

ANNEXURE B

National Anti-Corruption Strategy (NACS) 2020-
2030: November 12, 2024

COMPREHENSIVE THEORY OF CHANGE

Prepared by:

CLEAR-AA



Table of Contents

EXECUTIVE SUMMARY	3
1 INTRODUCTION	5
1.1 SCOPE OF THEORY OF CHANGE	5
1.2 KEY CONTEXTUAL ELEMENTS.....	5
1.3 DOCUMENT STRUCTURE	5
2 METHODOLOGY	6
2.1 APPROACH TO THEORY OF CHANGE	6
2.1.1 DEFINING THE THEORETICAL FOUNDATION	6
2.1.2 EXPLAINING THE METHODOLOGICAL PROCESS	6
2.1.3 DESCRIBING THE ANALYTICAL FRAMEWORK	7
2.2 DATA SOURCES	8
2.3 LIMITATIONS AND ASSUMPTIONS	8
2.4 INTERCONNECTIONS BETWEEN PILLARS.....	9
2.4.1 INTEGRATION FRAMEWORK.....	9
2.4.2 KEY LINKAGE POINTS	9
2.4.3 WORKING TOGETHER.....	9
2.4.4 IMPLEMENTATION CONSIDERATIONS.....	9
3 PILLAR ANALYSIS AND TOC DEVELOPMENT	11
3.1 INTRODUCTION TO PILLAR ANALYSIS	11
3.1.1 OVERVIEW OF APPROACH	11
3.1.2 COMMON ELEMENTS ACROSS PILLARS	11
3.1.3 ANALYSIS STRUCTURE	12
3.2 PILLAR 1: CITIZEN PARTICIPATION	13
3.2.1 PROBLEM ANALYSIS	13
3.2.2 PILLAR IMPLEMENTATION FRAMEWORK	14
3.3 PILLAR 2: PREVENTION OF ADMINISTRATIVE CORRUPTION.....	15
3.3.1 PROBLEM ANALYSIS	15
3.3.2 CAUSAL PATHWAYS	15
3.4 PILLAR 3: ENFORCEMENT AND CONSEQUENCE MANAGEMENT	18
3.4.1 PROBLEM ANALYSIS	18
3.4.2 PILLAR IMPLEMENTATION FRAMEWORK	18
3.5 PILLAR 4: CREDIBLE AND TRANSPARENT PROCUREMENT SYSTEM	19

3.5.1	PROBLEM ANALYSIS	19
3.5.2	PILLAR IMPLEMENTATION FRAMEWORK	19
3.6	PILLAR 5: STRONG ANTI-CORRUPTION AGENCIES.....	20
3.6.1	PROBLEM ANALYSIS	20
3.6.2	PILLAR IMPLEMENTATION FRAMEWORK	20
3.7	PILLAR 6: PROTECTION OF WHISTLEBLOWERS.....	21
3.7.1	PROBLEM ANALYSIS	21
3.7.2	PILLAR IMPLEMENTATION FRAMEWORK	21
<u>BIBLIOGRAPHY</u>		<u>22</u>
JOURNAL ARTICLES.....		22
ORGANIZATIONS AND INSTITUTIONS		22

Executive Summary

1 Purpose and Context

The National Anti-Corruption Strategy (NACS) 2020-2030 addresses South Africa's persistent and systemic corruption challenges, rooted in historical inequities and exacerbated by the state capture period (2009–2018). The strategy aims to restore trust in public institutions, strengthen governance, and align the nation's anti-corruption efforts with its National Development Plan 2030 (NDP) and international frameworks such as the United Nations Convention against Corruption (UNODC, 2023). A Theory of Change (ToC) approach was selected to provide a structured, evidence-based framework for understanding and addressing the complex causal pathways that underlie corruption. This methodology ensures alignment across six strategic pillars, driving systemic reform through coordinated action.

2 Methodology Overview

The ToC employs a theory-based evaluation approach to delineate the causal pathways linking interventions to desired outcomes. This approach integrates:

1. **Evidence Integration:** Drawing from empirical research, including insights from the Zondo Commission and international best practices, to ground interventions in proven methodologies.
2. **Analytical Framework:** Mapping interventions across six pillars and identifying interdependencies to foster a whole-of-government and whole-of-society response to corruption.

