by the Federal Government of Nigeria to manage the payment of salaries and wages to public sector employees. The primary goals of IPPIS include the elimination of ghost workers, maintaining accurate personnel records, ensuring efficient payroll management, and fostering transparency and accountability. It was introduced to replace the manual payroll system that was prone to fraud, errors and various irregularities.

In conducting the investigation, the ICPC adopted a range of methodologies to uncover the payroll fraud. Key among these was the use of data analytic tools to match payroll data generated through IPPIS with the nominal rolls of ministries, departments, and agencies. This approach enabled the detection of discrepancies between the official employee records and actual payroll entries. Further support was provided by a fintech firm, which partnered with the commission to validate the account details of suspected ghost workers. These tools allowed for the cross-checking of bank account names against the payroll records to authenticate or discredit the entries, thereby exposing fictitious names and revealing the diversion of public funds.

The investigation relied heavily on the pivotal roles played by non-state actors. The collaboration with these actors was the turning point for the successful and timely completion of the initiative. The fintech company provided a robust and scalable solution, validating tens of thousands of bank accounts of payroll beneficiaries simultaneously, a task that would have been both time-consuming and laborious if done manually by the investigative team. In addition, whistle-blowers were instrumental to the operation's success. Their accurate intelligence provided valuable direction to the team, reinforcing the credibility and effectiveness of its input in anti-corruption efforts.



Dr Musa Adamu, ICPC

As a result of this comprehensive investigation, significant milestones were achieved. The ICPC successfully recovered ₦21.199 billion (approximately US\$13.4 million) from Pension fund administrators. Furthermore, the commission identified over 22,000 ghost workers on the IPPIS platform. The removal of these fictitious workers led to a monthly savings of about ₦400 million (US\$190,000) for the government. Additionally, the investigation stopped the personal income tax (PAYE) deductions that had been withheld without remittance, amounting to ₦10.4 billion (US\$6.3 million). Another ₦10.9 billion (US\$6.6 million) in unapplied pension deductions from ghost workers was also stopped. The speaker observed that this initiative underscored the importance of data analytics, inter-agency collaboration, and the critical roles of non-state actors and whistle-blowers in unmasking systemic corruption within Nigeria's public sector.

Criminal prosecution of perpetrators

Case of Oseni Olawale Sunday	The police payroll is not exempt
<ul style="list-style-type: none"> • Oseni Olawale Sunday was Deputy Director at OAGF. • He controlled 22 fraudulent payroll profiles. • Thirteen (13) profiles were allocated to family members. • The remaining nine profiles he used personally. • Oseni Olawale Sunday died by suicide in February 2025, a day before the commencement of his trial. 	<ul style="list-style-type: none"> • Over 1,000 fraudulent payroll profiles have been discovered on the police payroll. • Twenty (20) corporate entities duly registered with the Registrar of Companies were found on the payroll. • One of the companies is a four-star hotel belonging to a senior police officer. • Forfeiture proceedings on the hotel had commenced at the time of this presentation.

Challenges

- Incomplete or inaccurate record-keeping is a significant problem.
- There are also vulnerabilities in payroll systems.
- It is difficult to collect and verify data.
- The public servants responsible for the payroll fraud deliberately hamper and frustrate investigations.

Reflections and lessons learnt

- The importance of collaboration between state and non-state actors cannot be over emphasised.
- Governments at all levels need to embrace technology.
- Agencies should continuously review the Federal payroll.
- It is important to deploy high-end software with a good system audit trail to facilitate timely detection of alterations on the payroll.

Recommendations

Dr Adamu outlined some recommendations that arose from the ICPC operation. First, there is a critical need for **periodic identity validation** across all government employees. This will ensure that only legitimate staff remain on the payroll system through regular biometric and identity verification processes.

Secondly, establishing a **consolidated payroll database** is essential. This single, independent database would serve as the authoritative source for payroll information, thereby ensuring data integrity and minimising the risks associated with third-party handling of payroll data.

Another vital recommendation is the **linkage of IPPIS with the Bank Verification Number (BVN) and the National Identification Number (NIN)**. This integration would streamline payroll operations and prevent multiple or fraudulent identities from being used to siphon public funds.

The government should also adopt a **standardised recruitment and onboarding process**. Implementing uniform procedures will significantly reduce the chances of ghost workers being introduced into the system and will enhance the accountability of the recruitment process.

There is also a need for **continuous monitoring and auditing** of the payroll system. Regular internal audits and system reviews will help identify and address systemic issues before they escalate, ensuring prompt corrective measures are taken.

Finally, fostering **regional collaboration** among government agencies, state entities and international partners can bolster the effectiveness of anti-corruption measures and enhance the capacity to combat payroll fraud collectively.

Conclusions

He concluded by stating that the investigation had emphasised the vital role of **leveraging technology** to enhance transparency and accountability in public payroll systems. The implementation of advanced monitoring systems and digital tools has significantly improved oversight and exposed previously undetected fraudulent activities.

Equally important is the **collaboration with non-state actors**, particularly whistle-blowers and fintech firms. Their contributions were pivotal to the success of the initiative, offering credible intelligence and technological solutions that accelerated the detection of fraud.

Ultimately, he said, these efforts contribute not only to fiscal discipline but also to **national security and sustainable development**. By eliminating waste and fraud from the system, resources can be better allocated to critical sectors, reinforcing good governance and building public trust.

Strengthening integrity and accountability in the public service: the role of public service commissions in combatting corruption in Africa

Yasmin E Bacus, Commissioner, KwaZulu Natal Province Public Service Commission

The Commissioner of KwaZulu Natal Province Public Service Commission (PSC), Yasmin Bacus, presented the next topic. She said that over the past decade, South Africa had witnessed widespread state capture, a phenomenon that drained billions from the public purse and severely weakened institutions intended to serve its citizens. The Judicial Commission of Inquiry into Allegations of State Capture, 'the Zondo Commission', revealed extensive collusion between private interests, political elites and public servants. These revelations laid bare how billions of rands (R) were siphoned from key state institutions such as Eskom, Transnet and South African Airways, eroding public trust in the process.

She noted that South Africa's Corruption Perceptions Index (CPI) scores from Transparency International reflect this deep-seated crisis. The country's score declined from 44/100 in 2019 to 41/100 in both 2023 and 2024, signalling an urgent need for comprehensive and systemic reform. These events reaffirmed the fact that robust institutional oversight is not optional but essential for democratic governance and sustainable development.

In response, she said, several institutional and legislative reforms had been initiated. The National Prosecuting Authority (NPA) was strengthened to pursue corruption cases, including the formal establishment of the Investigative Directorate (ID). High-profile arrests followed, involving figures linked to Bosasa, Transnet and Eskom. However, the slow pace of prosecutions and convictions continues to undermine public confidence in the NPA's effectiveness.

Meanwhile, the Special Investigating Unit (SIU) had played a pivotal role in post-state capture recovery efforts, recovering more than R128 billion and freezing assets linked to corrupt activities. There had also been a revision of the Procurement Act to enhance transparency and accountability. However, the debate is ongoing over whether the National Treasury should continue to house the Special Unit tasked with procurement oversight.



