

The Executive Engine:

Governance and Institutional Reform for a Transformative Zimbabwe

PAPER 4 OF THE BLUEPRINT SERIES | GOVERNANCE AND INSTITUTIONAL REFORM

ABSTRACT

Good governance is not the background to Zimbabwe's transformation. It is the mechanism by which every other reform in this blueprint either succeeds or fails. Monetary stability requires a central bank that cannot be overridden by a finance ministry. Infrastructure investment requires regulators that cannot be captured by the industries they oversee. Agricultural productivity requires property rights that courts will enforce. Diaspora re-engagement requires an institutional environment that talented professionals can trust with their careers and savings. This paper addresses the three structural foundations on which all of this depends: a professional public administration freed from patronage, a judicial system capable of enforcing contracts and property rights at international standards, and an anti-corruption architecture with the institutional power to prosecute rather than merely investigate. The international models are clear — Singapore's meritocratic civil service, the DIFC and Singapore International Commercial Court frameworks, and the constitutional reforms that have given comparable anti-corruption commissions genuine prosecutorial independence. The institutional architecture for Zimbabwe is equally clear. What has been missing is the political settlement required to build it.

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EXECUTIVE SUMMARY

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Every reform proposed in this blueprint series depends on governance to deliver it. Monetary stability requires a central bank that a finance ministry cannot coerce. Infrastructure investment requires regulators that industries cannot capture. Agricultural productivity requires property rights that courts will enforce. Diaspora re-engagement requires an institutional environment that professionals can trust with their careers, their savings, and their families. Without governance reform, the vision of Papers 1 through 3 is an aspiration without an engine.

Zimbabwe's governance challenge is not a shortage of laws. It is a shortage of institutional independence, meritocratic capacity, and accountability enforcement. The country has a Reserve Bank Act that nominally prohibits monetary financing of government — it has been repeatedly overridden. It has a Zimbabwe Anti-Corruption Commission with an investigative mandate — but ZACC cannot prosecute without referring cases to a National Prosecuting Authority widely perceived as politically controlled, creating a catch-and-release cycle that has eroded public trust in anti-corruption enforcement.¹ It has a civil service — one whose technical competency has been systematically hollowed out by patronage appointments that substitute loyalty for expertise.²

This paper proposes reform across three interlocking axes. Axis A addresses public administration: the transition from a patronage-based to a merit-based civil service, modelled on Singapore's Public Service Commission framework but adapted to Zimbabwe's political economy. Axis B addresses the judicial system: the establishment of a specialised commercial and investor court with genuine independence, international jurist participation, and expedited timelines that reduce the sovereign risk premium Zimbabwe pays on every investment. Axis C addresses the accountability engine: constitutional reform granting the Zimbabwe Anti-Corruption Commission direct prosecutorial authority, severing the link between anti-corruption enforcement and executive discretion.

These three axes are not independent reforms. They are mutually reinforcing: meritocratic public administration produces the technically competent officials who design and implement sound policy; independent commercial courts provide the contractual certainty that makes private investment rational; and genuine anti-corruption enforcement creates the consequences that make governance rules binding rather than performative. Together they constitute the institutional architecture without which no amount of vision, financing, or infrastructure investment can achieve durable transformation.



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SECTION 1

1. The Governance Diagnosis: What Is Actually Broken

Before prescribing reform, intellectual honesty requires naming clearly what the specific institutional failures are — not in abstract terms, but in the concrete mechanisms through which Zimbabwe's governance deficit manifests and compounds.

1.1 The Patronage State: How Loyalty Replaced Expertise

The fusion of party, state, and security apparatus commercial interests that characterises Zimbabwe's public administration is not a personal failing of individual officials. It is a structural feature of a political system in which access to the state has been the primary route to economic security for political networks. When appointments to technical positions — in the central bank, in sector ministries, in regulatory bodies, in parastatals — are made on the basis of political loyalty rather than professional competence, the result is predictable and cumulative: competent officials leave or never enter; technically complex decisions are made by people without the expertise to make them well; reform proposals are evaluated by officials whose primary incentive is to maintain the status quo from which their appointment derives; and international partners — DFI lenders, private investors, bilateral donors — identify the capacity gap and reduce their engagement accordingly.

The cost of this patronage system is not simply reduced efficiency. It is the compounding of every other governance failure. A patronage-appointed central bank official is less likely to resist political pressure for monetary financing. A patronage-appointed energy regulator is less likely to resist pressure from politically connected energy companies to maintain below-cost tariffs. A patronage-appointed procurement official is more susceptible to the corrupt relationships with contractors that inflate infrastructure costs and reduce quality. The patronage system is not one problem among many. It is the system that makes every other problem harder to solve.

The deeper structural dynamic that makes patronage so persistent deserves explicit statement: in economies where formal private sector employment is limited and rural subsistence remains the dominant alternative, the state becomes the primary allocator of economic opportunity. When the state is the main employer, the main contractor, the main licensor, and the main distributor of land and mineral rights, access to the state becomes the primary route to economic security for entire networks of people. Politics substitutes for markets as the mechanism by which resources are allocated. Loyalty substitutes for institutional trust as the currency of economic participation. In this environment, meritocratic civil service reform is not merely an administrative change. It is a redistribution of economic

power — which is precisely why it faces the resistance it does, and why that resistance must be engaged politically rather than assumed away technically.

1.2 The Accountability Vacuum: Laws Without Consequences

Zimbabwe's legal framework contains most of the substantive anti-corruption and accountability provisions that a functioning state requires. The Constitution mandates a ZACC with independence and broad investigative powers. The Public Finance Management Act requires fiscal discipline. Procurement regulations require competitive tendering. The problem is not the law on paper. It is the enforcement gap that renders the law largely performative.

ZACC's structural weakness is definitional: it can investigate but cannot prosecute.¹ Every case that ZACC builds against a corrupt official must be referred to the National Prosecuting Authority for prosecution. The NPA, widely perceived as subject to executive influence, has discretion to decline prosecution without providing reasons. The result is a cycle in which high-profile corruption investigations produce arrests and headlines but rarely result in conviction — the 'catch-and-release' pattern that has characterised anti-corruption enforcement in Zimbabwe and across Africa wherever accountability bodies lack prosecutorial independence. The public learns, rationally, that the anti-corruption system is not a genuine deterrent. The behaviour it is meant to deter continues.

Asset disclosure requirements for public officials exist in various forms but are incompletely enforced and not publicly accessible in a format that enables meaningful citizen scrutiny. The beneficial ownership of companies holding government contracts is not systematically disclosed. Infrastructure procurement — one of the highest-risk areas for corruption globally — is conducted through processes that lack the transparency, publication standards, and independent oversight that would deter corrupt arrangements at the point of contract award rather than attempting to detect them after the fact.

1.3 The Contractual Uncertainty Tax: What Weak Courts Cost

Every investment decision in Zimbabwe carries an implicit contractual uncertainty premium. Investors who cannot rely on contracts being enforced by an independent, competent, and timely court system either do not invest, invest at a lower scale than they otherwise would, or require a higher return to compensate for the risk that contractual obligations will be unilaterally altered, ignored, or subject to years of domestic litigation before resolution. This premium is real, substantial, and directly reducible by judicial reform.

Zimbabwe's commercial court system faces three interconnected challenges. First, capacity: commercial case backlogs mean that straightforward contract disputes can take years to

resolve, imposing carrying costs on claimants and creating incentives for out-of-court settlement on terms that may not reflect the legal merits. Second, perceived independence: investors who believe that judicial decisions in politically sensitive commercial cases reflect executive preference rather than legal analysis will not rely on domestic courts to protect their contracts. Third, expertise: complex infrastructure PPP contracts, mining concession agreements, and financial instruments require judges with commercial law expertise that Zimbabwe's domestic judiciary currently does not possess at sufficient depth for investor confidence.

The consequence is visible in Zimbabwe's investment profile. International infrastructure developers, mining companies, and financial institutions routinely require international arbitration clauses in contracts with Zimbabwean counterparties specifically because they do not trust the domestic court system to enforce agreements equitably. Each such clause is an implicit statement of non-confidence in Zimbabwe's institutions — and it adds cost, complexity, and delay to every deal.

SECTION 2

2. Axis A: From Patronage to Meritocracy — Rebuilding Public Administration

The transition from a patronage-based to a merit-based civil service is the foundational reform on which everything else depends. It is also the most politically difficult: it directly threatens the appointment power that political networks rely on to maintain loyalty and distribute economic reward. A blueprint that does not name this difficulty honestly is not serious about reform. But the difficulty does not make the reform optional — it makes it the test of whether the political settlement in favour of transformation is genuine.

2.1 The Independent Public Service Commission

Zimbabwe's Public Service Commission exists but does not operate with genuine independence from executive direction. The reform proposed here is not to create a new institution but to constitutionally and legislatively insulate the existing one: fixed-term Commissioner appointments requiring parliamentary supermajority for removal; an explicit mandate to fill all technical and administrative positions below the rank of Permanent Secretary through competitive, standardised processes; and a published record of every appointment, the process by which it was made, and the qualifications of the appointee.

The Singapore model is the most instructive international reference, though its direct transplantation is neither possible nor desirable. Singapore's Public Service Commission operates under a framework in which meritocracy is institutionalised at every level — competitive scholarship programmes that identify and develop talent from early education, standardised competency assessments for all public sector entry, performance-based promotion systems in which tenure does not protect mediocrity, and a compensation structure that benchmarks senior civil service salaries against private sector comparators to retain talent that could otherwise emigrate or enter the private sector.³ Senior civil servants in Singapore remain in post across changes of political leadership precisely because their appointment derives from demonstrated competence rather than political allegiance.

Zimbabwe cannot replicate Singapore in a decade. But it can apply the same principle: recruitment on competence, advancement on performance, compensation competitive enough to attract capable people, and a firewall between political direction and administrative appointment that is structural rather than merely aspirational.