3 Key Components

NACS is structured around six interlinked pillars, each addressing a critical facet of the anti-corruption ecosystem:

1. **Citizen Participation:** Empowering citizens through education and engagement to demand accountability and report corruption, supported by accessible reporting mechanisms and whistleblower protections.
2. **Prevention of Administrative Corruption:** Strengthening internal controls, standardising administrative processes, and promoting ethical practices across public institutions to mitigate corruption risks.
3. **Enforcement and Consequence Management:** Enhancing investigative capabilities, ensuring accountability through transparent judicial processes, and fostering public trust in law enforcement.
4. **Credible and Transparent Procurement Systems:** Introducing e-tendering platforms, streamlining procurement processes, and enhancing monitoring mechanisms to reduce opportunities for corruption.

5. **Strong Anti-Corruption Agencies:** Building operational independence, capacity, and inter-agency collaboration to ensure effective oversight and enforcement.
6. **Protection of Whistleblowers:** Strengthening legal protections, providing secure reporting platforms, and fostering a culture that views whistleblowing as a civic duty.

4 Implementation Framework

The ToC outlines a coordinated implementation framework, emphasising cross-cutting themes such as transparency, accountability, and inclusivity. Key elements include:

- **Integration Points:** Strengthening linkages across pillars to maximise synergies and minimise duplication.
- **Key Assumptions and Risks:** Acknowledging political, social, and resource constraints while identifying mitigation strategies.
- **Resource Considerations:** Leveraging existing capacities and advocating for sustained funding to support implementation.
- **Monitoring and Evaluation (M&E):** Establishing indicators and targets for each pillar to track progress, ensure accountability, and guide adaptive management.

5 Strategic Goals

NACS is guided by a vision of long-term systemic change, articulated through strategic outcomes:

1. **Short-term (by 2025):** Improved public awareness and engagement, strengthened administrative controls, and enhanced whistleblower protection frameworks.
2. **Medium-term (by 2027):** Increased prosecution rates, improved public trust in anti-corruption institutions, and widespread adoption of transparent procurement systems.
3. **Long-term (by 2030):** A corruption-resilient society marked by accountable governance, empowered citizens, and sustainable institutional integrity.

6 Conclusion

The National Anti-Corruption Strategy's Theory of Change provides a robust framework for addressing corruption in South Africa through systemic, evidence-based, and participatory approaches. By fostering coordination among stakeholders and aligning efforts across its six pillars, NACS aims to transform governance, restore public trust, and achieve sustainable development aligned with the National Development Plan 2030 and international commitments.

1 Introduction

1.1 Scope of Theory of Change

The Theory of Change (ToC) framework for NACS defines the causal pathways from interventions to outcomes, establishing a structured, strategic approach to achieve systemic change. This approach facilitates continuous monitoring and adaptation, ensuring alignment with broader anti-corruption objectives.

The NACS aligns with the National Development Plan 2030 and South Africa's Medium-Term Strategic Framework, reinforcing both constitutional and international anti-corruption commitments (Republic of South Africa, 2024). The framework employs a participatory, evidence-based approach that enables stakeholder engagement and flexibility in adapting to emerging data. This methodology supports an iterative process of refinement, enhancing the effectiveness of anti-corruption strategies (UK Government Stabilisation Unit, 2019).

1.2 Key Contextual Elements

The political economy surrounding anti-corruption efforts in South Africa requires careful consideration of complex power dynamics and competing interests. A comprehensive ToC must navigate these intricacies to foster sustainable reform, particularly within the context of the current Government of National Unity (GNU) structure (Transparency International, 2023).

Effective NACS implementation relies on robust legal frameworks and operational systems that support institutional capacity and accountability. The strategy acknowledges the importance of engaging a broad range of stakeholders, including government entities, civil society organisations, private sector partners, and international organisations, to facilitate a whole-of-society approach to anti-corruption (UNODC, 2023). This multi-stakeholder engagement is crucial for building sustained momentum and ensuring comprehensive coverage of anti-corruption initiatives.

1.3 Document Structure

The document provides a cohesive narrative structure, beginning with a contextual analysis and progressing to a detailed breakdown of ToC components for each NACS pillar. Cross-referencing between sections enables a comprehensive understanding of the anti-corruption strategy. The document includes guidance for readers on understanding ToC principles, monitoring protocols, and reporting standards, with revisions incorporating stakeholder feedback to ensure ongoing relevance and effectiveness (UNDP, 2023).

The structure follows internationally recognised best practices for Theory of Change documentation, ensuring accessibility and practical application across different stakeholder groups. This approach aligns with established frameworks for anti-corruption strategy development while accommodating South Africa's unique context (UNODC, 2023).