Yasmin E Bacus, Commissioner, KwaZulu Natal Province Public Service Commission

The speaker continued to explain the situation in South Africa, saying the President had announced plans to establish a permanent anti-corruption entity within the NPA, which would possess both investigative and prosecutorial powers. This body may eventually replace the existing Investigative Directorate. Additionally, in the last two State of the Nation Addresses (SONA), the President had committed to strengthening oversight agencies and state-owned enterprises (SOEs), including enhancing the role and capacity of the Public Service Commission (PSC).

Public service appointments had come under intense scrutiny, particularly around the practice of cadre deployment. While this scrutiny spurred parliamentary debate, there were yet to be any concrete changes in policy. In this context, the PSC was called upon to play a leading role in promoting merit-based recruitment and improving protections for whistle-blowers, who are crucial to uncovering corruption within the public sector.

The Auditor-General of South Africa also introduced real-time auditing in select instances, enabling earlier detection and prevention of corruption. This approach marks a shift from retrospective to proactive oversight, enhancing the ability to respond swiftly to irregularities.

Civil society organisations and the media continue to play an essential watchdog role. Their persistent efforts had helped maintain public pressure on the government to act on the Zondo Commission's recommendations. The President had tabled a formal response to the commission's findings, and periodic progress reports had been released, signalling a commitment to accountability, although much work remains to be done.

These developments, the speaker said, highlight the evolving but incomplete institutional response to corruption in South Africa. The role of the PSC, particularly in reforming recruitment processes and protecting whistle-blowers, remains central to rebuilding integrity in the public service.

Ms Bacus listed how public service commissions are valuable:

- PSCs are integral institutions established across Africa.
- They drive the imperatives of the Constitution of their countries and provide independent oversight over the civil service.
- PSCs analyse and guide recruitment practices and policies.
- They ensure merit-based appointments and uphold ethical standards in public administration.
- While nearly every African country has its own PSC, their establishment dates and specific mandates vary.

She also highlighted some common foundational mandates of PSCs in Africa:

- They promote the values and principles of the respective Constitutions of the country.
- Merit-based recruitment cuts out nepotism, favouritism and political deployment – all of which compromise governance.
- PSCs promote professional ethics and accountability.
- They carry out performance monitoring of civil servants and monitor departmental service delivery.
- They investigate grievances and maladministration by public servants.
- They emphasise, monitor and drive compliance with their respective codes of conduct of the public service.
- PSCs promote ethical leadership practices among executives, especially in instances of political change of administrations and cabinet reshuffles.
- They also advise the executive on public administration.

The South Africa PSC's constitutional mandate

The speaker went on to explain that the Public Service Commission (PSC) of South Africa is established under Chapter 10, Section 196 of the Constitution. It is mandated to promote the values and principles outlined in Section 195, ensuring effective and efficient public administration. The PSC operates independently and impartially, exercising its powers without fear, favour or prejudice. It is directly

accountable to Parliament and provincial legislatures, providing direction and advice to national and provincial organs of state on personnel practices and performing oversight functions. Its core responsibilities include promoting professional ethics, monitoring and evaluating service delivery, and investigating grievances and maladministration by public servants. The commission consists of 14 members appointed by the President: five national commissioners and nine resident commissioners representing each province. All commissioners hold equal powers and responsibilities.

National and international frameworks

South African Anti-Corruption Frameworks

NATIONAL FRAMEWORKS	INTERNATIONAL AND REGIONAL FRAMEWORKS
<ul style="list-style-type: none"> • The Constitution of the Republic of South Africa (1996), includes provision on accountability, transparency, and public administration • Prevention and Combating of Corrupt Activities Act (PACCA), 2004 main anti-corruption law criminalizing corrupt • Protected Disclosures Act, 2000 (as amended) Protects whistleblowers • Public Finance Management Act (PFMA), 1999 & Municipal Finance Management Act (MFMA), 2003 • Public Service Act, 1994 and Regulations Set ethical standards for public servants • National Anti-Corruption Strategy (NACS), 2020–2030: 10-year plan to create a corruption-free society 	<ul style="list-style-type: none"> • United Nations Convention Against Corruption (UNCAC), ratified in 2000, provides a comprehensive global framework for combating corruption • African Union Convention on Preventing and Combating Corruption (AUCPCC), ratified in 2003, promotes anti-corruption measures and regional cooperation • SADC Protocol Against Corruption, ratified in 2003, focuses on preventive measures, enforcement- and regional collaboration • OECD Anti-Bribery Convention (Observer status); aligns with OECD principles on combating bribery in international business

PSC's role in the anti-corruption ecosystem

The Public Service Commission (PSC), she said, plays a critical role in strengthening ethical governance and professional conduct within the South African public service. It is actively involved in the orientation and training of all new Members of the Executive Council (MECs), Members of Parliament (MPs) and members of provincial legislatures. The PSC participates in these orientation programmes and has developed handbooks and guidelines tailored for executives and senior managers.

The commission investigates cases of maladministration and unethical conduct through its Labour Relations and People Management Unit. It also monitors compliance with ethical standards and service delivery obligations via its Integrity and Anti-Corruption Unit. In promoting professional ethics and the Code of Conduct, the PSC champions the '*Batho Pele*' ('People First') values and principles. Its Professional Ethics Unit conducts training for public servants, the South African Police Service (SAPS) and even management teams at technical colleges, often in collaboration with the National School of Government (NSG).

Additionally, the PSC administers the financial disclosure process for public servants through its E-Disclosure system. This system is linked to the Registrar of Deeds Office for property asset verification, the e-Natis system for vehicle asset verification, and the Companies and Intellectual Property Commission (CIPC) to validate company directorships and registered entities. The PSC also monitors compliance

with the Remunerative Work Outside the Public Service (RWOPS) policy. To ensure accountability and improved service delivery, PSC conducts both announced and unannounced inspections at the national and provincial levels annually. These inspections are informed by service delivery challenges identified through internal analysis and complaints received from the public.

The commission continues to play a pivotal role in strengthening ethics, accountability and anti-corruption efforts within the public service. It regularly reviews anti-corruption strategies and monitors compliance with the Code of Conduct, while also driving culture change through departmental engagement, structured reporting and targeted training programmes.

The PSC also administers the National Anti-Corruption Hotline (NACH), which at the time of the presentation was under review to expand service hours, enhance digital capabilities and align with the certification standards of the Ethics Institute of South Africa. In line with Section 196 (5) and (6) of the Constitution, the commission submits regular reports to the National Assembly and provincial legislatures to ensure transparency and parliamentary oversight.

Whistle-blower protection is a key priority for the PSC. It made a formal submission to the Department of Justice advocating for reforms in whistle-blower legislation and works closely with Whistleblower House, an NGO dedicated to supporting whistle-blowers. The PSC also ensures that every government department implements a whistle-blower policy to safeguard those who report misconduct.

Oversight on suspensions of public servants is another critical function, with the PSC reporting these matters to the appropriate authorities. In cases where project outcomes raise concern, the commission submits reports to the Auditor-General for further investigation.

Furthermore, the PSC is actively involved in both national and provincial Forums for Institutions Supporting Democracy (FISDs), fostering collaboration across democratic oversight bodies. It also advocates for policy reform through direct engagement with the executive and Parliament, reinforcing its commitment to good governance and integrity in the public sector.

Professionalisation of the public service

The speaker moved on to talk more generally on professionalisation of the public service. A professional public service, she said, staffed by skilled, committed and ethical professionals, is critical to building an effective state and ending corruption, patronage and waste. To achieve this, the public service professionalisation is being prioritised as a cornerstone of public sector reform.