2.2 Competitive Examination and Technical Cadre Framework

All positions in the civil service above a defined grade threshold — and all positions in the IDU, independent regulatory bodies, and parastatal management — will be filled through a standardised, published, competitive process with independent assessment panels. The process is as follows:

- Open advertisement: all vacancies published on a central government careers portal and in national newspapers, with position description, required qualifications, and assessment criteria stated explicitly
- Standardised examination: technical roles — economists, engineers, procurement specialists, lawyers, financial analysts — assessed through a standardised competency examination developed and administered by the Public Service Commission with no ministerial involvement in question-setting or marking
- Independent panel interview: shortlisted candidates interviewed by a panel that must include at least one member with no connection to the recruiting ministry — either from a different ministry, from the private sector, or from an academic institution — and whose assessment is recorded and published
- Public appointment register: every appointment above a defined grade published, with the candidate's qualifications, the panel's assessment score, and any alternative candidates considered. This transparency is the enforcement mechanism against manipulation of the process

Guarding Against Elite Capture of Meritocracy

A meritocratic civil service recruitment system carries its own internal vulnerability: meritocracy can itself be captured by elite networks. When access to the best examination preparation, the most prestigious educational credentials, and the professional networks that produce strong panel interview performance is concentrated among urban elites, graduates of a small number of schools, and families with political connections, the examination system produces a technically credentialled but socially homogeneous appointee class that perpetuates privilege under a different legitimating logic. Zimbabwe's history of educational inequality — between urban and rural schools, between well-resourced and under-resourced institutions — means this risk is real and must be designed against from the outset.

- Blind marking and anonymous examination processing: candidate identities, schools attended, and family backgrounds withheld from examiners and panel interviewers until after assessment scores are recorded, preventing the unconscious or deliberate favouring of candidates from elite networks
- Geographic and socioeconomic diversity monitoring: the Public Service Commission publishes annual disaggregated data on the geographic origin, educational background, and socioeconomic profile of appointees, enabling parliament and civil

society to identify patterns of concentrated elite recruitment and trigger corrective action before capture becomes entrenched

- Provincial examination centres: standardised examinations administered at centres in all ten provinces simultaneously, ensuring that candidates from rural and secondary city backgrounds are not disadvantaged by having to travel to Harare or Bulawayo to sit assessments
- Talent identification partnerships: formal partnerships between the PSC and rural schools, community colleges, and technical training institutions to identify high-potential candidates who would not self-select into civil service applications without active outreach — building the pipeline that diversity monitoring alone cannot create

2.3 The Technical Specialists Pay Framework

Zimbabwe cannot attract and retain the engineers, economists, regulatory lawyers, and financial specialists that its reform programme requires at civil service pay scales that are significantly below private sector equivalents. The standard civil service pay structure is appropriate for generalist administrative roles; it is not appropriate for the specialist technical functions that infrastructure regulation, monetary policy, procurement management, and digital governance require.

This blueprint proposes a separate Technical Specialists Pay Framework — a distinct compensation structure for defined technical roles in the civil service, IDU, and regulatory bodies, benchmarked annually against private sector comparators and funded through a combination of infrastructure programme budgets and DFI technical assistance grants. The framework is not a blanket salary increase for all civil servants. It is a targeted instrument for the specific roles where the talent market is genuinely competitive and where the cost of failing to compete is the continued brain drain that has stripped Zimbabwe's public institutions of exactly the capacity they need most.

The political economy of this reform is manageable precisely because it is targeted rather than general. It does not threaten the overall wage bill or create broad distributional conflict. It simply acknowledges that a central bank economist who could earn three times their salary in the private sector or in the diaspora needs a different compensation calculation than an administrative clerk, and that Zimbabwe cannot build the institutional capacity it needs while pretending otherwise.

A critical fiscal safeguard deserves explicit statement. Introducing specialist pay premiums during Phase One stabilisation — when fiscal discipline is most important and Paper 2's deficit caps are most binding — creates a real risk of undermining the monetary framework if not

structured carefully. This blueprint therefore proposes that the Technical Specialists Pay Framework be initially co-financed through a ring-fenced Development Partner-Backed Capacity Endowment Fund, rather than through domestic budget appropriation alone.

The Endowment Fund is financed through multilateral development bank capacity-building grants — from the African Development Bank, UNDP, World Bank institutional development facilities, and bilateral technical assistance partners — specifically earmarked for salary top-up for certified regulatory economists, monetary policy specialists, infrastructure lawyers, and procurement professionals in defined government roles. The Fund operates as a transparent, audited facility with published beneficiary roles, payment amounts, and performance requirements. As domestic tax revenues expand through informal sector formalisation, infrastructure user-fee dividends, and broadened mineral royalty collection — and as Zimbabwe achieves the single-digit inflation and currency stability targets established in Paper 2, which serve as the macroeconomic prerequisite for activating the full specialist pay tier structure on domestic funding — the fiscal expansion that the wider blueprint programme is designed to produce — the state systematically phases out donor co-financing, absorbing the specialist payroll entirely into the domestic budget by Year 5. The Endowment Fund is therefore explicitly transitional: a bridge that maintains fiscal discipline during stabilisation while building the institutional capacity that eventually makes domestic self-financing of the specialist cadre sustainable.

2.4 Breaking the Patronage Network: The Political Economy Challenge

The honest dimension of public administration reform that most policy documents omit is this: the people who benefit from the patronage system are not passive recipients of an arrangement they would prefer to change. They are active participants whose economic security, political loyalty obligations, and network relationships depend on the continuation of patronage appointments. Reforming the civil service therefore requires not just new legislation but a political settlement that addresses the interests of those who would lose from meritocratic reform.

Several mechanisms reduce this resistance. First, grandfathering: existing officials in post are not removed en masse — the reform applies to new appointments and promotions, not to retrospective dismissal of patronage appointees. This reduces the immediate cost of reform to those currently embedded in the system. Second, alternative economic opportunity: the private sector development and diaspora re-engagement programme in Paper 6 creates alternative economic pathways that reduce the dependence on state employment as the primary route to economic security for political networks. Third, sequencing: beginning meritocratic reform in the highest-visibility, highest-impact institutions — the central bank, the

revenue authority, the IDU, the regulatory bodies — demonstrates the benefits of the approach before extending it more broadly, building the constituency that sustains the reform politically.

2.4b The Legacy Workforce: Re-Certification and Transition

The meritocratic gateway designed for future civil service entrants addresses new appointments effectively. It does not address the existing workforce — which is heavily bloated, structurally entrenched in patronage relationships, and, if left unaddressed, will actively bottleneck the new system from within. Legacy administrators who built careers in the patronage environment have both the institutional knowledge and the incentive to subvert meritocratic reform through the mechanisms described in Section 2.5: procedural obstruction, selective application, parallel track contamination. An immaculate meritocratic gateway will not produce institutional change if the existing workforce retains effective control of how the institution actually operates.

This blueprint therefore introduces a 36-month Legacy Re-Certification Protocol covering all sitting civil servants at Director level and above. The protocol is not a purge — it is a structured, transparent transition process that distinguishes capable officials currently operating in a dysfunctional system from those whose positions depend on the dysfunction continuing:

- Independent skills and integrity audit: all Directors and above subject to an independent competency assessment against the role's technical requirements and an integrity review examining procurement decisions, appointment records, and asset declarations. Conducted by an independent panel with no connection to the official's ministry, with findings reported to the PSC
- Re-certification outcome: officials who meet the competency and integrity threshold are re-confirmed in post and transferred to the meritocratic framework on equivalent terms. Officials who do not meet the threshold are offered a transparent, donor-funded retrenchment and reskilling package — not dismissal without support, but a structured exit that reduces the grievance that can fuel active sabotage
- Transitional timeline and sequencing: the re-certification process begins in the highest-leverage institutions — the IDU, revenue authority, procurement bodies, and regulatory agencies — before extending to line ministries, matching the sequencing logic that prioritises early institutional wins in visible, investor-facing functions
- Due process protections: officials who dispute their assessment outcome have a right of appeal to the PSC's independent review panel, with legal representation permitted. The process must be demonstrably fair to maintain legitimacy with the broader civil service and avoid creating a legal challenge that derails the reform programme

2.5 Administrative Resistance and Reform Sabotage

Civil service reform rarely fails at the legislative stage. It fails at the implementation stage, through mechanisms that are individually mundane but collectively decisive. Officials whose positions derive from patronage, or who have built careers and networks within the patronage system, have rational incentives to resist meritocratic reform — and the institutional knowledge to do so effectively without overtly opposing it. Understanding and preparing for these resistance mechanisms is the difference between a reform that changes the recruitment register and one that changes the recruitment reality.

- Procedural obstruction: finding technical deficiencies in reform legislation or implementation guidelines that justify delay without requiring explicit opposition — the regulation requires a committee that has not yet been constituted, the examination framework requires ministerial approval that is pending, the public appointment register cannot be launched until a data protection framework is in place. Each delay is individually justifiable; collectively they defer reform indefinitely.
- Parallel track contamination: operating a nominally meritocratic recruitment process while ensuring that patronage candidates perform well enough to pass — through advance access to examination questions, generous interpretation of answers, or panel composition that reliably favours connected candidates while maintaining the appearance of competitive selection.
- Selective application: implementing competitive recruitment for visible, low-sensitivity roles while preserving patronage appointments in the high-leverage technical positions where institutional knowledge and relationships matter most — revenue authority, procurement, regulatory bodies.
- Internal coalition formation: reform-resistant officials forming internal networks that coordinate to make meritocratic appointees' work difficult — withholding institutional knowledge, excluding them from informal decision processes, escalating minor procedural errors, and generally creating conditions in which capable new entrants leave or are pushed out.

The responses to these resistance mechanisms must be built into the reform design from the outset. Independent external audit of the PSC's recruitment processes, civil society monitoring of appointment register compliance, whistleblower protection for officials who report process manipulation, and the IDU's statutory mandate to escalate non-compliance publicly — together these create the external pressure that makes internal resistance visible and costly rather than quiet and effective.