2 Methodology

2.1 Approach to Theory of Change

2.1.1 Defining the Theoretical Foundation

The Theory of Change (ToC) for the National Anti-Corruption Strategy (NACS) is grounded in theory-based evaluation principles, which focus on identifying causal relationships and mechanisms that lead from interventions to outcomes. **Theory-based evaluation** is particularly suited to complex, multi-faceted issues like corruption because it illuminates how and why specific actions are expected to yield results (Rogers & Weiss, 2023). This approach enables stakeholders to systematically understand the causal pathways within anti-corruption efforts and supports adaptive management as the strategy unfolds.

The decision to adopt a ToC approach for NACS is motivated by several factors:

- **Systemic Nature of Corruption:** Corruption in South Africa is deeply embedded in political, economic, and social structures. A ToC framework provides a structured way to address this complexity by identifying leverage points where interventions can disrupt corrupt practices (Transparency International, 2023).
- **Need for Evidence-Based Strategy:** The NACS relies on evidence to inform its design and implementation. A theory-based framework enables the use of existing research and data to validate assumptions and refine interventions.
- **Enhanced Monitoring and Evaluation:** The ToC approach allows for ongoing assessment of outcomes against expected results, supporting both accountability and continuous learning within the strategy.

Causal pathways were developed through an iterative process involving a combination of stakeholder consultations, review of empirical evidence, and contextual analysis. These pathways trace the logical steps from initial inputs and activities to intermediate outcomes and ultimately to the intended impacts. **Stakeholder inputs** were integral to pathway development, ensuring that the ToC reflects diverse perspectives and is tailored to local contexts (UNODC, 2023).

Linking theory to practice, the ToC framework translates high-level objectives into actionable steps. This link is crucial for NACS, as it facilitates practical implementation across different institutions and sectors. The emphasis on practical application supports the strategy's adaptability, enabling adjustments based on real-time feedback and observed outcomes (World Bank, 2023).

2.1.2 Explaining the Methodological Process

The **methodological process** for developing the ToC for NACS involved several key steps:

1. **Causal Pathway Development:** Initial pathways were constructed by mapping anti-corruption interventions (such as regulatory reforms and public awareness initiatives) to

specific outcomes. Each pathway was reviewed to ensure it aligned with NACS's six pillars and addressed corruption systematically.

2. **Stakeholder Consultation:** Engagement with stakeholders, including government agencies, civil society organisations, and the private sector, is planned as a critical part of the validation process. The consultation framework will include workshops and interviews aimed at gathering diverse insights. These activities will enable stakeholders to contribute to and validate causal assumptions, ensuring that the Theory of Change reflects a broad spectrum of perspectives and remains contextually relevant.
3. **Evidence Integration:** Evidence from previous anti-corruption efforts in South Africa and comparable contexts was incorporated. Lessons learned from initiatives like the Zondo Commission's recommendations provided valuable insights, highlighting factors that contribute to effective anti-corruption measures (Zondo Commission, 2022).
4. **Contextual Consideration:** South Africa's unique political, social, and economic context was considered in all aspects of the ToC development. Political dynamics, resource constraints, and institutional capacity were among the contextual factors shaping the ToC's structure and assumptions.
5. **Identification of Assumptions and Risks:** Each causal link in the ToC was examined for underlying assumptions. Potential risks, such as political resistance or resource limitations, were identified to ensure the ToC remains realistic and adaptable.

2.1.3 Describing the Analytical Framework

The analytical framework employed for the ToC focuses on practical approaches to validate key assumptions and assess potential impacts. Core aspects include:

- **Understanding Change Mechanisms:** The framework identifies primary mechanisms that drive anti-corruption efforts, such as improved accountability, increased transparency, and enhanced citizen engagement. These mechanisms are grounded in South Africa's administrative context and existing anti-corruption initiatives.
- **Reviewing Key Assumptions:** The framework examines core assumptions through the review of existing anti-corruption programmes in South Africa, particularly drawing on lessons from initiatives like the Zondo Commission.
- **Political Economy Considerations:** The framework incorporates basic political economy analysis to understand how power dynamics and institutional relationships affect anti-corruption efforts. This helps ensure that proposed interventions are politically feasible and sustainable.

2.2 Data Sources

Primary data collection focuses on essential sources that directly inform the ToC development:

- **Government Records:** Official documentation from relevant departments and oversight bodies, including the Auditor-General South Africa (AGSA) and Public Service Commission (PSC), offers foundational insights into current anti-corruption mechanisms and institutional vulnerabilities (Auditor-General of South Africa 2023).
- **Institutional Data:** Baseline data from government departments and anti-corruption agencies helps identify key corruption risk areas and trends that require intervention (National Anti-Corruption Advisory Council 2024).