As part of this effort, integrity assessments will become a mandatory requirement for recruitment into the public service, helping to ensure that only individuals with strong ethical foundations enter government roles. Additionally, entry examinations will be introduced to promote merit-based recruitment and ensure that candidates possess the requisite competencies for their roles.

This approach, she explained, would also guarantee that qualified individuals are appointed to senior management positions, fostering credibility, performance and accountability at leadership levels. Furthermore, the professionalisation strategy includes a shift towards creating a single, harmonised public service, extending public service policies to the local government sphere and ensuring uniform standards across all tiers of government.

The five pillars of the professionalisation framework



Yasmin Bacus listed some of the PSC's flagship projects:

- SAPS forensic laboratories: This is an investigation into delays in alleged corruption investigations by forensic officers in collusion with SAPS officers that denies victims of crime, justice.
- SITA investigation: This was commissioned by the Minister of Communications and Digital Technology to investigate inefficiencies of the State Information Technology Association (SITA) and their impact on services to the citizens.
- Flagships: PSC is currently undertaking an assessment of cyber security in the public service and the challenges of government accommodation, where it is alleged that civil servants are colluding with private commercial property owners.
- Family Summit: this took place 15 May in the Free State Province to shine a light on improving the moral code in society.
- Citizens' forum engagements. The PSC meets with the public to hear concerns and gather information.
- Media sessions: The PSC regularly releases findings and recommendations to the media.
- Ethics forums: Here, departments appoint ethics officers to constitute national and provincial ethics forums. The same is done with forensic investigation forums.
- Annual international anti-corruption dialogues: These are preceded by provincial dialogues, with the PSC working with the Office of the Premiers and Municipalities and Metros.
- Thought leadership webinars: These take place with academics and experts in various fields.

Objectives of the PSC Bill

The presenter went on to provide an overview of the **Public Service Commission Bill 2022**, which seeks to modernise and strengthen the institutional framework of the PSC to enhance its role in promoting good governance within the public sector. One of its primary objectives is to **repeal the Public Service Commission Act of 1997**, replacing it with a more robust and current legal foundation.

The Bill aims to **grant the PSC full financial and administrative independence**, allowing it to operate autonomously with its own secretariat. This is a critical step in ensuring that the commission functions without undue influence, enabling it to carry out its mandate more effectively.

Another key objective is to **clarify and strengthen the PSC's role** in public service oversight. By doing so, the Bill seeks to **improve the efficiency and impact of the PSC** in driving accountability and professional ethics within public administration – an essential pillar in building a **capable, ethical and developmental state**.

Importantly, the Bill also provides for the **extension and implementation of the PSC's mandate to municipalities and public entities**, ensuring a more integrated and comprehensive oversight mechanism across all levels of government.

Stakeholder engagements and partnerships

The speaker detailed how the PSC actively engages with a broad spectrum of stakeholders to share information, present oversight reports and collaborate on improving performance within the public service. Its key partners include the Presidency, the National Assembly and relevant portfolio committees, national ministers and government departments, provincial legislatures and their portfolio committees such as SCOPA, provincial MECs, and provincial government departments.

In addition, the PSC works closely with institutions supporting democracy, including South Africa's Public Protector, the Special Investigating Unit (SIU), the South African Human Rights Commission (SAHRC), the Auditor-General, the Independent Electoral Commission (IEC), among others. The commission regularly makes presentations to the National Assembly, provincial legislatures and various portfolio committees to ensure ongoing accountability and transparency. It has formalised collaborations through MOUs with the National School of Government, several academic institutions and civic organisations, focusing on knowledge and skills transfer. It also partners with State Education and Training Authorities (SETAs) to enhance capacity-building initiatives. Furthermore, the PSC has been elected to chair the African Platform of Public Service Commissions, reflecting its leadership role and commitment to advancing public service standards across the continent.

Challenges

- **Causes economic damage**

Yasmin Bacus talked about challenges, noting that corruption poses a serious threat to development and economic growth. It creates an unpredictable business environment that discourages both foreign and local investment. Additionally, corruption increases the cost of doing business by fostering a culture of bribes and informal payments, which hinders economic efficiency and competitiveness.

- **Undermines public service and erodes trust in government**

She noted that corruption also diverts critical funds away from essential public services such as education, healthcare and infrastructure, disproportionately affecting the most vulnerable and indigent populations. This misallocation results in poor-quality services, including under-resourced hospitals, unsafe buildings, failing schools and a general deterioration in the standard of education.

Furthermore, corruption erodes public trust in government institutions, fostering citizen apathy or unrest among those who feel disempowered and unrepresented. Ultimately, corruption obstructs good governance, weakening the foundations of democratic accountability and service delivery.

- **Deepens inequality and poverty**

Corruption also misuses or steals resources meant for development, worsening poverty and inequality. It disproportionately benefits the wealthy or politically connected, while marginalising the poor and vulnerable. The manipulation of tenders and contracts undermines small, medium and micro enterprises and the local economy, leading to increased unemployment. Political interference often suppresses efforts to combat corruption, while weak enforcement mechanisms and fragmented institutional responses tend to favour services for the rich, further entrenching inequality.

- **Weakens the rule of law and justice**

Corruption compromises the integrity of law enforcement and judicial systems by protecting the corrupt and punishing whistle-blowers. This fosters an environment where organised crime, human trafficking and political violence can flourish. Ultimately, corruption destabilises governments and can lead to conflict, undermining justice and the rule of law.

Strategic interventions to combat and prevent corruption

Strengthening governance and oversight

The speaker observed that effective governance and oversight require independent and competent departments staffed with skilled experts from relevant sectors to ensure thorough and informed supervision. Hence the selection of personnel must be based on merit and experience, supported by clear, current, and contextual policies and procedures.

She highlighted how strong audit committees play a vital role in overseeing financial management and reporting, ensuring transparency and accountability. Financial reports should be accessible to the public to allow for external scrutiny. An open and transparent procurement system is essential to prevent corruption and promote fairness.

Whistle-blower protection systems must also be established to safeguard those who report misconduct. Consequence management is crucial, requiring swift investigations followed by appropriate disciplinary action and prosecution. Recovering all proceeds of corruption through asset forfeiture reinforces deterrence and accountability.

Building a culture of integrity

According to the presenter, institutionalising ethics at all levels of government is foundational. Therefore, regular anti-corruption and ethics management awareness and training workshops should be hosted to drive culture change, instilling a zero-tolerance attitude toward corruption. Strong legal consequences must be enforced to uphold integrity, with sustainability as a key priority.

Stakeholder inclusivity, collaboration and partnerships

Sustainable progress also depends on inclusivity and collaboration. Benchmarking against good practices and fostering multidisciplinary agency partnerships strengthen collective efforts. Civil society participation through forums, meanwhile, ensures that initiatives work beyond private interests to achieve broader societal change.

Based on the foregoing, Ms Bacus made the following recommendations:

- It is vital to protect the independence of public service commissions fiercely.
- Members/commissioners and staff must undergo ethics and integrity training and lead by example. They must be open to lifestyle audits and not be political office bearers. They must be the guardians of democracy.
- Agencies should strengthen oversight and enforcement tools, including digitalisation of systems and reporting to be able to track where matters have been compromised
- They should insist on consequence management, enhance collaboration and partnerships, and revise/review legislative frameworks.
- It is also important to promote public education and transparency, as well as holding media briefings to release results of inspections and analyses.