SECTION 3

3. Axis B: Judicial Independence and Commercial Court Reform

Zimbabwe's judicial reform challenge has two distinct components that require different interventions. The first is the independence of the broader judiciary from executive influence — a constitutional and political reform. The second is the creation of specialised commercial dispute resolution capacity at international standards — an institutional and technical reform. Both are necessary, but they can be sequenced, and the commercial court reform can proceed faster than broad judicial independence reform if the political conditions for the latter are not immediately available.

3.1 Constitutional Protections for Judicial Independence

Judicial independence in Zimbabwe is formally guaranteed by the Constitution but practically compromised by appointment processes that give the executive significant influence over judicial selection, remuneration structures that leave judges financially dependent on executive goodwill, and a track record of outcomes in politically sensitive cases that has damaged the judiciary's credibility with both domestic and international observers.

The structural reforms required are well established in comparative constitutional law:

- **Judicial Service Commission reform:** the body responsible for judicial appointments must be genuinely independent of executive direction. Its composition should give a majority of votes to members who are not government nominees — including representatives of the Law Society, legal academics, and retired senior judges appointed by judicial, not executive, authority
- **Security of tenure and remuneration:** judges' salaries and pensions must be constitutionally protected from reduction during service, removing the financial pressure that can make judges susceptible to executive influence
- **Transparent appointment process:** all judicial appointments above magistrate level published, with the Judicial Service Commission's assessment of candidates' qualifications, judicial philosophy, and fitness for office. Transparency reduces the political space in which inappropriate appointments can be made without public accountability
- **Term limits for Chief Justice and Supreme Court appointments:** fixed, non-renewable terms ensure that judicial leadership does not become entrenched in relationships with the executive that compromise independence over time

3.2 The Specialised Commercial and Investor Court

The establishment of a specialised commercial and investor court is the single most direct intervention available to reduce Zimbabwe's investment risk premium. The international models are clear and instructive.

The Dubai International Financial Centre Courts, established in 2006, operate under English common law and are structurally independent from the UAE's civil law domestic court system. They feature internationally distinguished judges drawn from leading common law jurisdictions — former UK Court of Appeal judges, senior Australian judiciary members — and apply procedural rules designed for speed, predictability, and commercial sophistication.⁷ Over 60% of their docket involves cross-border transactions. Their judgments are enforceable both domestically and internationally under the New York Convention. They have become a primary reason why international corporations choose Dubai as a base for regional operations — not because of geography alone, but because of legal certainty.

The Singapore International Commercial Court, launched in 2015, operates on a similar model: international judges, flexible choice of governing law, English language proceedings, and a track record of efficient, impartial resolution of complex commercial disputes.⁸ In 2024, the Singapore International Arbitration Centre handled 625 new cases with 91% involving international parties from 72 jurisdictions — a scale achieved because the institutional credibility of Singapore's legal system attracts disputants who could choose any forum in the world.

Zimbabwe does not need to replicate these institutions at their current scale. It needs to apply their core design principles: English common law jurisdiction, expedited and transparent procedural rules, a panel that includes internationally respected commercial judges alongside domestic judiciary, and clear enforcement pathways for judgments. The specific architecture proposed:

- Establishment by Act of Parliament: a dedicated Zimbabwe Commercial and Investor Court Act creating a specialised jurisdiction for all commercial and investment disputes above a defined threshold — recommended at \$5 million to focus resources on the disputes that most affect investor confidence
- International jurist panel: the Court's bench to include both senior Zimbabwean judges and internationally appointed commercial jurists, with the international jurists selected through a transparent merit process by an independent Judicial Appointments Panel, not by the executive
- Expedited timelines: mandatory case management timelines requiring first hearing within 30 days of filing, interlocutory applications decided within 14 days, and final judgment within 12 months of commencement for all but the most complex cases

- Published judgments: all judgments published online and freely accessible, creating the body of precedent that commercial parties need to predict outcomes and draft contracts accordingly
- International arbitration gateway: the Court to maintain formal referral relationships with the Permanent Court of Arbitration, the London Court of International Arbitration, and the Singapore International Arbitration Centre, enabling parties to move seamlessly between litigation and arbitration within a coherent dispute resolution framework
- New York Convention accession: Zimbabwe's accession to the New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards, ensuring that both Court judgments and arbitration awards are enforceable in the 170+ signatory states, dramatically expanding the practical enforceability of dispute resolution outcomes

Dual-Track Justice Risk: Addressing the Legitimacy Question

A specialised commercial court designed to attract international investors will inevitably face a domestic legitimacy challenge: the perception that foreign corporations and wealthy investors receive faster, better-quality justice than ordinary Zimbabwean citizens navigating the general court system. This perception, if not addressed directly, risks delegitimising the commercial court in the eyes of the broader public — precisely the constituency whose support the governance reform programme needs to sustain itself politically.

This blueprint addresses the dual-track risk in two ways. First, the commercial court reform is explicitly framed as Phase One of a broader judicial modernisation programme, not as a permanent parallel system. The procedural innovations, case management timelines, and transparency standards developed in the commercial court are explicitly designed to be rolled out progressively to the general judiciary as institutional capacity develops. The commercial court is a pilot and a model, not a privilege. Second, the commercial court's threshold — disputes above \$5 million — means its direct beneficiaries are primarily large commercial actors. The general judiciary improvements proposed in Section 3.1 — Judicial Service Commission reform, security of tenure, transparent appointments — directly benefit ordinary citizens. Both tracks advance simultaneously; neither is sacrificed for the other.

Constitutional Separation: Protecting the Court from Appellate Override

A critical legal vulnerability in the commercial court design must be addressed at the constitutional level. The DIFC and Singapore International Commercial Court operate under constitutional or statutory frameworks that establish their jurisdictions outside the standard domestic appellate hierarchy for defined commercial matters. Without equivalent protection in Zimbabwe, any high-value ruling by the Specialised Commercial and Investor Court — particularly in politically sensitive cases involving land tenure, mining concessions, or state

contracts — risks being appealed to and overturned by the Supreme Court or Constitutional Court on national sovereignty grounds. A single high-profile appellate reversal would destroy the investor confidence the court is designed to produce, and would signal that the commercial court enclave is ultimately subordinate to the same domestic judicial environment it was created to supplement.

This blueprint therefore requires a formal Constitutional Carve-Out Amendment establishing the Specialised Commercial and Investor Court as an autonomous judicial enclave for defined commercial disputes. The amendment specifies that Court judgments in matters above the jurisdictional threshold are legally final and binding on all state organs, subject to no further domestic appellate review on the merits, and directly enforceable under the New York Convention. Appeals on grounds of procedural violation or constitutional rights infringement remain available through a dedicated Commercial Court Review Panel rather than through the general appellate hierarchy, preserving due process without creating the appellate pathway through which politically motivated challenge would flow. The constitutional amendment requires parliamentary supermajority — the same threshold as the ZACC prosecutorial independence amendment — and both are best pursued as part of a single constitutional reform package that makes the governance architecture politically coherent and reduces the number of high-threshold legislative battles required.

Judicial Integrity: Safeguarding the Court Itself

A commercial court whose judges are susceptible to corruption, case-fixing, or political pressure defeats its own purpose more catastrophically than no specialised court at all — because the reputational damage of a captured specialised court is greater than ordinary judicial delay. The institutional integrity of the Specialised Commercial and Investor Court must therefore be protected by its own internal architecture, not assumed from the institutional environment around it.

- Randomised case allocation: cases assigned to judges through a software-managed randomisation system with no discretionary human allocation at any stage. The randomisation log is auditable by the judicial ethics oversight body. This breaks the relationship networks through which case outcomes can be influenced by directing sensitive matters to sympathetic judges
- Judicial financial disclosure: all judges of the Commercial and Investor Court subject to the same asset disclosure regime as senior public officials under Section 4.4 — publicly accessible, annually updated, and cross-referenced against the DPI asset tracking system. A judge whose asset profile diverges from their judicial salary during their tenure triggers automatic ZACC review
- Digital case tracking: all case filings, hearing dates, interlocutory decisions, and judgments recorded in a publicly accessible digital case management system in real

time. Parties, their lawyers, and the public can track case progress without requiring human intermediation — eliminating the administrative opacity through which delay and manipulation can be quietly engineered

- Independent Judicial Ethics Committee: a standing committee with external members from the Law Society, civil society, and retired international jurists, empowered to receive complaints about judicial conduct, initiate investigations, and recommend suspension or removal to the Judicial Service Commission. Committee findings published publicly
- Judgment publication requirement: all Commercial and Investor Court judgments published online within 30 days of delivery, in full and unredacted except for legitimately confidential commercial information agreed by the parties. Published judgments create the body of precedent that commercial parties need, and make aberrant or inconsistent reasoning publicly visible and subject to legal academic and practitioner scrutiny

3.3 Property Rights Reform: The Foundation of Agricultural and Investment Potential

No commercial court can protect property rights that are not clearly defined in law. Zimbabwe's property rights framework — particularly for land — remains the unresolved legacy of the fast-track land reform programme and the most significant single deterrent to both domestic agricultural investment and international investor confidence.

Before addressing property rights reform, intellectual honesty requires acknowledging the colonial context from which Zimbabwe's land question emerges. The dispossession of land from African communities under colonial rule was a fundamental injustice whose effects on wealth distribution, agricultural opportunity, and economic participation persisted for nearly a century. The land redistribution programme of the early 2000s, however damaging in its implementation, was driven by legitimate grievances about deeply unequal land ownership that the colonial period had produced and the post-independence period had not adequately addressed. This blueprint does not dispute the legitimacy of redistribution as a policy objective. It distinguishes between redistribution — which was and remains a legitimate aim — and permanent tenure insecurity, which was an unintended consequence of the redistribution process and which is economically destructive regardless of its historical origins. The goal of property rights reform is to complete what land redistribution began: ensuring that those who now hold land can invest in it, borrow against it, and pass it on with the security that makes productive long-term agricultural investment rational.