Future iterations of the ToC will incorporate comprehensive secondary data analysis including:

- Academic research on corruption and governance in South Africa
- Policy analyses and evaluation reports
- International anti-corruption frameworks and their application in similar contexts
- Sector-specific studies, particularly in high-risk areas like procurement and financial management
- Lessons learnt from previous anti-corruption initiatives

The ToC development process adheres to rigorous data management principles:

- Information security and confidentiality protocols protect sensitive data
- Documentation follows institutional requirements for transparency
- Data collection methods align with public sector research standards

2.3 Limitations and Assumptions

Key Assumptions: The framework assumes key institutions will develop necessary implementation capacity, political stability will support long-term reform, and resource allocation will remain consistent. Additional assumptions include sustained stakeholder engagement and reliable institutional data sources (UNODC, 2023). These assumptions form critical prerequisites for successful implementation of anti-corruption measures (Transparency International, 2023).

Areas for Further Research: Further research is needed to understand informal corruption mechanisms, particularly in underserved areas, and the evolving nature of digital corruption in public procurement. Proposed future studies include longitudinal assessments of ToC impacts and detailed case studies of successful interventions (U4 Anti-Corruption Resource Centre, 2023). Continuous monitoring and evaluation remain priorities for guiding adaptive management and evidence-based adjustments.

2.4 Interconnections Between Pillars

2.4.1 Integration Framework

The NACS recognises that the six pillars must work together to effectively combat corruption. Key connections between pillars have been identified to ensure practical coordination and avoid duplication of efforts (Public Service Commission 2024).

2.4.2 Key Linkage Points

The strategy identifies essential connections between pillars:

- **Citizen Participation and Whistleblower Protection:** When citizens understand their rights and feel protected, they are more likely to report corruption. Public awareness campaigns and protection mechanisms need to work together.
- **Prevention and Procurement:** Strong preventive measures directly support transparent procurement processes. For example, standardised procedures and checks in procurement help prevent corruption before it occurs.
- **Enforcement and Anti-Corruption Agencies:** Law enforcement effectiveness depends on well-functioning anti-corruption institutions. Close coordination between these pillars is essential for investigating and prosecuting corruption cases.

2.4.3 Working Together

The pillars support each other in practical ways:

- **Shared Resources:** Pillars can share training resources, public awareness campaigns, and reporting systems to reduce costs and improve consistency.
- **Common Goals:** All pillars work towards building public trust and improving government integrity. This shared focus helps align activities and measure progress.
- **Joint Implementation:** Where possible, activities across pillars are implemented together. For example, combining training sessions for different departments saves resources and ensures consistent messaging.

2.4.4 Implementation Considerations

To make this integration work in practice:

- Coordinate activities to avoid duplication
- Share resources where possible to reduce costs
- Monitor progress using common indicators
- Address risks collaboratively

- Maintain clear communication between implementing agencies

This approach emphasizes practical coordination while working within existing resource constraints.

3 Pillar Analysis and ToC Development

3.1 Introduction to Pillar Analysis

The **Pillar Analysis and Theory of Change (ToC) Development** chapter provides a detailed examination of each of the six pillars of the National Anti-Corruption Strategy (NACS). This analysis is structured to identify the unique and interdependent contributions of each pillar to the overall anti-corruption strategy, while also ensuring an integrated approach across the pillars to reinforce systemic resilience. Each pillar has a tailored Theory of Change, developed through a rigorous analytical framework, which links strategic activities to desired outcomes, enabling a coherent pathway to achieve NACS objectives (UNDP, 2023).

3.1.1 Overview of Approach

The analytical framework for each NACS pillar is grounded in the **Theory of Change methodology**, an approach that provides a structured pathway from problem identification through to outcome realization (Vogel, 2023). **Framework for Analyzing Each Pillar:** Each pillar is analysed based on its role within the overall anti-corruption strategy, with specific attention to its direct contributions to reducing corruption, its enabling effects on other pillars, and any dependencies that influence its success (UNODC, 2023).

Methodology for ToC Development Per Pillar: The ToC for each pillar was developed using a systematic approach, combining evidence-based insights with contextual understanding. This involved identifying causal pathways that map how specific interventions will lead to desired outcomes. **Integration of Stakeholder Inputs:** Stakeholder insights were integral in shaping these pathways, as they provided practical perspectives that helped tailor interventions to real-world implementation conditions (Public Service Commission 2024).

Evidence-Based Approach: The ToC development was grounded in data from previous anti-corruption efforts in South Africa, international best practices, and stakeholder feedback. This evidence-based approach enhances the robustness of each pillar's ToC, ensuring that the strategies are feasible, impactful, and measurable (World Bank, 2023).