In conclusion, she said that preventing and combatting corruption in the public service would only bear fruit through strong partnerships among all stakeholders, each diligently carrying out their mandates. PSCs play a pivotal role in restoring public trust and guiding leadership towards integrity. It is essential that ethics become embedded in how everyone conducts business, moving beyond mere oversight or compliance requirements to becoming a fundamental part of the public service culture.

Questions and Discussions

There was one question from Botswana asking how the PSC works with other law enforcement agencies like the SIU. The speaker responded, saying matters were handed over to the SIU, the Public Protector, as well as National Prosecuting Authority.

Day 4: Thursday 8 May 2025

The role of democratic institutions in anti-corruption oversight

Adv. Kholeka Gcaleka, Public Protector, South Africa



Adv. Kholeka Gcaleka, Public Protector, South Africa

Advocate Kholeka Gcaleka, South Africa's Public Protector, presented on the evolving role of democratic institutions in promoting ethics, integrity and accountability. She first provided an overview of the Office of the Public Protector (OPP), which is a constitutionally mandated ombudsman institution tasked with investigating improper conduct in state affairs, resolving administrative disputes and enforcing remedial action. The OPP functions independently and is empowered to investigate malfeasance and systemic failures, as well as make binding recommendations to uphold the principles of good governance, in line with South Africa's Constitution and the Public Protector Act.

Achievements (initiatives)

Investigations and systemic reform: The Public Protector's Office undertakes own-initiative and referred investigations, including high-profile matters like Phala Phala and systemic corruption in provinces such as KwaZulu-Natal and the Eastern Cape. Case studies presented included reports involving state capture and procurement irregularities, some of which were also raised by the Public Service Commission (PSC).

Institutional strengthening and legislative amendments: The Public Protector said she had advocated for amendments to the Public Protector Act to strengthen whistleblower protection and enhance the binding nature of remedial actions. The office has also led the push for inclusion of oversight mandates under the Executive Members' Ethics Act, enabling accountability of ministers and state executives.

Evolution of oversight and democratic legitimacy: The presentation emphasised the role of the OPP in supporting democratic legitimacy and the evolution of constitutional governance. Key themes included the integration of good governance principles in institutional design and reliance on international best practices like the Venice Principles.

Advocacy for ethical leadership and inter-institutional synergy: The Public Protector's Office champions ethical leadership through engagement with Parliament, Chapter 9 institutions and oversight forums. The speaker stressed the importance of integrity in appointments and collaboration with civil society and media as crucial to preventing irregularities and promoting transparency.

Challenges/lessons learnt

Despite its broad mandate, Adv. Gcaleka explained, the OPP faces limitations in the enforceability of remedial actions and inadequate compliance by state institutions. There is also a need to modernise investigative tools and increase inter-institutional collaboration to ensure meaningful impact. Public participation in anti-corruption is also hindered when findings are not implemented or delayed.

Recommendations

The presenter emphasised several recommendations:

- Legislation should be amended to give Public Protector findings automatic binding effect unless set aside by a court.
- It is also important for the OPP to strengthen protection for whistle-blowers and mandate compliance through inter-institutional accountability mechanisms.
- Collaboration needs to be enhanced with Parliament, the judiciary and civil society.
- The office should provide targeted ethics training for senior public officials and introduce integrity vetting processes.

Questions and Discussions

Advocate Lauren, from the Human Rights Commissioner, asked about the enforceability of the Public Protector's remedial powers, especially under the Executive Members' Ethics Act. Adv. Gcaleka clarified that recommendations made under the Act are binding unless challenged in court and emphasised the role of Parliament in tabling reports and overseeing implementation.

A delegate from Ghana asked whether institutions failing to implement recommendations can be compelled. Adv. Gcaleka noted that her office could escalate non-compliance through legal proceedings and bring matters before the National Assembly.

A Namibian delegate inquired about the relationship between ombudsman institutions and public administration. Adv. Gcaleka explained that the Public Protector plays a mediatory role and has powers of civil litigation and systemic investigations.

An African Union (AU) observer queried how administrative commissions contribute to democratic governance. Adv. Gcaleka responded that they provide legitimacy, ensure compliance and serve as guardians of constitutional values, citing examples like Armscor, Oilgate and Sanlam.

AU Advisory Board Against Corruption (AUABC): the role of non-state actors in anti-corruption efforts

Yvonne, Chibiya, Vice Chair of the African Union Advisory Board Against Corruption (AUABC)

Yvonne, Vice Chair of the African Union Advisory Board Against Corruption (AUABC), presented on the role of non-state actors in advancing anti-corruption objectives across the African continent. She explained that the AUABC, headquartered in Arusha, Tanzania, is mandated to promote and encourage the adoption of anti-corruption measures in line with the African Union Convention on Preventing and Combating Corruption (AUCPCC). It supports state parties through monitoring, advisory services and partnerships with non-state actors, civil society, the media and the private sector.

Achievements

Multi-stakeholder engagement mechanisms: The AUABC has institutionalised the *Annual Non-State Actors Forum*, which brings together civil society organisations, private sector players and media representatives to contribute to the anti-corruption agenda. These platforms encourage knowledge sharing and collective accountability.

National review missions: The board has also facilitated national anti-corruption performance reviews in member countries, enabling peer assessment and shared learning. These reviews highlight implementation progress and identify capacity gaps.

Media and advocacy networks: The speaker detailed how a *Network of African Media Practitioners Against Corruption* had been established to support investigative journalism and improve public awareness. This initiative plays a critical role in promoting transparency and tracking illicit financial flows.

Strategic partnerships and MoUs: The AUABC has signed several memoranda of understanding (MoUs) with non-state actors and regional bodies to foster co-ordinated responses to corruption and expand outreach activities. These partnerships help align anti-corruption efforts with continental development goals.

Challenges / lessons learnt

The presentation observed that a key challenge is the uneven ratification of the AUCPCC by member countries, limiting full regional integration. Additionally, non-state actors often face resource constraints and political resistance, which hinder effective participation. However, it was emphasised that inclusion and tailored capacity building have shown positive impacts in countries that have embraced civil society collaboration.

Recommendations

The speaker highlighted several recommendations:

- It is important for the AUABC to encourage all member countries to ratify and domesticate the AUCPCC.
- It should also strengthen capacity-building support to civil society and media organisations.
- Non-state actor engagement should be institutionalised in national anti-corruption frameworks.
- Promoting regional co-operation platforms is crucial to harmonise best practices.
- The board should also utilise non-prescriptive, needs-based support approaches tailored to member countries.

Questions and Discussions

TI (Transparency International) asked about the ability of non-state actors to influence government implementation. Yvonne emphasised that while influence varies, AUABC uses review mechanisms and reporting to hold states accountable and ensure follow-up on commitments.

A delegate from Malawi asked how AUABC assists civil society in non-democratic environments. Yvonne acknowledged these contexts but reaffirmed AUABC's commitment to building safe platforms for engagement and offering technical support.

A Namibian representative inquired about media protection. Yvonne explained that the Media Practitioners Network provides a collaborative safety mechanism and that the AUABC advocates for media freedom as a prerequisite for accountability.