The blueprint does not propose reversing land reform. It proposes securing the rights of current occupants through a framework that provides legal clarity, security of tenure, and the ability to use land as collateral for productive investment. The specific requirements:

- Land tenure legislation: a comprehensive Land Tenure Act that defines and legally secures the rights of all current land occupants — whether under leasehold, offer letter, or other arrangement — to the extent of providing bankable security of tenure that financial institutions will accept as loan collateral
- Digital land registry: a publicly searchable land registry in which all land holdings are recorded, with clear chain of title and encumbrance information, accessible digitally by financial institutions, investors, and landowners. This connects directly to the DPI infrastructure proposed in Paper 3
- Bifurcated Agrarian Dispute Resolution: Zimbabwe establishes two parallel dispute resolution streams to serve both smallholder and commercial agricultural interests without overloading the Commercial and Investor Court. A low-cost Specialised Land Rights Tribunal handles smallholder tenure securitisation, leasehold boundary disputes, inheritance resolution, and title formalisation — operating with simplified procedure, accessible filing requirements, and no minimum claim threshold. The Specialised Commercial and Investor Court restricts its agrarian jurisdiction to high-value corporate agribusiness disputes, international joint-venture PPP breaches, and agricultural processing plant capital litigations above \$2 million — ensuring speed and expertise are directed at disputes that most affect large-scale agricultural investment while the Tribunal serves the millions of smallholder occupants whose tenure security is the foundation of rural productivity.
- Mineral rights clarity: a parallel minerals rights registry providing investors in Zimbabwe's mineral resources with the same legal certainty about extraction rights that land tenure legislation provides agricultural investors

Anti-Speculation and Land Concentration Safeguards

Secure, bankable, and tradable land tenure is the foundation of agricultural investment. But tradability carries a long-run risk that must be explicitly addressed: if land can be freely bought and sold, it can also be accumulated. Over time, market mechanisms operating without safeguards could produce a reconsolidation of land ownership in the hands of a new elite class — repeating in a different institutional form the concentrated ownership that redistribution was designed to correct. The political delegitimisation of tenure reform that followed historic concentration took generations to resolve. Zimbabwe cannot afford to build that dynamic into a reformed tenure system.

- Ownership concentration reporting: all land transfers above a defined hectare threshold reported to a Land Registry Monitoring Unit, which publishes annual data on land ownership concentration by province and land use category. Transparency enables civil society and parliament to identify reconsolidation trends before they become politically entrenched

- Foreign ownership restrictions: foreign nationals and foreign-owned corporate entities restricted from holding freehold title to agricultural land above a defined threshold, with leasehold arrangements available for legitimate agribusiness investment. This preserves the principle that Zimbabwe's agricultural land is held by Zimbabweans while enabling productive commercial farming investment
- Anti-speculation holding periods: land acquired through the tenure formalisation programme subject to a minimum holding period before resale, preventing rapid speculative purchase and resale that extracts value from formalisation without productive agricultural investment
- Community pre-emption rights: where agricultural land in a defined community zone is offered for sale, the local community council has a statutory right of first refusal at the offered price, enabling communities to prevent consolidation by external purchasers while respecting the owner's right to sell

SECTION 4

4. Axis C: The Accountability Engine — Genuine Anti-Corruption Enforcement

The accountability architecture proposed in this paper is built on a single insight from Zimbabwe's experience and the comparative evidence from across Africa: anti-corruption bodies fail systematically not when they lack investigative powers but when they retain investigative powers while depending on a politically controlled prosecution authority to convert investigations into consequences. Investigation without prosecution is not anti-corruption enforcement. It is performance.

4.1 The Structural Failure of ZACC's Current Architecture

Zimbabwe's ZACC is constitutionally mandated, independently constituted, and operationally active. It has broad investigative powers, the authority to direct the Commissioner-General of Police to investigate cases, and the power to refer matters to the National Prosecuting Authority for prosecution. What it cannot do — by constitutional and statutory design — is prosecute.¹

This is not a minor technical gap. It is the fundamental structural deficiency that renders ZACC's anti-corruption mandate largely unenforceable against powerful interests. When ZACC builds a case against a senior official and refers it to the NPA, the NPA has full prosecutorial discretion: it can proceed, decline, or delay without being required to provide reasons to ZACC or to the public. In a political environment in which the NPA is perceived as subject to executive influence, this discretion operates as a political veto over anti-corruption prosecution. The result is the catch-and-release cycle that has characterised high-profile corruption cases in Zimbabwe: investigation, arrest, referral, quiet discontinuation, and the implicit lesson to future officials that the anti-corruption architecture is not a genuine deterrent.

The evidence from comparable reform contexts confirms that this structural flaw is the norm, not the exception, in African anti-corruption frameworks. The PPLAAF assessment of ZACC describes it as 'perceived by many civil society organisations as inept, understaffed and under-resourced, and without any real authority.' The academic literature on anti-corruption enforcement in Africa consistently identifies prosecutorial dependence on politically controlled authorities as the primary mechanism by which anti-corruption bodies are neutered despite formal independence mandates.[¶]

4.2 Constitutional Amendment: Direct Prosecutorial Authority for ZACC

This blueprint proposes a constitutional amendment granting ZACC direct, independent prosecutorial authority for all offences falling within its mandate — corruption, misappropriation, abuse of office, and related economic crime in both public and private sectors. The amendment bypasses the NPA entirely on matters within ZACC's jurisdiction, enabling ZACC to file indictments directly to an Anti-Corruption Court without requiring NPA approval.

The constitutional amendment requires parliamentary supermajority — which is a high political threshold and acknowledges the reform's political difficulty honestly. But it is the only reform that addresses the structural deficiency rather than working around it. Arrangements that attempt to achieve prosecutorial independence through MOU or administrative agreement between ZACC and the NPA have consistently failed elsewhere in Africa because they do not change the underlying power relationship. Only constitutional change creates the institutional separation that is genuinely durable.

Several comparable jurisdictions provide useful precedent. Kenya's Ethics and Anti-Corruption Commission, following constitutional reform in 2010, has greater operational independence than its predecessor. Rwanda's Ombudsman operates with prosecution referral powers that are binding rather than advisory. The Serious Fraud Office model in the United Kingdom — which combines investigation and prosecution within a single institution — demonstrates that the combination is operationally coherent and legally defensible. None of these is a perfect model, but each demonstrates that prosecutorial independence from a general prosecution authority is achievable and functional.

4.2b Internal Structural Firewall: Separating Investigation from Prosecution

Granting ZACC direct prosecutorial authority solves the catch-and-release cycle but creates a distinct institutional risk that must be addressed in the design: when the same organisation investigates and prosecutes, confirmation bias becomes structurally embedded. Investigators who build a case against a target develop an institutional and professional stake in the prosecution succeeding. Prosecutors drawn from the same team lack the independent judgement to assess whether the evidence actually meets the prosecutorial threshold. The UK Serious Fraud Office — which combines investigation and prosecution — has faced repeated legal friction on precisely this basis, with defendants successfully challenging processes that conflated the investigative and prosecutorial functions.

This blueprint therefore requires a strict internal structural firewall between ZACC's investigative and prosecutorial wings. The two divisions operate under completely separate reporting lines: the Director of Investigations reports to the ZACC Commission; the Director of

Prosecutions reports to the Judicial Service Commission, not to ZACC's executive leadership. Personnel may not transfer between divisions on the same case. When the investigative division completes a file and refers it for prosecutorial consideration, the prosecutorial division conducts an independent assessment of evidential sufficiency — applying the same standard that would govern any prosecutorial decision — without presumption in favour of prosecution simply because the investigative division has concluded a case exists.

This firewall design addresses the due process criticism while preserving the essential reform: ZACC's prosecutorial wing remains independent of the NPA's political discretion, but is not simply an extension of the investigative function with a different label. The Anti-Corruption Court, by receiving cases from the prosecutorial division rather than directly from investigators, provides an additional objective judicial friction layer that further insulates the overall process from the confirmation bias that a fully unified investigate-and-prosecute model would produce.

4.3 The Specialised Anti-Corruption Court

Prosecutorial independence is necessary but not sufficient. ZACC's enhanced prosecutorial authority must be matched with a court system capable of hearing corruption cases with the speed, expertise, and independence that the cases require.

A dedicated Anti-Corruption Court — established by statute as a division of the High Court with specialised jurisdiction over all ZACC-initiated prosecutions — provides the institutional home for this jurisdiction. The Court's specific design features:

- **Dedicated judiciary:** judges assigned to the Anti-Corruption Court by the reformed Judicial Service Commission through a transparent merit process, with preference for candidates with financial crime, commercial fraud, and asset recovery expertise
- **Expedited procedure:** mandatory case management timelines with pre-trial disclosure obligations that reduce the delay tactics that have historically allowed high-profile defendants to postpone trial indefinitely
- **Asset freezing and confiscation jurisdiction:** the Court to have full jurisdiction over asset recovery orders, enabling ZACC to pursue the proceeds of corruption through civil and criminal confiscation processes within a single institutional framework
- **Public proceedings and published judgments:** all Anti-Corruption Court proceedings open to the public and media unless specific grounds for in camera hearing are established, with all judgments published online and freely accessible. Transparency is the social deterrent that complements legal deterrence

Managing Prosecutorial Overload: Strategic Triage

A credible ZACC with genuine prosecutorial authority will rapidly face a challenge that its current toothless version does not: an overwhelming volume of referrals, complaints, and self-initiated investigations that exceeds institutional capacity to prosecute. Without deliberate triage, ZACC will either become a backlog institution — creating the perception of dysfunction that undermines deterrence — or will dissipate prosecutorial effort on minor cases while major corruption cases age in the queue. Both outcomes restore the impunity that structural reform is designed to eliminate.