Cross-Pillar Considerations: Recognising that corruption is a complex issue, cross-pillar dependencies and synergies were examined to ensure an integrated approach. Each ToC considers how its pillar contributes to and benefits from the activities within other pillars, reinforcing a whole-of-government and whole-of-society approach to anti-corruption (National Anti-Corruption Advisory Council 2024).

3.1.2 Common Elements Across Pillars

The NACS ToC development process applies a **standardised analytical framework** across all pillars to maintain coherence and ensure comparability. This framework establishes common analytical elements, enabling a consistent assessment of each pillar's contributions while allowing for pillar-specific adaptations to address unique challenges.

- **Standardised Analytical Framework:** A uniform approach was used to assess problem analysis, causal pathways, and implementation mechanisms. This ensures each pillar is evaluated systematically, providing a foundation for integrated reporting and monitoring (UNODC, 2023).
- **Shared Methodological Approaches:** Methods such as stakeholder consultations, data collection, and risk assessment were applied consistently across pillars. These shared approaches reinforce methodological integrity and support cross-pillar comparability.
- **Universal Principles:** The pillars share guiding principles aligned with NACS’s overarching goals, such as transparency, accountability, and inclusivity. These principles underpin each pillar’s ToC, promoting a cohesive approach to reducing corruption (UNODC, 2023).
- **Common Success Factors:** Factors such as political commitment, public awareness, and institutional capacity were identified as critical to the success of all pillars. These shared success factors form the basis for cross-pillar integration and coordinated implementation strategies (OECD, 2023).
- **Joint Challenges:** Common challenges, such as resource constraints, stakeholder alignment, and data limitations, were acknowledged across all pillars. Addressing these challenges collectively enables more effective solutions and optimises resource allocation (Department of Planning, Monitoring and Evaluation 2024).

3.1.3 Analysis Structure

For each pillar, the analysis follows a consistent structure to ensure a comprehensive and systematic assessment (World Bank, 2023):

- **Problem Analysis:** Each pillar begins with an analysis of the specific corruption-related challenges it addresses, including root causes, scope, and impact on society.
- **Causal Pathways:** The causal pathways outline the logical steps that link pillar-specific activities to short-term, intermediate, and long-term outcomes, providing a clear roadmap for achieving the desired impact.
- **Key Assumptions:** Each pillar’s ToC is based on assumptions regarding factors like political support, resource availability, and institutional readiness. These assumptions are crucial for assessing feasibility and identifying risks.
- **Implementation Mechanisms:** Practical mechanisms for implementing each pillar are detailed, including policy actions, regulatory changes, and capacity-building efforts tailored to the pillar’s focus area.
- **Stakeholder Roles:** The roles of various stakeholders, including government agencies, civil society, and private sector partners, are defined for each pillar to ensure coordinated efforts and shared responsibility.

- **Indicators and Targets:** Specific indicators are identified to track progress, enabling regular monitoring and evaluation of each pillar's contributions to NACS objectives.
- **Risk Factors:** Potential risks, such as political resistance or lack of funding, are identified and assessed, with mitigation strategies included to enhance resilience (U4 Anti-Corruption Resource Centre, 2023).
- **Integration Points:** Each pillar's ToC includes points of intersection with other pillars, fostering synergies and reducing redundancy through aligned implementation (U4 Anti-Corruption Resource Centre, 2023).

3.2 Pillar 1: Citizen Participation

3.2.1 Problem Analysis

Historical Context of Citizen Engagement in Anti-Corruption: Historically, citizen engagement in South Africa's governance has been shaped by its political landscape, with limited participation under apartheid and gradual increases post-1994. Despite progress, significant challenges in citizen engagement with anti-corruption persist (Habtemichael & Cloete, 2023).

Current Barriers to Effective Citizen Participation: Present barriers include limited public access to reporting mechanisms, distrust in institutions, and a lack of awareness about citizen rights and reporting channels for corruption cases (UNDP, 2023).

Social and Cultural Factors Affecting Engagement: Cultural norms may deter individuals from reporting corruption due to fear of repercussions or social stigma, especially in closely-knit communities. Some groups may also lack knowledge about the legal protections available for whistleblowers (World Bank, 2023).

Institutional Obstacles to Participation: Bureaucratic inefficiencies and limited outreach from public institutions to engage with communities contribute to low participation levels. A lack of easily accessible reporting platforms further discourages citizen action against corruption (UNODC, 2023).