Country presentation by Nigeria

Ola Olukoyede, Executive Chairman, Economic and Financial Crimes Commission (EFCC)

Economic and Financial Crimes Commission (EFCC), Nigeria

The Economic and Financial Crimes Commission (EFCC) of Nigeria is the country's leading anti-corruption agency, tasked with investigating and prosecuting financial and economic crimes, including fraud, money laundering and cybercrime. Led by Executive Chairman Ola Olukoyede, who presented on behalf of the commission, the EFCC operates under a multifaceted mandate that spans investigation, prevention, asset recovery and public education. The agency plays a critical role in Nigeria's efforts to promote transparency and accountability, and it actively collaborates with regional and international organisations to combat transnational financial crimes.



Ola Olukoyede, Executive Chairman, Economic and Financial Crimes Commission (EFCC), Nigeria

Achievements (initiatives)

Investigation, prevention and prosecution structure: The speaker explained that the EFCC has restructured its operations into four strategic departments to enhance investigative and prosecutorial effectiveness. These are the enforcement, prevention, legal and prosecution, and public engagement units. Special initiatives such as the Cybercrime Taskforce and Anti-Forex Malpractice Unit have targeted new forms of digital and financial fraud. The Forex Malpractice Taskforce has become a key response mechanism to curb illegal currency trading.

Enhanced enforcement performance: The commission reported a significant number of convictions in 2024, with 792 suspects arrested and prosecuted for offenses ranging from pyramid schemes to cryptocurrency fraud. A notable example includes the successful prosecution of major cybercrime networks such as the Binance crypto fraud syndicate, which led to the recovery of millions in digital assets.

Asset recovery and financial gains: In monetary terms, the EFCC has recovered approximately US\$533 million in illicit assets. This includes properties, vehicles and funds linked to organised financial crime networks. Through advanced tracing methods and collaboration with global enforcement agencies, the EFCC has repatriated assets from foreign jurisdictions.

Public engagement and strategic awareness: The EFCC launched the *EFCC Radio Station* – a public engagement platform focused on anti-corruption education – and scaled up its digital outreach through X (formerly Twitter), Facebook and Instagram. Strategic initiatives include an inter-agency judiciary retreat involving more than 80 judges and prosecutors to foster alignment on prosecution strategies and judicial co-operation.

Challenges / lessons learnt

Despite its achievements, the speaker said, EFCC faces systemic challenges such as inter-agency co-ordination gaps, prolonged judicial processes and legal complexities in transnational asset recovery.

One key insight shared was that asset tracing in foreign banks (for example, Switzerland) requires co-operation through mutual legal assistance treaties (MLATs) and the engagement of qualified international advisers. Additionally, the need for stronger public confidence was noted as a persistent challenge in corruption prosecution.

Recommendations

To enhance effectiveness, the EFCC recommends the following:

- It is important for it to strengthen bilateral and multilateral legal assistance frameworks for quicker asset recovery.
- The EFCC should invest in AI-driven forensic analytics and digital evidence platforms.
- The commission should advocate for the creation of special economic crimes courts to fast-track trials.
- Structured ethics and integrity frameworks should be established within public institutions.
- Regional co-operation should be enhanced through forums like Network of National Anti-Corruption Institutions in West Africa (NACIWA) and joint operations.

Questions and Discussions

An EOCO Ghana representative asked three key questions:

- (1) Do you have jurisdiction across borders?
- (2) Who funds your operations?
- (3) How do you recover money from Swiss banks?

Ola Olukoyede responded that EFCC works under Nigerian jurisdiction but uses MLATs and international co-operation for cross-border recovery. Operations are primarily state funded, with international support received for capacity-building projects. For Swiss recoveries, EFCC collaborates with INTERPOL, StAR and UNODC.

Adv. Andy Mothibi, South Africa SIU Head, asked how the EFCC anticipates and detects emerging financial crimes. EFCC explained that the Fraud Risk Assessment and Control Unit uses predictive analytics, open-source intelligence (OSINT), and whistle-blower platforms to proactively identify fraud trends, such as cyber scams and Forex fraud.

A representative from the Nigerian Civil Society Network queried how EFCC builds and maintains public trust amid criticisms. EFCC acknowledged that public scepticism remains, but emphasised initiatives like EFCC Radio, community town halls and a youth digital volunteer corps for outreach.

A NACIWA delegate (Benin) inquired about EFCC's integration into regional enforcement efforts. EFCC explained its lead role in organising NACIWA's capacity development programmes and co-hosting joint investigations, particularly around digital currency fraud.

Understanding the use of AI in the fight against financial crime

Frank Christian Lieber, Genesis Consultancy, Dubai, UAE

Frank Lieber, representing a Swiss-based AI solutions firm partnered with Genesis, delivered a thought-provoking presentation on the potential and limitations of artificial intelligence (AI) in combatting financial crime. His focus was on the integration of ethical leadership and human-centric transformation in a digital era where tools like generative AI, deep speech and co-pilots are gaining traction in compliance, fraud detection and investigation fields. The Swiss company he represents has been involved in supporting digital transformation and leadership development initiatives in regulatory and compliance environments across Europe and Africa.

Achievements

Framing AI as a supportive tool, not a replacement: Mr Lieber stressed that AI is not a panacea for all compliance and financial crime challenges. The success of AI deployment depends on effective leadership, strong governance frameworks and a clear understanding of AI's limitations. Technologies like Copilot, DeepSeek and Gemini were highlighted as emerging tools that support but do not replace human judgment.

Leadership development in the age of AI: Genesis's approach focuses on equipping executives with the skills to drive transformation from defensive to proactive strategies. Leadership must be anchored in ethics, integrity and cyber-resilience. Organisations need leaders who understand both AI capabilities and their ethical implications, including the dangers of over-reliance and 'hallucinations' in AI outputs.



Frank Christian Lieber, Genesis Consultancy, Dubai, UAE

Strategic shift from defence to offence: The presenter emphasised the need for anti-corruption agencies to move from defensive postures (for example, basic compliance) to proactive engagement – that is, leveraging AI for strategic foresight, pattern recognition and pre-emptive detection of financial crime.

Integration of ethics, cybersecurity and AI skills: AI implementation must occur alongside investments in ethics training, cyber security capacity and interdisciplinary collaboration. Genesis champions a holistic view that places human values at the centre of AI-driven digital transformation.

Challenges / lessons learnt

The speaker went on to observe that up to 85 per cent of AI implementation projects fail due to poor co-ordination, lack of strategic clarity and inadequate change management. Many organisations also waste funds by investing in technology before aligning it with their processes and human capacity.

Another challenge, he said, is the existence of disjointed databases and unintegrated systems across government departments, which hinders unified digital transformation.

Recommendations

The speaker made the following recommendations:

- AI should be treated as a co-pilot, not an autopilot – augmenting, not replacing, decision-making.
- Leaders should be trained to align digital strategy with human ethics and legal safeguards.
- It is important for organisations to invest in building advisory teams comprising business engineers, ethicists, and cybersecurity experts.
- Agencies should adopt a 'human-centred' digital transformation model that prioritises inclusion and adaptability.
- Organisations should strengthen governance, data protection and ensure non-reliance on unverified AI outputs.