- Strategic prosecution prioritisation: ZACC's Director of Prosecutions publishes and applies a written triage framework specifying the criteria that determine prosecution priority. Cases involving the largest amounts, the most senior officials, the most systemic patterns of corruption, and the clearest public deterrence value are prioritised over individual minor cases — even when the minor cases are easier to prosecute. The framework is public, enabling external assessment of whether ZACC is applying it consistently
- Deferred prosecution agreements: for lower-level officials and private sector actors who cooperate with ZACC investigations, provide evidence against more senior targets, and make full restitution, deferred prosecution agreements provide an alternative to full trial that conserves prosecutorial resources for the highest-priority cases while still imposing consequences and generating intelligence. DPA terms are published, ensuring transparency about what cooperation produces
- Caseload capacity monitoring: ZACC's annual parliamentary report includes a caseload capacity assessment — number of active investigations, prosecutions in progress, average case duration, and backlog metrics — enabling parliament and civil society to assess whether ZACC's resource base is adequate for its mandate and to apply pressure for staffing increases when capacity constraints are visible and documented
- Civil recovery as complement: ZACC pursues civil asset recovery — through the Unexplained Wealth Order mechanism and civil confiscation proceedings — as a parallel track to criminal prosecution in cases where the criminal standard of proof is difficult to meet but asset recovery is clearly justified. Civil recovery requires fewer resources than full criminal prosecution and achieves the restitution objective even where prosecution does not proceed

4.4 The Public Asset Disclosure Register

A mandatory, publicly accessible, electronically searchable register of assets held by all senior public officials is simultaneously a corruption deterrent, an investigation tool, and a public accountability mechanism. The constitutional and statutory framework:

- **Mandatory disclosure:** all elected officials, line ministers, Permanent Secretaries, parastatal board members, senior security officials, and members of independent regulatory commissions to file annual, verified asset declarations covering all assets held personally or through family members, nominees, or corporate vehicles
- **Public accessibility:** the register searchable online by any citizen, with declared assets publicly visible. The public nature of the register is the mechanism — it enables civil society, journalists, and political opponents to identify unexplained wealth accumulation and bring it to ZACC's attention
- **Auditor-General verification:** the Auditor-General's office to conduct random and risk-based verification audits of declared assets against tax records, land registry data, company registrations, and bank reports, identifying declarations that appear inconsistent with known income sources
- **Ultimate Beneficial Ownership disclosure:** the declaration framework explicitly covers Ultimate Beneficial Ownership interests — proxy corporate holdings, nominee shareholdings, and discretionary beneficiary rights in domestic or foreign trust structures where the official is a beneficiary but not a legal owner. Sophisticated corrupt actors routinely use offshore shell companies, blind trusts, and family foundations to mask illicit wealth accumulation while maintaining apparent compliance with disclosure requirements that only cover direct legal ownership. The UBO requirement closes this loophole by following economic benefit rather than legal title.
- **Unexplained Wealth Orders:** where a public official's visible asset profile or lifestyle demonstrably diverges from their verified legitimate income sources, ZACC is empowered to issue an Unexplained Wealth Order legally freezing the assets and shifting the burden of proof to the official to document the lawful source of capital. The UWO does not require ZACC to prove the assets are proceeds of crime — it requires the official to prove they are not. This reversal of the evidential burden is proportionate given the public trust dimension of official positions and directly addresses the practical difficulty of tracing corrupt proceeds through complex offshore structures.
- **Non-disclosure as automatic trigger:** failure to file, or filing that is found to contain material misrepresentation, constituting an immediate statutory trigger for suspension from public office pending investigation, with asset forfeiture proceedings commenced automatically rather than at prosecutorial discretion

Privacy and Personal Security Considerations

A fully public asset disclosure register creates a genuine privacy and personal security concern that must be addressed directly. Publicly disclosing the residential properties, vehicles, and financial assets of senior officials creates information that could be exploited by criminal actors — kidnapping risk for officials and their families, targeted theft, and the potential

for disclosed information to be used for harassment or blackmail. These risks are real in Zimbabwe's security context and must not be dismissed as pretexts for non-disclosure.

The response is proportionate rather than prohibitive. Home addresses and precise locations of residential property are redacted from the public-facing register while remaining accessible to ZACC and the Auditor-General for verification purposes. Motor vehicle registration numbers are similarly redacted. The public register shows asset categories and approximate values — sufficient for transparency purposes — while full details are held in a secured verification database accessible only to authorised oversight bodies. Senior officials with specific credible security concerns may apply to the Auditor-General for additional redaction, subject to independent review. These proportionate protections maintain the transparency purpose of the register — enabling civil society and journalism to identify unexplained wealth accumulation — while acknowledging that disclosure designed to deter corruption should not inadvertently create physical safety risks.

DPI-Automated Asset Cross-Referencing

Manual audit of asset declarations — even with strong legal frameworks — is slow, resource-intensive, and vulnerable at the verification stage. A sufficiently motivated corrupt official can delay, obscure, or influence a human audit process in ways that algorithmic verification cannot be manipulated. This blueprint therefore mandates a hard technical integration between the asset disclosure framework and the National DPI Stack's secure data exchange layer — removing human discretion from the initial detection loop entirely.

The registry system operates as an automated software layer running directly on the DPI Stack's secure data exchange. It algorithmically cross-references the bank transaction records, deeds office property registrations, tax filings, company shareholding records, and vehicle registration data of all registered public officials in real time against their declared asset profiles and verified salary bands. Any asset acquisition, property transfer, or transaction pattern that deviates materially from the official's audited income profile triggers an automatic, programmatic flag routed directly to ZACC's investigative unit for human review. The system does not make prosecution decisions — that remains a human function with the safeguards described in Section 4.2b and 4.6 — but it eliminates the detection gap through which unexplained wealth currently passes undetected until a complaint is filed or a journalist investigates.

The integration requires that the DPI Stack's data exchange layer — proposed in Paper 3 — be operational before the automated tracking system can function at full capability. This is a further reason why the Paper 3 and Paper 4 reform programmes are sequenced dependencies rather than parallel tracks: digital infrastructure enables governance enforcement at a standard that paper-based systems cannot achieve.

4.5 Political Economy of Accountability Reform

Accountability reform is, like civil service reform, a direct threat to existing power structures. Officials who benefit from impunity will resist the creation of genuine enforcement mechanisms. This resistance will be expressed through constitutional amendment delays, budget constraints on ZACC, legislative drafting that preserves procedural loopholes, and the appointment of commissioners who appear independent but prove otherwise in practice.

The political economy levers that support accountability reform are the same ones identified in the broader political economy analysis of Paper 1: international institutional anchoring, civil society pressure, diaspora scrutiny, and the reform coalition within government. IMF and World Bank programme conditionality increasingly includes governance benchmarks that create external pressure for accountability reform. Bilateral donors and DFI partners make governance indicators an explicit condition of engagement. Civil society organisations that document governance failures and maintain public pressure play a monitoring role that formal institutions cannot fully provide. And the diaspora — whose return is conditional on institutional trust — represents a constituency whose interest in genuine accountability reform is direct, vocal, and politically consequential.

The argument for accountability reform that reaches political actors who benefit from the current system is not a moral one. It is a rational one: the institutional environment that accountability reform creates is the one in which Zimbabwe attracts the investment, builds the infrastructure, and generates the growth that makes the overall development programme sustainable. Impunity is not free. Its cost is the investment that does not come, the talent that does not return, and the international partnerships that do not materialise because institutional trust is absent.

4.6 Safeguards Against Politicised Prosecution

A ZACC with direct prosecutorial authority is a powerful institutional instrument — and power requires institutional safeguards against its misuse. The same independence that protects ZACC from executive interference in pursuing the powerful could, without adequate safeguards, enable ZACC to be used as a political weapon against opponents of whoever controls its leadership. This risk is not hypothetical: across Africa, anti-corruption institutions with genuine powers have at various points been used selectively to prosecute political opponents while protecting allies. The architecture of ZACC's independence must therefore include safeguards against politicised prosecution as explicitly as it includes safeguards against executive interference.

- Published prosecutorial standards: the Director of Prosecutions publishes a written prosecutorial policy establishing the evidential and public interest tests applied in all prosecution decisions. Every decision not to prosecute a referred case is documented with reference to these standards. The policy is publicly available and reviewed annually by a parliamentary committee.
- Annual parliamentary reporting: ZACC submits an annual report to parliament detailing all investigations commenced, cases referred for prosecution, prosecutorial decisions made, and case outcomes — disaggregated by sector, seniority of officials involved, and political affiliation where determinable. Statistical patterns that suggest selective enforcement become publicly visible and subject to parliamentary scrutiny.
- Judicial oversight of prosecution decisions: defendants have the right to challenge prosecutorial decisions on the grounds of selective enforcement, abuse of process, or violation of the published prosecutorial standards, before a pre-trial hearing in the Anti-Corruption Court. This judicial friction layer creates institutional accountability for prosecutorial decisions without restoring the NPA's political veto.
- Appeals mechanism: all Anti-Corruption Court convictions appealable to a dedicated Appeals Division of the Supreme Court with specifically designated judges, ensuring that ZACC's prosecutorial authority does not create a conviction pipeline without adequate judicial review.
- Prosecutorial independence from ZACC commission: the Director of Prosecutions, while housed within ZACC, is appointed by and accountable to the Judicial Service Commission rather than to ZACC's political commissioners — ensuring that prosecutorial decisions cannot be directed by the same political pressures that might compromise the commission's independence.

SECTION 5

5. Regulatory Reform: Reducing the Cost of Doing Business

Governance reform is not only about stopping bad things — corruption, patronage, impunity. It is also about enabling good things: investment, entrepreneurship, formal employment, economic participation. Zimbabwe's regulatory environment currently imposes costs on legitimate economic activity that are among the highest in the region, deterring the formal sector development that is essential to expanding the tax base, creating employment, and achieving the development trajectory this blueprint describes.