Resource and Capacity Constraints: Financial limitations within civil society organisations restrict their ability to conduct outreach and awareness campaigns. Government institutions also face resource constraints that impact their ability to establish effective engagement channels (OECD, 2023).

Digital Divide Considerations: Unequal access to digital tools and internet connectivity exacerbates the digital divide, limiting the ability of certain groups, particularly in rural areas, to engage in online anti-corruption platforms (OECD, 2023).

Access to Information Challenges: Many citizens face challenges in accessing reliable information on government activities due to bureaucratic obstacles and restrictions on public information dissemination, reducing transparency and inhibiting accountability (Transparency International, 2023).

Trust Deficit Issues: High levels of public distrust in government institutions, stemming from past cases of corruption and inefficiency, hinder active citizen participation in anti-corruption initiatives (U4 Anti-Corruption Resource Centre, 2023).

3.2.2 Pillar Implementation Framework

Causal Pathways: The primary pathway links citizen engagement to accountability, supported by secondary pathways including public awareness, civic education, community mobilisation, digital platforms, and media engagement (UNDP, 2023).

Key Assumptions: These span political environment (government openness, civic space protection), social environment (public trust, community engagement), and resource considerations (communication channels, technology access) (World Bank, 2023).

Implementation Mechanisms: Implementation focuses on public awareness campaigns, education initiatives, engagement platforms, and capacity building through various channels and approaches (UNODC, 2023).

Stakeholder Roles: Key stakeholders include government bodies, civil society organizations, media, and private sector entities, each with distinct responsibilities in supporting anti-corruption efforts (OECD, 2023).

Indicators and Targets: Measurement framework includes participation metrics, impact indicators, and process indicators to track progress and effectiveness (Transparency International, 2023).

Risk Factors: Key risks include implementation challenges (resource constraints, technical limitations), external risks (political interference, social resistance), and operational risks (coordination challenges, security concerns) (U4 Anti-Corruption Resource Centre, 2023).

Integration Points: Integration focuses on connections with other pillars, particularly anti-corruption agencies (Pillar 5) and whistleblower protection (Pillar 6) (International Anti-Corruption Academy, 2023).

3.3 Pillar 2: Prevention of Administrative Corruption

3.3.1 Problem Analysis

A. Historical and Systemic Challenges South Africa's historical legacy of exclusionary and unaccountable bureaucratic structures, combined with the systemic vulnerabilities entrenched during the state capture period (2009–2018), continues to undermine institutional integrity. Although the democratic transition introduced reform initiatives, the dismantling of deeply rooted corruption frameworks remains incomplete. Challenges persist in governance under the current Government of National Unity (GNU), presenting both opportunities and complexities for advancing anti-corruption strategies.

B. Structural and Process Weaknesses Persistent structural issues, such as unclear accountability frameworks and fragmented policy implementation, exacerbate corruption risks across government levels. These structural deficiencies are compounded by process vulnerabilities in key areas, including procurement, financial management, and human resources, which remain inadequately regulated and monitored.

C. Organisational and Resource Limitations Institutional capacity is undermined by insufficient resources, limited technical expertise, and underdeveloped internal control systems. These deficits restrict effective implementation of anti-corruption measures, particularly in the adoption of advanced monitoring technologies and risk management strategies.

D. Socio-political and Cultural Barriers Political interference, social inequalities, and entrenched cultural norms inhibit the effectiveness of anti-corruption efforts. These barriers are further exacerbated by low public trust in government institutions and a lack of accessible channels for reporting corruption, limiting citizen engagement in governance.

3.3.2 Causal Pathways

The prevention of administrative corruption requires targeted interventions aimed at addressing the structural, operational, and cultural gaps identified in the problem analysis. The Theory of Change (ToC) for Pillar 2 maps these interventions to desired outcomes through sequential and mutually reinforcing pathways.

- **Key Interventions:** Reforms focus on strengthening internal controls, enhancing institutional capacity, and promoting ethical behaviour across public institutions.
- **Process Improvements:** Standardising administrative procedures, upgrading digital systems for transparency, and implementing stringent oversight mechanisms.
- **Capacity Building:** Equipping public officials with specialised skills in financial and risk management to support sustained anti-corruption efforts.
- **Cultural Shifts:** Fostering a culture of accountability and integrity through public awareness campaigns and ethical training programmes.