Questions and Discussions

Adv. Andy Mothibi from the SIU asked how AI could be used effectively in investigation environments and what practical use cases would yield the most benefit. Mr Lieber responded that while AI has potential for pattern recognition and document summarisation, its effectiveness depends on strategic alignment, ethical oversight and human supervision.

A Namibian delegate inquired about 'hallucinations' in AI and how organisations can guard against misleading outputs. Mr Lieber cited an MIT (Massachusetts Institute of Technology) study highlighting the risks of hallucinations and emphasised rigorous data governance, model validation and critical human review as essential safeguards.

A Malawi delegate asked how agencies could build leadership pipelines to navigate AI disruption. Mr Lieber emphasised integrating soft-skills training, digital literacy and values-based leadership into capacity-building programmes for young leaders.

A Kenyan representative sought insights into balancing investment in AI infrastructure with ongoing compliance costs. Mr Lieber suggested that AI should be deployed gradually, starting with high-yield use cases, and aligned with return on investment and policy priorities to ensure sustainability.

Beyond criminal convictions: using the Proceeds of Crime Act to recover assets from criminals

Amaechi Nsofor and Ravi Nayer, Grant Thornton UK LLP

Grant Thornton is a leading global accounting and advisory firm with extensive expertise in asset recovery, forensic accounting, insolvency and regulatory compliance. Represented by Amaechi Nsofor (Barrister, London) and Ravi Nayer, the firm offers technical assistance to governments and anti-corruption agencies through financial investigations, management receiverships and confiscation proceedings. Grant Thornton's involvement in the conference focused on the role of civil remedies and insolvency procedures in enhancing anti-corruption outcomes beyond criminal convictions.

Achievements

Use of parallel criminal and regulatory proceedings: The presentation emphasised how successful asset recovery often hinges on the use of both criminal and civil/regulatory tools. This includes co-ordinating criminal prosecutions with regulatory enforcement (such as financial sanctions) and civil asset recovery (for example, freezing or confiscating assets). Grant Thornton illustrated how this strategy increases recovery success and helps target proceeds of crime held offshore.

Strategic selection of defendants and asset management: Mr Nsofor discussed the importance of selecting appropriate defendants and ensuring that assets are restrained early. Strategic asset management involves protecting assets from dissipation or destruction during proceedings. This is done by appointing management receivers to secure and maintain asset value throughout litigation.

Confiscation orders and enforcement receivers: The speakers detailed the value of management and enforcement receiverships, highlighting how appointed professionals can oversee, restructure and safeguard assets until they are lawfully



Amaechi Nsofor, Partner, Insolvency and Asset Recovery, Grant Thornton UK LLP

returned or confiscated. Grant Thornton emphasised how insolvency practitioners and forensic accountants work together to trace hidden assets and enforce confiscation orders.

Insolvency as a tool for asset recovery: One of the most effective legal remedies discussed was the strategic use of insolvency proceedings. Through this route, a target can be declared bankrupt, which compels asset disclosure and allows liquidators to investigate antecedent transactions. It was highlighted that this is often more effective than criminal prosecution alone.

Challenges / lessons learnt

A major challenge discussed was the complexity of cross-border asset tracing, especially when assets are hidden in foreign jurisdictions like Switzerland. Grant Thornton noted the importance of having clear jurisdictional mandates and well-resourced teams, including advisers who understand the relevant legal frameworks. They also warned that pursuing asset recovery without co-ordinated strategies often leads to failure.

Recommendations

Grant Thornton made the following recommendations:

- Agencies should employ management and enforcement receivers early to protect and secure assets.
- It is important to use a multidisciplinary team approach – combining legal, forensic accounting and insolvency expertise.
- Agencies should establish clear inter-agency protocols for parallel regulatory and criminal action.
- Institutional capacity needs to be built for non-criminal remedies such as insolvency and civil confiscation.
- It is crucial to encourage knowledge sharing and training across jurisdictions.



Ravi Nayer, Insolvency and Asset Recovery, Grant Thornton UK LLP

Questions and Discussions

A Ghanaian EOCO delegate asked about how to deal with recovery in situations where the proceeds of crime are in another country. Amaechi Nsofor emphasised the need for early co-ordination with foreign jurisdictions through legal tools such as mutual legal assistance and the involvement of experienced recovery specialists.

South Africa SIU (Adv. Mothibi) inquired about best practices in initiating management receiverships. Mr Nayer responded that receivers should be appointed as soon as an asset is identified to avoid value erosion and that jurisdictions should legislate clear frameworks for management receivers.

A Namibian delegate sought clarity on how asset restructuring works in receiverships. The presenters explained that restructuring often involves stabilising businesses, managing liabilities and preparing the asset for disposal in a way that maximises value.

An Anti-Corruption Agency representative from Kenya asked about the role of insolvency practitioners in criminal matters. Grant Thornton clarified that while criminal prosecutors lead on offenses, insolvency practitioners provide complementary powers for asset tracing and disclosure, often with stronger civil legal tools.

Day 5: Friday 9 May 2025

Communique

The Communiqué

THE 15TH REGIONAL CONFERENCE AND ANNUAL GENERAL MEETING OF HEADS OF ANTI-CORRUPTION AGENCIES IN COMMONWEALTH AFRICA, CAPE TOWN, SOUTH AFRICA

THEME:

Enhancing Inclusive Participation of State and Non-State Actors to Prevent and Combat Corruption

RESOLUTIONS

WE, the Heads and Representatives of Anti-Corruption Agencies in Commonwealth Africa, meeting at the 15th Commonwealth Regional Conference of Heads of Anti-Corruption Agencies in Africa, hosted by the Government of the Republic of South Africa and organized in collaboration with the Commonwealth Secretariat, from 5–9 May 2025 in Cape Town, South Africa:

NOTING with sincere appreciation the invaluable support and warm hospitality of the government and people of South Africa under the leadership of His Excellency President Cyril Ramaphosa, and the efforts of the organizing agencies in successfully hosting the Conference;

THANKING the Commonwealth Secretariat and all partner institutions for their continued dedication and collaboration in convening this annual conference and promoting anti-corruption efforts across the Commonwealth;

COMMENDING the diverse participation of stakeholders including state and non-state actors, development partners, civil society, the private sector, and international agencies, whose contributions enriched discussions and strengthened partnerships;

RECOGNIZING the relevance and the need for the implementation of the United Nations Convention against Corruption (UNCAC) and the African Union Convention on Preventing and Combating Corruption;

ACKNOWLEDGING the transformative potential of Artificial Intelligence (AI) and related technologies in closing Africa's integrity gap by promoting transparency, accountability, and behavioural change in both public and private sectors;

HAVING deliberated extensively on the following key topics and challenges, and reached consensus on advancing joint action and reforms to:

- a. Promote mutual cooperation between state and non-state actors to mitigate corruption risks in development;
- b. Address gender dimensions of corruption, recognizing their unique impact and the need for gender-responsive strategies;
- c. Strengthen strategies and legal frameworks to improve the effectiveness, independence, and sustainability of Anti-Corruption Agencies;

5 Joseph Whittal

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Commission on
Human Rights and
Administrative
Justice.