5.1 The Regulatory Burden Diagnosis

Zimbabwe ranks poorly on the dimensions of business regulation that matter most to investors and entrepreneurs: the time and cost to register a business, obtain licences, comply with tax and reporting requirements, and resolve commercial disputes. These costs are not distributed equally. They fall disproportionately on small and medium enterprises and on informal sector operators considering formalisation — precisely the businesses whose entry into the formal economy is most important for tax base expansion and employment creation. When formalisation costs more than the benefit it provides, rational economic actors remain informal. Regulatory reform that reduces these costs is therefore directly connected to the fiscal strategy of Paper 2 and the formalisation agenda of Paper 3's DPI stack.

5.2 Regulatory Impact Assessment Framework

All new regulations above a defined significance threshold to be subject to a mandatory Regulatory Impact Assessment before enactment, evaluating: the problem the regulation addresses, the alternatives considered, the compliance costs on different categories of business, and the enforcement requirements and costs to government. The RIA must be published and open to public consultation before the regulation is finalised.

This is not a device to prevent necessary regulation. It is a discipline that ensures the costs of regulation are weighed against the benefits, and that regulations that impose significant costs without commensurate public benefit can be identified and either redesigned or rejected. A standing Regulatory Reform Committee — chaired by the IDU and including representatives of the private sector and civil society — reviews RIA outputs and publishes annual reports on the regulatory burden trends, creating public accountability for the accumulation of regulatory costs over time.

5.3 Legacy Regulation Review and the ‘One-In, One-Out’ Rule

Zimbabwe has accumulated decades of legacy regulations, many of which are redundant, contradictory, or impose costs on legitimate economic activity that far exceed any plausible public benefit. A systematic review of the stock of existing regulations — conducted by the Regulatory Reform Committee with sector expertise and private sector input — will identify regulations for repeal, simplification, or consolidation.

Simultaneously, a ‘one-in, one-out’ rule — requiring that any new regulation imposing compliance costs be accompanied by the repeal or simplification of an existing regulation of equivalent cost burden — prevents the regulatory burden from re-accumulating through incremental additions that individually appear modest but cumulatively become prohibitive. This rule is not absolute — emergency regulations and those required by international treaty obligations are exempted — but it applies as the default to all domestic regulatory proposals.

5.4 Single Business Registration Portal

Business registration in Zimbabwe currently requires interaction with multiple agencies — the Companies Registry, ZIMRA, local authorities, sector-specific licencing bodies — across separate physical locations with separate forms, fees, and processing timelines. The aggregate time and cost of this process is a direct deterrent to formalisation.

A single digital business registration portal — integrated with the DPI infrastructure proposed in Paper 3 — enables a business to complete all registration, licencing, and tax registration requirements through a single online interaction. The target: a registered, tax-compliant business operating legally in Zimbabwe within five working days of application submission. This is achievable — Rwanda’s reforms have produced business registration within 24 hours — and it would represent a transformative shift in the cost of formal economic participation for small and medium enterprises.

5.5 From Discretion to Rules: Eliminating Regulatory Arbitrage

Regulatory reform in Zimbabwe faces a dimension that the RIA framework and one-in-one-out rule address only partially: the gap between what regulations say and how they are enforced. Discretion-based licensing and inspection regimes create structural opportunities for rent-seeking that persist even when the underlying regulation is well-designed. An inspector with discretionary power to certify or reject compliance, with no obligation to document their decision or justify it by reference to specific standards, possesses an economic asset that corrupt actors will exploit regardless of the formal regulatory framework.

- Checklist-based compliance: all inspections and licencing decisions to be conducted against published, specific, objectively verifiable checklists rather than general standards that leave significant discretionary space. The checklist is provided to the applicant or inspected entity in advance. The inspector's decision is documented point-by-point against the checklist, creating a reviewable record of the decision rather than a discretionary judgement that cannot be meaningfully challenged.
- Appeals mechanism for adverse regulatory decisions: every rejected licence application or adverse inspection outcome is appealable to an independent regulatory appeals panel within 30 days, with the panel required to assess the decision against the published checklist and provide a written determination. The existence of the appeals mechanism reduces the value of discretionary adverse decisions as rent-seeking leverage.
- Randomised inspection allocation: inspectors assigned to businesses through a randomised, software-managed system rather than through discretionary allocation by supervisors. Randomisation breaks the relationship networks that allow established corrupt arrangements between inspectors and regulated entities to persist indefinitely.
- Anonymous regulatory reporting: a secure, anonymous digital reporting channel enabling businesses and individuals to report rent-seeking by inspectors and licencing officials without fear of retaliatory adverse regulatory action. Reports analysed for patterns that identify systemic rather than individual misconduct.

SECTION 6

6. The Political Economy of Governance Reform: Why This Time Can Be Different

Every governance reform proposed in this paper has been proposed before, in Zimbabwe or comparable contexts, and has failed to deliver durable change. Civil service reform initiatives have produced new frameworks that were quietly populated with patronage appointees. Anti-corruption campaigns have produced arrests and prosecutions that were eventually dropped or converted to light sentences. Commercial court reforms have produced new procedures that were not meaningfully followed. The sceptical reader is entitled to ask: what is different now?

The answer has four parts, and none of them is sufficient alone. Together they constitute a more favourable political economy for durable governance reform than Zimbabwe has previously experienced.

6.1 The Cost of Impunity Has Never Been Higher

Zimbabwe's sovereign debt distress, its exclusion from multilateral financing, its talent haemorrhage, and its inability to attract private investment at the scale its development trajectory requires are all, in significant part, governance failures. The macroeconomic cost of the governance deficit is now large enough, and visible enough, that the domestic constituency for reform — in business, in civil society, in the diaspora, and among reform-minded actors within government — is broader and more vocal than at any previous point.

6.2 International Conditionality Creates External Anchors

The IMF, World Bank, and African Development Bank have made governance reform an increasingly explicit condition of engagement — not as a political preference but as an operational requirement, because their experience demonstrates that technical and financial assistance deployed into governance environments without accountability produces results that do not justify the investment. For Zimbabwe, the arrears clearance roadmap established in Paper 2 creates a specific, time-bound negotiation with multilateral creditors in which governance benchmarks will be explicit. The conditionality is not comfortable, but it is useful: it creates external accountability for governance reform that supplements the domestic political pressure that reform coalitions alone cannot always sustain.

6.3 The Diaspora as Governance Constituency

Zimbabwe's diaspora — several hundred thousand educated, internationally experienced professionals in the UK, South Africa, United States, and Australia — has a direct and personal stake in governance reform that is distinct from general good citizenship. They are the people who would return if property rights were secure, if the institutional environment were trustworthy, and if the anti-corruption architecture made rule of law predictable. Their remittances, their potential investment, and their professional skills make them an economic force that governments have rational incentive to attract. Governance reform is the mechanism by which they are attracted. This creates a constituency for governance reform that is both economically significant and politically observable.

6.4 Sequencing That Shows Results

The governance reforms proposed in this paper are sequenced to deliver visible results early — before the long-horizon institutional changes mature. Commercial court establishment is achievable within two to three years and immediately visible to investors. Asset disclosure register publication is achievable within one to two years and immediately visible to citizens. The first meritocratic appointments in key technical ministries are achievable within one year and immediately visible to international partners. These early wins build the public and political support that sustains the harder reforms — ZACC constitutional amendment, civil service reform extension, property rights legislation — that require longer timelines and higher political thresholds.

6.5 How Reforms Become Durable

The most important governance question is not how reforms are launched but how they survive. Zimbabwe's institutional history contains multiple examples of reforms that were genuine at inception and subsequently reversed, captured, or hollowed out as political conditions changed. The reforms proposed in this paper must be designed not only to function when political will is aligned but to resist reversal when it is not. Durability is an architectural property, not an assumption.

- Constitutional entrenchment: the most critical institutional protections — PSC independence, ZACC prosecutorial authority, judicial security of tenure, central bank independence from Paper 2 — are embedded in the Constitution rather than in ordinary legislation, requiring parliamentary supermajority for amendment. This raises the political cost of reversal above what a simple change of government can achieve unilaterally.
- Transparency norms and digital audit trails: institutions that operate transparently — publishing appointment decisions, prosecution rationales, regulatory decisions, and expenditure records in real time on open digital platforms — are harder to corrupt quietly. Reversal of transparent institutions requires visible action that is observable and documentable by civil society, opposition, diaspora, and international partners.

The digital audit trail created by the DPI infrastructure of Paper 3 is therefore simultaneously a governance accountability mechanism.

- Institutional redundancy: overlapping accountability mechanisms — where the Auditor-General, parliamentary committees, the IDU, ZACC, and civil society organisations each independently monitor different dimensions of institutional performance — mean that capture of one oversight body does not eliminate oversight. Redundancy is the resilience architecture of governance institutions.
- International integration: institutions embedded in international frameworks — the New York Convention, IMF programme conditionality, AfDB governance benchmarks, the UNCAC reporting framework — have external stakeholders whose pressure supplements domestic accountability. Withdrawing from these frameworks to reverse a reform is a visible, costly act that signals governance deterioration to exactly the international partners whose engagement Zimbabwe needs.
- Economic constituencies for clean governance: as the reform programme matures, it creates economic actors who benefit directly from the institutional environment it produces. Private sector investors who have committed capital on the basis of commercial court enforceability, diaspora professionals who have returned on the basis of meritocratic civil service opportunity, and international partners who have deployed concessional financing on the basis of governance benchmarks all have economic stakes in maintaining the institutional environment that attracted them. These constituencies become active defenders of the reform architecture rather than passive recipients of it.

6.6 The Security Sector: The Unavoidable Political Reality

This blueprint has addressed governance primarily through institutional design: civil service reform, judicial independence, anti-corruption enforcement, regulatory improvement. These institutional mechanisms are necessary. But there is a dimension of Zimbabwe's political economy that no amount of institutional design fully addresses without direct engagement: the role of military and security establishment actors in the commercial economy, and the relationship between security sector interests and the governance reforms this paper proposes.