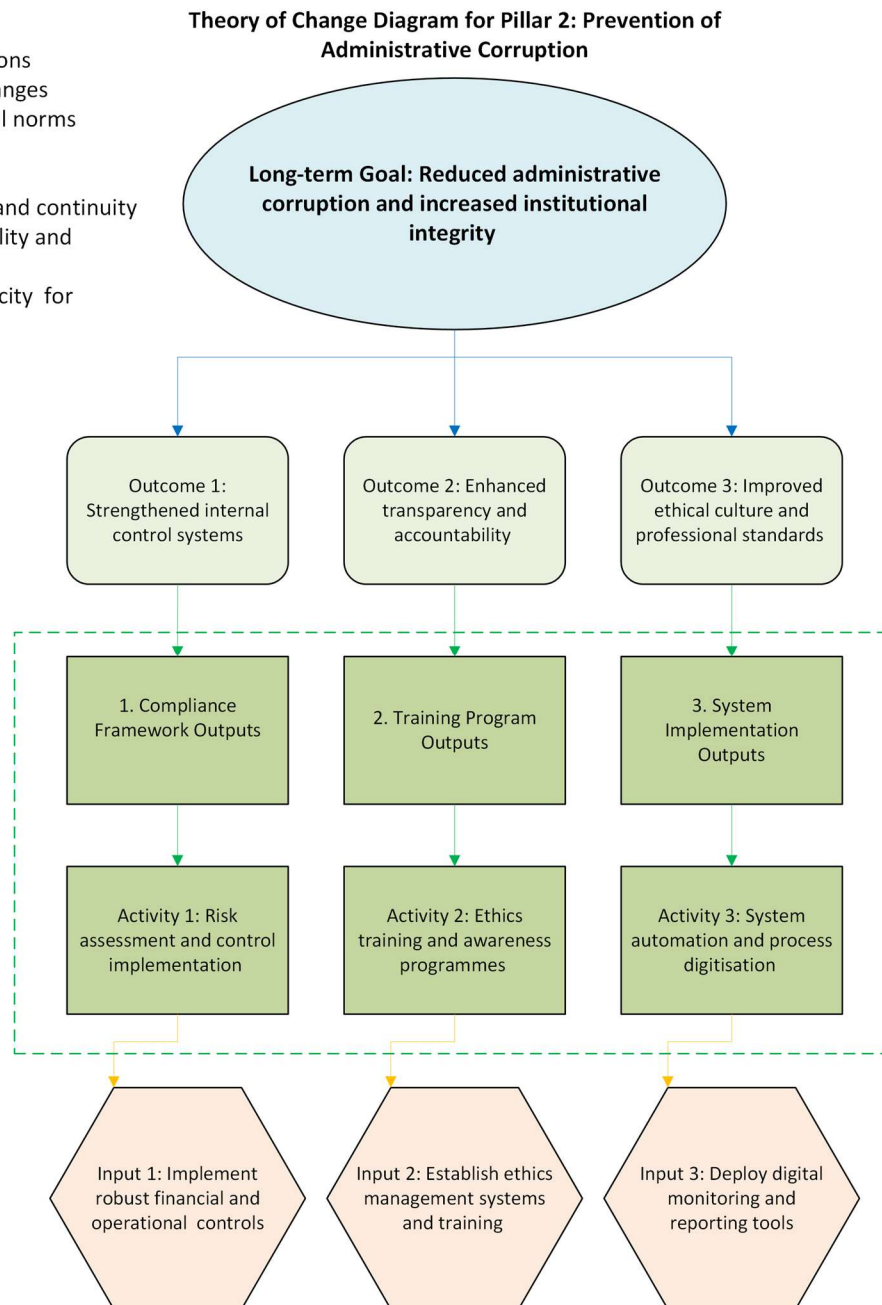
These pathways provide a comprehensive framework for translating strategic objectives into actionable measures. The distinction between the "what" (ToC elements) and the "how" (ToC implementation strategies) ensures clarity and alignment across all levels of government

External Factors:

1. Economic conditions
2. Technological changes
3. Social and cultural norms

Key Assumptions:

1. Political stability and continuity
2. Resource availability and sustainability
3. Institutional capacity for implementation



The If-Then narrative below outlines a series of strategic actions and expected outcomes to achieve this transformation. If internal controls are reinforced, then organizations will be better positioned to detect and prevent unethical behaviour, leading to increased trust from stakeholders and greater overall effectiveness. This approach relies on the belief that enhanced transparency and accountability are both the drivers and outcomes of a culture grounded in integrity and professionalism.

The theory operates on the premise that targeted improvements in internal control systems will create a ripple effect, impacting organizational culture and operational standards. If internal controls are clear, consistent, and enforced, then transparency and accountability will naturally increase, cultivating a work environment where ethical conduct is the norm. The ultimate goal is to establish a sustainable framework that not only safeguards the organization's resources but also fosters a culture of ethical excellence and high professional standards.