6 Abdul Basim
Azhar

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Economic and
organised crime
office, Lagos

7 ABDI A. MOHAMUD
CEO, EACC, KENYA

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8 Maphemu Mkhathwa

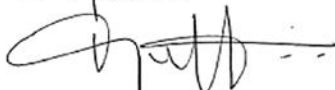
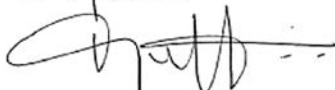


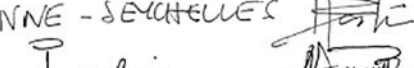



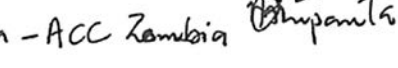
Acting Commissioner
Anti-Corruption Commission
Eswatini

9. Adv. Brig Mantsp Sello, AG CEO

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11 Hillary Chitomba: Anti-Corruption Bureau

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12. Andre Robert Scaruthun - financial Crimes Commission - Mauritius 
13. Paulus K. Noya ACC NAMIBIA 
14. Mr. Musa Aekumu Aiyegun, son 
15. Mr. Olu Olukoyede, 
16. HENRY GILBERT BASTIENNE - SEICHELLES 
17. AROUNA Kokouir Lardjei 
18. JORAM MAGEZI
for Inspectorate of Government
of Uganda 
19. Crispin Chalamila DG-PCIB 
20. Monica Chipanta Mwansa - ACC Zambia 

Signing of the Communiqué by Heads of ACAs



Adv. Andy Mothibi, Head and Chief Executive, Special Investigating Unit, South Africa



Botlhale Makgekgenene, Director General Directorate on Corruption and Economic Crime, Botswana



Rev. Dr. Dieudonné Massi Gams, Chairman, National Anti-Corruption Commission, Cameroon



Samuel Darko, Director for Strategy, Research, and Communication, Office of the Special Prosecutor, Ghana



Dr. Joseph Whittal, Commissioner, Commission on Human Rights and Administrative Justice, Ghana



Abdulai Bashiru Dapilah, Ag. Executive Director, Economic and Organised Crimes Office, Ghana



Abdi Mohamud, MBS, Secretary/Chief Executive Officer, Ethics and Anti-Corruption Commission, Kenya



Maphevu Mkhathshwa, Ag Commissioner, Anti-Corruption commission, Eswatini



Adv Brig Mantso Zacharia Sello, Director General, Directorate on Corruption and Economic Offence, Lesotho



Hillary Chilomba, Deputy Director-General, Anti-Corruption Bureau, Malawi



Robert. Seeruthun, Ag Head, Financing of Drug Dealing Unit, Financial Crimes Commission, Mauritius



Paulus Kalombo Noa, Director-General, Anti-Corruption Commission (ACC), Namibia



Dr Musa Adamu Aliyu SAN, Chairman, Independent Corrupt Practices and other Related Offences Commission, Nigeria



Nwanneka Joseph Nwokike - Director, Sokoto Zonal Command, Economic and Financial Crimes Commission Nigeria



Gilbert Bastienne, Deputy Commissioner, Anti-Corruption Commission, Seychelles



Lardja Kokouvi AROUNA, Chief Delegation, ACA HAPLUCIA, Togo



Magazi Joram, Director for Leadership Code, Inspectorate of Government (IGG), Kampala



Crispin F Chalamila, Director General, Prevention and Combating of Corruption Bureau, Tanzania



Monica Chipanta Mwansa, Deputy Director General, Anti-Corruption Commission, Zambia



Adv Andy Mothibi, Head and CEO, SIU, South Africa and Dr Roger Koranteng, Commonwealth secretariat, UK

Annex I: Conference Agenda

Monday, 5 May 2025

Time	Topic	Resource Person(s)
Master of Ceremony for Opening: Mr Kaizer Kganyago, Chief Relations and Communication officer, SIU Conference Co-ordinator: Dr Roger Koranteng, Commonwealth Secretariat, UK		
08:00–08:50	Registration of Heads of ACAs and Invited Guests <u>ALL GUESTS TO BE SEATED BY 08:50 HRS</u>	The Secretariat
09:00–09:10	Arrival of Guests of Honour followed by the National Anthem of Republic of South Africa by the South Africa Police Service Band	Protocol Team
09:10–09:20	Welcome Remarks	Adv. Andy Mothibi Chief Executive and Head Special Investigating Unit South Africa
09:20–09:30	French Embassy Partnership and Collaboration	His Excellency David Martinon French Ambassador to the Republic of South Africa
09:30–09:35	Video Presentation	Showcase the SIU Anti-Corruption and Cyber Academy, Training Programmes, Facilities and Success Stories
09:35–09:45	Conference Overview, Objectives and Expected Outcomes	Dr Roger Koranteng Head, Public Sector Governance, Commonwealth Secretariat, UK
09:45–09:55	Cultural Interlude	
09:55–10:05	Remarks by Assistant Secretary-General of the Commonwealth	Prof. Luis Franceschi Assistant Secretary-General Commonwealth Secretariat

(Continued)

Time	Topic	Resource Person(s)
10:05–10:10	Musical Interlude	South Africa Police Service Band
10:10–10:20	Remarks by the Minister of Justice and Constitutional Development and introduction of the Guest of Honour	Hon. Mmamoloko Kubayi
10:20–10:40	Keynote Address and Official Opening by the Guest of Honour	HE Cyril Ramaphosa, President of the Republic of South Africa.
10:40–10:50	Vote of Thanks	Chairperson, Association of Anti-Corruption Agencies in Commonwealth Africa and Executive Director, EOCO, Ghana
10:50–11:00	Official Photograph	Heads of Delegation with the President of the Republic of South Africa
11:00–11:30 Refreshments		
11:30–12:00	Topic: 'Challenges and Solutions to Implementing Recommendations of Commissions of Enquiry relating of Anti-Corruption cases'	Chair Prof. Edward Hoseah
	Adv. Lauren Kohn Founder and Director Law and Governance Academy of Southern Africa (LAGASA) South Africa	
	Questions and Discussion	
12:00–13:00	Presentations by Countries (max 20 mins)	Chair Cameroon
	<ul style="list-style-type: none"> • Botswana • Tanzania 	
	Questions and Discussions	
13:00–14:00 Lunch Break		
14:00–15:00	Presentations by Countries (20 mins each)	Chair Malawi
	<ul style="list-style-type: none"> • Lesotho • Seychelles 	
	Questions and Discussions	
15:00–15:30	Topic: 'Closing Africa's Integrity Gap with Ai-Enabled Systems That Induce Behavioural Change'	Chair Ghana (CHRAJ)
	Dr Olu Ajayi CEO, Maddison Pine London, UK	
	Questions and Discussions	

(Continued)

Time	Topic	Resource Person(s)
15:30–16:00	Tea – Coffee Break	
16:00–16:30	<p>Topic: 'Institutional Empowerment: A Path to Independence, Effectiveness, Transparency and Accountability'</p> <p>Samuel Bwana Manager at the Integrity Vice Presidency World Bank Group Washington DC, USA</p>	Chair Nigeria (ICPC)
	Questions and Discussions	
16:30–17:00	<p>Topic: 'Gender and Corruption'</p> <p>Prof. Sope Williams Faculty of Law Stellenbosch University South Africa</p>	Chair Rose Seretse
	Questions and Discussions	
7:00 pm	Official Welcome Dinner BY INVITATION	