Zimbabwe's security establishment has, over decades, developed significant commercial interests — in mining, agriculture, logistics, and services — that operate in ways that are neither transparent nor subject to the competitive and governance standards the blueprint seeks to establish. These commercial interests create a specific political economy risk: aggressive anti-corruption prosecution and public asset disclosure without an accompanying structured transition pathway for security sector commercial actors creates an existential threat perception that dramatically escalates the risk of institutional sabotage. This is not a

justification for impunity. It is a political economy reality that must be engaged strategically rather than ignored.

This blueprint proposes that the transition be framed as a structured professional buyout rather than a punitive purge. The mechanism:

- Commercial audit and transparency: all corporate entities under military or security establishment ownership subject to an independent commercial audit within the first three years of the reform programme. Audit findings published. This is not a confiscation — it is a transparency requirement that establishes the baseline from which transition proceeds
- Phased unbundling into transparent structures: over a defined 10-year commercial de-escalation period, security establishment commercial entities are systematically unbundled and transitioned into transparent sovereign wealth or public investment structures operating under commercial governance standards, with security establishment actors compensated at market value for their interests
- Competitive professional compensation as the exit incentive: concurrent with commercial de-escalation, military and security service compensation is restructured to provide elite-tier professional salaries, modern equipment, and premium retirement benefits for institutional service. The economic case for private commercial activity weakens when institutional service is itself economically competitive
- Constitutional institutionalism as the long-term goal: the ultimate destination is a professional security sector whose institutional identity, economic security, and professional pride are bound up with constitutional service rather than commercial interest. This transition takes a generation — it is a Phase Three objective, not a Phase One deliverable — but the 10-year commercial de-escalation programme is the mechanism through which it begins

The security sector dimension of governance reform is the frontier question that Paper 4 acknowledges but cannot fully resolve. Durable governance transformation ultimately requires security sector alignment with constitutional institutionalism — and that alignment requires a political settlement that goes beyond institutional design into elite bargaining, transition management, and the long-horizon work of building a professional military culture. These questions are flagged here as the cross-series challenge that the blueprint will need to address in a future paper on transitional political architecture.

SECTION 7

7. Phase One Governance Milestones (Years 1–5)

Consistent with the sequencing logic of the broader blueprint, Paper 4 establishes concrete, measurable Phase One milestones against which governance reform progress can be independently assessed. These are the non-negotiable first-term deliverables that establish the institutional credibility on which everything else depends.

Reform Area	Milestone	Timeline	Key Dependency
Civil Service Reform	Independent Public Service Commission established by Act of Parliament; competitive examination framework deployed across Finance, Energy, Transport ministries; technical specialists pay framework gazetted	Years 1–2	Parliamentary approval; DFI technical assistance
Commercial Courts	Specialized Commercial and Investor Court established with dedicated procedural rules; first panel of international commercial jurists formally gazetted; case management system operational	Years 1–3	Judicial Service Commission reform; international jurist recruitment
ZACC Prosecutorial Reform	Constitutional amendment granting ZACC direct prosecutorial authority ratified; Anti-Corruption Court established; first independent prosecution without NPA approval filed	Years 2–4	Constitutional supermajority in parliament; political will
Asset Disclosure	100% compliance on public online asset-disclosure register for all senior officials; Auditor-General verification completed; first non-disclosure prosecutions filed	Years 1–2	Legislative framework; digital registry infrastructure
Property Rights Framework	Land tenure reform legislation enacted; digital land registry operational; property rights disputes processing time below 90 days	Years 2–5	Political will on land; digital infrastructure from Paper 3
Regulatory Reform	Regulatory impact assessment framework deployed; stock of legacy regulations reviewed; investor compliance costs reduced by 30%+	Years 2–5	Civil service capacity; IDU coordination
Governance Index Target	Zimbabwe reaches top quartile of African nations on Mo Ibrahim Governance Index; Transparency International CPI score above 40	Years 5–10	All preceding reforms delivering measurable outcomes

The governance index target — reaching the top quartile of African nations on the Mo Ibrahim Index and a Transparency International score above 40 — is not a Phase One milestone. It is the Phase Two outcome that Phase One institutional reforms are designed to produce. Governance reputation is rebuilt through demonstrated institutional performance over time, not through announcements. Each of the specific Phase One milestones above is a credible demonstration of institutional intent; sustained delivery against them over five years is what

produces the index improvement that signals to international investors, diaspora professionals, and bilateral partners that Zimbabwe's governance transformation is genuine.



Governance is the mechanism by which vision becomes delivery. Without it, every other reform is an aspiration. With it, every other reform becomes achievable.

SECTION 8**SECTION 8**

8. Restoring Citizen Trust in the State

This paper has addressed governance primarily from the perspective of the institutional architecture that investors, international partners, and reform coalitions require. That framing is analytically necessary — but it risks missing the most fundamental dimension of governance legitimacy: whether ordinary Zimbabwean citizens trust the state that governs them. Investor trust and citizen trust are related but distinct. A country can attract foreign direct investment into a ring-fenced commercial court system while its citizens experience daily governance as extraction, indifference, and arbitrary authority. That gap — between institutional credibility in international markets and experienced governance in daily life — is precisely the gap that produces the political instability that eventually undermines the international institutional credibility itself.

Governance legitimacy in Zimbabwe must be rebuilt not only in the Commercial and Investor Court but at the municipal office, the police station, the clinic, and the business licencing counter. These are the touchpoints where most Zimbabweans actually experience the state — and where the gap between the state's formal commitments and its lived reality is most visible and most damaging.

8.1 Service Delivery as Governance

The most credible signal of governance transformation that the state can send to ordinary citizens is not a constitutional amendment or an investor court ruling. It is a water tap that works, a birth certificate that is issued in a week rather than a month, a school that has textbooks at the start of term, and a clinic that has medicine on its shelves. Service delivery is governance made tangible. When it fails, citizens experience the state as an absent or predatory institution. When it works, it builds the everyday legitimacy that sustains reform coalitions through the inevitable political difficulties that transformation produces.

The connection to Paper 3's infrastructure programme is direct: reliable electricity enables health clinics to refrigerate vaccines, schools to run computers, and municipal water systems to pump. Infrastructure investment is therefore simultaneously an economic productivity investment and a service delivery investment — and the citizen trust it builds is part of the political foundation that the reform programme needs to sustain itself.

8.2 Police Legitimacy and Everyday Corruption

For most Zimbabweans, the most frequent encounter with state authority is not with ZACC or the commercial court. It is with a police officer at a roadblock, a municipal inspector assessing a market stall, or a licensing clerk processing a permit application. At each of these touchpoints, petty corruption — the demand for informal payments to perform official functions — is the daily reality that shapes citizen perceptions of the state. Every petty bribe paid confirms that the state is not an institution of service but an institution of extraction. No amount of high-level anti-corruption prosecution changes this experience if the daily encounter with authority remains extractive.

Reducing petty corruption requires the same structural interventions that reduce high-level corruption, applied at the front-line service delivery level: checklist-based compliance replacing discretionary decisions, anonymous reporting mechanisms, randomised officer allocation, competitive civil service compensation that reduces the economic pressure to supplement income through informal payments, and visible prosecution of petty corruption cases that demonstrates the consequences are real rather than reserved for headlines. The single business registration portal of Section 5.4 is, among other things, a petty corruption reduction mechanism: every interaction it removes from the physical licencing counter is an interaction where an informal payment cannot be demanded.

8.3 Citizen Grievance Systems

Citizens who experience poor service delivery, administrative failure, or official misconduct need accessible mechanisms to report and seek redress — not because every individual grievance will be resolved, but because the existence of a functional grievance system signals that the state is accountable to citizens rather than merely to itself. A grievance system that is inaccessible, slow, or clearly ineffective compounds the original service failure by adding the experience of institutional indifference to it.

- Digital grievance portal: a publicly accessible digital platform enabling citizens to report service delivery failures, official misconduct, and administrative errors, with automatic acknowledgement, case tracking, and published resolution timelines. Integration with the DPI infrastructure of Paper 3 enables access via mobile phone even without desktop internet.
- Municipal accountability dashboards: local authorities publish quarterly service delivery performance data — water availability, refuse collection frequency, road maintenance response times, permit processing timelines — on publicly accessible dashboards, enabling citizens to assess performance against commitments and hold local government accountable through both formal mechanisms and public scrutiny.

- Ombudsman function: an accessible, low-cost public ombudsman with jurisdiction over administrative failures and official misconduct at the service delivery level, providing a remedy pathway for grievances that do not rise to the level of ZACC investigation but represent genuine failures of the state's service obligations.

Citizen trust is not built through announcements. It is built through accumulated experience of a state that does what it says, delivers what it promises, and responds when it fails. The institutional reforms of this paper create the architectural conditions for that experience. Service delivery, police legitimacy, and citizen grievance systems are where those conditions become tangible in the daily lives of the 17 million Zimbabweans this blueprint is ultimately for.

9. What Governance Reform Enables: The Connection to Papers 1–3 and 5–6

Paper 4 does not stand alone. Its value is as the institutional architecture that makes the rest of the blueprint work. This section maps the specific connections — not to duplicate earlier analysis but to make the enabling relationships explicit.

9.1 Governance and Monetary Reform (Paper 2)

Central bank independence is a governance reform. The legal and institutional separation of the RBZ from executive fiscal pressure — the fixed-term appointments, the zero-financing agreement, the parliamentary accountability mechanisms — is precisely the kind of meritocratic, independent institutional design that Axis A of this paper proposes for the civil service and Axis B proposes for the judiciary. A credible central bank requires the same governance architecture as a credible regulatory body: appointment on merit, operation free from political direction, and accountability through transparent public reporting rather than through executive oversight.

9.2 Governance and Infrastructure (Paper 3)

The IDU's statutory mandate, the independent infrastructure regulators, the anti-corruption architecture for procurement — all of these are governance reforms that Paper 3 proposes but whose implementation depends on the institutional environment this paper creates. A meritocratic IDU requires meritocratic appointment processes: precisely what the Public Service Commission reform enables. Independent regulatory bodies require judicial enforcement of their decisions: precisely what the commercial court reform provides. Anti-

corruption procurement enforcement requires a prosecution authority that will act on evidence: precisely what the ZACC constitutional amendment delivers.

9.3 Governance and Agricultural and Mineral Productivity (Paper 5 (Agricultural and Resource Productivity))

Agricultural investment at scale requires property rights security: the land tenure legislation and digital land registry proposed in Section 3.3 of this paper. Mineral beneficiation investment requires contract certainty: the commercial and investor court proposed in Section 3.2. And both require an operating environment in which regulatory compliance is predictable and enforcement is impartial: the regulatory reform programme of Section 5. Governance reform is the precondition for Paper 5 (Agricultural and Resource Productivity)'s agricultural and resource productivity agenda in the same way that energy infrastructure is the precondition for mineral beneficiation.

9.4 Governance and Diaspora Re-engagement (Paper 6)

The diaspora's calculus about whether to return, invest, or contribute professionally to Zimbabwe's development is fundamentally a governance calculation. It is an assessment of whether the institutional environment has changed sufficiently to make their participation rational — whether property rights are secure enough to invest savings, whether contracts are enforceable enough to build a business, whether the anti-corruption environment is credible enough to compete fairly, and whether the civil service is meritocratic enough to offer a genuine professional career. Paper 4's governance reforms are therefore directly and specifically the conditions that Paper 6's diaspora re-engagement programme depends on to succeed.

A final cross-series observation: a recurring question throughout this blueprint is how a reform coalition sustains coordinated execution over twenty years, across multiple election cycles, and against the predictable resistance of interests that benefit from the status quo. This is a question that Paper 4 raises but does not fully answer — because it is ultimately a question about transitional political settlements, elite bargaining, security sector alignment, and the construction of broad-based reform coalitions that transcend individual governments. These questions may warrant their own dedicated treatment in a future paper in this series, addressing the political architecture of transformation rather than its institutional design. For now, they are noted as the frontier question that this project must continue to engage.

TECHNICAL ANNEX

Technical Annex: Implementation Architecture

This annex provides additional technical detail for specialist readers on the key implementation mechanisms discussed in the main paper.

A. Public Service Commission Reform: Legislative Architecture

The reformed Public Service Commission requires a dedicated Public Service Act that:

1. Establishes the PSC as a Chapter 12 constitutional institution with a board of seven commissioners — three appointed by the President on parliamentary advice, two appointed by the Law Society and professional bodies, and two by universities and research institutions — with fixed five-year non-renewable terms and removal only by parliamentary supermajority on grounds of incapacity or proven misconduct
2. Mandates that all civil service positions above Grade C be filled exclusively through PSC-administered competitive processes, with the PSC empowered to annul any appointment that does not comply with this requirement
3. Creates a Technical Specialists Register — a defined list of technical roles in each ministry and regulatory body — for which the Technical Specialists Pay Framework applies, with annual benchmarking against private sector salary surveys and published compensation bands
4. Establishes a Public Appointments Register accessible online, updated within 30 days of every appointment, containing the advertised position description, the assessment criteria applied, the qualifications of the appointee, and the panel members who conducted the assessment

5. Provides the PSC with an independent budget appropriated directly by parliament, not subject to ministerial control or variation

B. Commercial Court: Procedural Framework

The Zimbabwe Commercial and Investor Court Act should establish the following procedural framework:

6. Jurisdiction threshold: all commercial and investment disputes where the amount in dispute or asset value exceeds \$5 million USD, or where the dispute involves an infrastructure concession, mining licence, PPP contract, or investment agreement above \$1 million USD
7. Filing and service: electronic filing system with 24-hour service of process, eliminating the physical filing delays that currently add weeks to commercial litigation timelines
8. Case management: mandatory case management conference within 30 days of filing; disclosure obligations completed within 60 days; trial date set within 120 days of filing for cases where the facts are not in substantial dispute
9. International jurist appointments: the Judicial Appointments Panel to maintain a roster of internationally qualified commercial jurists — drawn from retired senior judges of common law jurisdictions including the UK, Australia, Canada, India, and South Africa — from which the Court's international panel members are assigned on a rotating basis with three-year terms
10. Costs and enforcement: full indemnity costs orders available against parties who engage in unreasonable delay or procedural abuse; Court judgments registrable with the High Court and enforceable through standard High Court enforcement mechanisms plus international enforcement under the New York Convention

C. ZACC Constitutional Amendment: Drafting Framework

The constitutional amendment granting ZACC direct prosecutorial authority requires amendment to Section 254 of the Constitution of Zimbabwe. The key drafting elements:

11. Prosecutorial mandate: Section 254 to be amended to grant ZACC the power to 'investigate, gather evidence, and institute criminal proceedings' in respect of all offences within its mandate, without requiring NPA referral or approval for prosecution decisions
12. Anti-Corruption Court jurisdiction: the amended section to establish the Anti-Corruption Court as a statutory division of the High Court with exclusive jurisdiction

over all ZACC-initiated prosecutions, with case management rules preventing indefinite delays

13. NPA relationship: the amendment to preserve ZACC's existing power to refer matters to the NPA for prosecution while adding the independent prosecutorial pathway, enabling ZACC to choose the more appropriate mechanism on a case-by-case basis
14. Prosecutorial independence safeguards: the ZACC Director of Prosecutions (a new statutory office) to be appointed by the Judicial Service Commission rather than the executive, with the same security of tenure as a High Court judge, ensuring prosecutorial decision-making is insulated from political pressure
15. Anti-Corruption Court judges: assigned from the general High Court bench by the Chief Justice on a rotation basis, with preference for judges with financial crime and commercial expertise, sitting in panels of three for cases involving senior officials

D. Asset Disclosure Framework: Technical Architecture

The public asset disclosure register requires:

- A dedicated digital platform — integrated with the national DPI infrastructure from Paper 3 — enabling electronic declaration submission, public search, and Auditor-General audit access
- Standardised declaration forms covering: real property (domestic and international), financial instruments and investments, business interests and directorships, motor vehicles and other personal property above a defined value, and liabilities and encumbrances
- Verification protocols: automatic cross-referencing of declarations against ZIMRA records, the digital land registry, the companies registry, and immigration records of international travel and property
- Public search interface: all declarations publicly accessible through the national open data portal, with search functionality by official name, ministry, and declaration year, downloadable in machine-readable format to enable civil society and journalism data analysis
- Enforcement mechanism: ZACC to receive automatic notification of non-filing and material inconsistencies identified through Auditor-General verification, with 30-day response requirement before suspension proceedings are initiated
- Ultimate Beneficial Ownership registry integration: the disclosure system cross-references declarations against an Ultimate Beneficial Ownership registry maintained by the Companies Registry, identifying all entities in which the declaring official holds a beneficial interest above 5% regardless of legal ownership structure. Foreign trust and foundation interests disclosed through a dedicated international asset declaration form requiring the disclosure of trust deed details, trustee identities, and

beneficiary schedules for all discretionary arrangements where the official is a potential beneficiary

- Unexplained Wealth Order procedure: ZACC's UWO application is made ex parte to the Anti-Corruption Court, supported by evidence of the divergence between declared income and observed asset profile or lifestyle. The Court issues a provisional asset freeze pending the official's response. The official has 60 days to file a response documenting the lawful source of the assets in question, with ZACC bearing the burden of demonstrating the prima facie divergence and the official bearing the burden of demonstrating lawful acquisition. The UWO process is independent of criminal prosecution — it is a civil asset recovery mechanism that does not require proof beyond reasonable doubt, consistent with comparable frameworks in the UK, Ireland, and Australia

REFERENCES

References

¹ Veritas Zimbabwe / The Zimbabwean (2020). The Zimbabwe Anti-Corruption Commission and its Powers. ZACC has no power to prosecute cases — that power is reserved to the NPA. ZACC can only refer matters to the NPA. <https://www.thezimbabwean.co/2020/07/the-zimbabwe-anti-corruption-commission-and-its-powers-part-1/>

² PPLAAF / Academic literature. ZACC is perceived by many civil society organisations as inept, understaffed and under-resourced, and without any real authority. Lack of prosecutorial powers identified as primary structural deficiency. <https://www.pplAAF.org/country/zimbabwe.html>; Chilunjika et al. (2021), Revamping the ZACC, African Journal of Business and Economic Research. <https://www.researchgate.net/publication/352250863>

³ Singapore Civil Service / European Nexus for Strategic Intelligence (2025). Singapore's Public Service Commission framework: civil servants promoted based on performance not tenure; strict separation of civil service from politics; senior bureaucrats remain in post across political leadership changes. <https://www.intelligencestrategy.org/blog-posts/meritocracy-in-government-leadership-example-of-singapore-ee4ee>

⁴ Wikipedia / AWS Legal Group (2025-2026). DIFC Courts established 2006 under English common law; internationally distinguished judges from leading common law jurisdictions; over 60% of docket involves cross-border transactions; judgments enforceable under New York Convention. https://en.wikipedia.org/wiki/DIFC_Courts; <https://aws-legalgroup.com/difc-courts-system/>

⁵ Borderless Counsel (2025). Singapore International Commercial Court launched 2015; international judges; 91% of SIAC cases involve international parties; 625 new SIAC cases in 2024 from 72 jurisdictions. <https://www.borderlesscounsel.com/blog-news-and-updates/2025/6/30/how-dubai-singapore-and-london-are-competing-for-cross-border-dispute-resolution>

⁶ Chilunjika et al. (2021) / UNCAC Coalition Civil Society Review (2013). Academic literature consistently identifies prosecutorial dependence on politically controlled authorities as primary mechanism by which anti-corruption bodies are neutered despite formal independence mandates. <https://uncaccoalition.org/files/cso-review-reports/year2-zimbabwe-report.pdf>

Zimbabwe Blueprint Initiative

Paper 4 of the Blueprint Series | Next: Paper 5 (Agricultural and Resource Productivity) — Agricultural and Resource Productivity

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