Tuesday, 6 May 2025

Time	Topic	Resource Person(s)
09:00–09:30	<p>Topic: Is our fight against corruption in South Africa more effective now than it was before the State Capture Commission?</p> <p>Former Chief Justice Zondo c/o Constitutional Court of South Africa Braamfontein South Africa</p>	Chair South Africa
	Questions and Discussions	
09:30–10:00	<p>Topic: 'Strategies and legal frameworks for improving the effectiveness of Anti-Corruption Agencies'</p> <p>Francesco Checchi United Nations Office on Drugs and Crime Vienna Austria</p>	Chair Nigeria (EFCC)
	Questions and Discussions:	
10:00–10:30	Tea – Coffee Break	
10:30–12:00	<p>Presentations by Countries (20 mins each)</p> <ul style="list-style-type: none"> • Mauritius • Uganda • South Africa 	Chair Seychelles
	Questions and Discussions	

(Continued)

Time	Topic	Resource Person(s)
12:00–13:00	Topic: 'Creating Virtuous Circles of Integrity and Fighting Corruption Effectively'	Chair Uganda
	Dr Roger Koranteng Head, Public Sector Governance Commonwealth Secretariat, UK	
	Questions and Discussions	
13:00–14:00	Lunch Break	
14:00–15:15	Presentations by Countries (20 mins each)	Chair Togo
	<ul style="list-style-type: none"> • Zambia • Namibia • Mozambique 	
	Questions and Discussions	
15:15–16:30	Presentations by Countries (20 mins each)	Chair Ibrahim Magu
	<ul style="list-style-type: none"> • Ghana (EOCO) • Ghana (OSP) • Ghana (CHRAJ) 	
	Questions and Discussions	
16:00–16:30	Tea – Coffee Break	
16:30–17:00	Topic: 'Building Integrity and Anti-corruption in the Defence Sector: A framework for better governance'	Chair Lesotho
	Dr Michael Ofori-Mensah Head of Research Defence and Security Transparency International Defence and Security London, UK	
	Questions and Discussions	

Wednesday, 7 May 2025

Time	Topic	Resource Person(s)
09:00–09:30	Topic: 'Mozambique's Tuna Bond Fraud and the English Commercial Court's Combatting of Corruption'	Chair Mauritius
	Sarah Gabriel/ Jonathan Tickner Peters and Peters Solicitors LLP London, UK	
09:30–10:30	Presentations by Countries (20 mins each)	Chair Ghana (OSP)
	<ul style="list-style-type: none"> • Kenya • Eswatini 	
	Questions and Discussions	

(Continued)

Time	Topic	Resource Person(s)
10:30–11:00	Topic: 'Laundering the proceeds of corruption, challenges and solutions for investigators and prosecutors'	Chair Sierra Leone
	Simon Marsh Head, Southern and Eastern Africa International Centre for Asset Recovery Basel Institute on Governance Nairobi, Kenya	
	Questions and Discussions	
11:00–11:30		
11:30–12:00	Topic: 'The project to Establish the International Anti-Corruption Court'	Chair Namibia
	Justice Richard Goldstone Integrity Initiatives International Boston, USA	
	Questions and Discussions	
12:00–12:30	Topic: 'Integrity by Design: Preparing an Anti-corruption Legacy for Future Generation'	Chair Dr Michael Ofori
	Thembisio Magajane Institute of Anti-Corruption and Compliance South Africa	
	Questions and Discussions	
12:30–13:00	Topic: 'AML and CFT in the Era of Artificial Intelligence'	Chair Adv. Lauren Kohn
	Shakilla Jhungeer Founder and CEO Genesis Consultancy, Dubai, UAE	
	Questions and Discussions	
13:00–14:00	Lunch Break	
14:00–15:00	Presentations by Countries (20 mins each)	Chair Eswatini
	<ul style="list-style-type: none"> • Togo • Cameroon 	
	Questions and Discussions	
15:00–16:15	Presentations by Countries (20 mins each)	Chair Kenya
	<ul style="list-style-type: none"> • Malawi • Nigeria (ICPC) • Gabon 	
	Questions and Discussions	
16:15–16:30	Tea – Coffee Break	
16:30–17.00	Topic: 'Briefing on G20 Anti-Corruption Working Group under South Africa Presidency'	Chair Zambia
	Adv. Andy Mothibi Chief Executive and Head Special Investigating Unit South Africa	
	Questions and Discussions	

Thursday, 8 May 2025

Time	Topic	Resource Person(s)
09:00–10:00	Presentations by Countries (20 mins each) <ul style="list-style-type: none"> • Sierra Leone • Nigeria (EFCC) 	Chair KK Amoah
	Questions and Discussions	
10:00–10:30	Topic: 'Beyond Criminal Convictions: Using the Proceeds of Crime Act to Recover Assets from Criminals' Amaechi Nsofor Partner, Head of Africa Insolvency and asset recovery Grant Thornton UK LLP	Chair Tanzania
	Questions and Discussions	
10:30–11:00	Topic: 'Understanding the Use of Ai in the Fight Against Financial Crime' Mr Frank Christian Lieber Genesis Consultancy Dubai, UAE	Chair Mr Edmund Kweku Baiden
	Questions and Discussions	
11:00–11:30	Tea – Coffee Break	
11:30–12:00	Topic: “The role of democratic viability Institutions (ombudsmen, mediators and Public Protectors) as critical components of a holistic anti-corruption and good governance system” Adv. Kholeka Gcaleka The Public Protector Republic of South Africa Pretoria South Africa	Chair Botswana
	Questions and Discussions	
12:00–12:30	Topic: “‘Strengthening Integrity and Accountability in the Public Service: The role of Public Service Commissions in combatting corruption in Africa’”. Yasmin E Bacus (Ms) Commissioner, KwaZulu Natal Province Public Service Commission Pietermaritzburg South Africa	Chair Ghana (EOCO)
	Questions and Discussions	
12:30–13:00	Lunch Break – Carry Packed Lunch	
	Sightseeing – ROBBIN ISLAND TOUR. Bus to leave the hotel at 13:00hrs	
19:00–21:00	CLOSING DINNER	Traditional Attire

Friday, 9 May 2025

**ANNUAL GENERAL MEETING OF HEADS OF ANTI-CORRUPTION AGENCIES and
HEADS OF DELEGATION ONLY**

**OTHER ANTI-CORRUPTION AGENCIES' DELEGATES MAY ATTEND
AS OBSERVERS**

Time	Topic	Resource Person(s)
09:00–11:00	Discussion of Communiqué	Dr Roger Koranteng Commonwealth Secretariat
11:00– 11:30	Tea – Coffee Break	
11:30–13:00	Annual General Meeting of the Heads of ACAs or Representatives (AAACoA Secretary will provide Agenda in consultation with Chairperson)	Chairperson AAACoA Dr Roger Koranteng Commonwealth Secretariat
13:00–14:00	Lunch Break	
14:00–15:00	Closing (Media will be invited)	Dr Roger Koranteng Commonwealth Secretariat
	Reading of the Communiqué	
	Remarks by outgoing chairperson	Chairperson AAACoA
	Closing remarks by new chairperson	Incoming Chairperson
15:00–15:30	Tea – Coffee Break – MEDIA ENGAGEMENT	
15:30–19:00	Tour of Cape Town and visit to Groot Constantia wine tour. The package will include guided tours through the Historical Manor House and a five (5)-wine tasting at GC's Production Cellar tasting room.	

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