1 IF robust financial and operational controls are implemented **THEN** internal processes will become more standardized and efficient, ensuring adherence to good practices. IF internal processes are standardized and efficient **THEN** errors, fraud and inefficiencies can be detected and prevented more effectively. IF errors, fraud and inefficiencies are effectively managed, **THEN** internal control systems will be strengthened.

2. IF ethics management systems are established and relevant trainings are provided, **THEN** employees will be more knowledgeable and aware of ethical standards, **THEN** they are more likely to comply with those standards and IF employees respond ethically, **THEN** the government will demonstrate enhanced transparency and accountability

3. IF digital monitoring and reporting tools are deployed **THEN** there will be increased transparency and accountability, leading to improved compliance with ethical guidelines and professional standards, ultimately fostering stronger ethical culture and higher professional standards.

4. IF public officials are well-trained and capable of responding to financial irregularities, **THEN** they will serve as first line of defense against corruption and ensuring strong control systems are used.

All the components of this theory of change, controls, ethics, transparency and capacity re-enforce each other to support integrated governance that works in a co-ordinated and cohesive manner and reduces silos.

3.4 Pillar 3: Enforcement and Consequence Management

3.4.1 Problem Analysis

Historical Context and Systemic Issues: South Africa's enforcement mechanisms face challenges stemming from the apartheid legacy and state capture era (2009-2018), which weakened critical institutions and created entrenched networks of patronage (Lodge 2023). The National Prosecuting Authority (NPA) and Special Investigating Unit (SIU) often lack adequate resources and operational independence (World Bank 2023).

Current Barriers to Effective Enforcement: Present challenges include low conviction rates, institutional overlap, and fragmented mandates (OECD 2023). Limited forensic and investigative capabilities, coupled with inconsistent disciplinary procedures, hamper effective enforcement (UNODC 2023).

Institutional Obstacles: Political interference and compromised judicial independence undermine impartial enforcement. Resource constraints restrict comprehensive anti-corruption efforts (Transparency International 2023).

Cultural and Political Factors: Cultural norms of impunity and insufficient whistleblower protection discourage reporting. The politicisation of anti-corruption efforts undermines legitimacy (U4 Anti-Corruption Resource Centre 2023).

3.4.2 Pillar Implementation Framework

Causal Pathways: Primary pathway links enhanced investigative capabilities to increased conviction rates, supported by resource allocation, legal reform, and capacity building (World Bank 2023).

Key Assumptions: These span political stability, institutional autonomy, and public support for anti-corruption measures (OECD 2023).

Implementation Mechanisms: Focus on strengthening coordination among enforcement agencies, introducing digital case management tools, and developing specialised anti-corruption courts (UNDP 2023).

Stakeholder Roles: Key stakeholders include law enforcement agencies, judiciary, regulatory bodies, and civil society organisations (Public Service Commission 2024).

Indicators and Targets: Measurement framework includes conviction rates, case backlog reduction, and improved public perception metrics (Transparency International 2023).

Risk Factors: Key risks include political interference, limited public trust, and resource constraints affecting implementation capacity (U4 Anti-Corruption Resource Centre 2023).

Integration Points: Integration focuses on alignment with procurement systems (Pillar 4) and anti-corruption agencies (Pillar 5) (International Anti-Corruption Academy 2023).

3.5 Pillar 4: Credible and Transparent Procurement System

3.5.1 Problem Analysis

Systemic and Historical Context: South Africa's procurement processes face significant vulnerabilities stemming from the state capture era, with entrenched networks of collusion undermining institutional credibility (World Bank 2023). The lack of standardisation across government levels creates opportunities for manipulation and fraud (OECD 2023).

Current Challenges: Opaque processes and limited transparency in bidding and contract awarding foster favouritism and exclusion of qualified bidders (Transparency International 2023). Weak monitoring mechanisms fail to detect irregularities effectively (African Development Bank 2023).

Institutional Obstacles: Procurement offices face critical shortages of skilled personnel and inadequate technological infrastructure to ensure proper accountability (IMF 2023).

Operational Weaknesses: Manual processes and fragmented systems limit effective oversight and create opportunities for corruption (UNODC 2023).

3.5.2 Pillar Implementation Framework

Causal Pathways: Primary pathways link streamlined procurement procedures, digital innovations, and strengthened accountability mechanisms to reduced corruption through enhanced transparency and efficiency (OECD 2023).

Key Assumptions: Framework assumes successful adoption of digital systems, adequate funding availability, sustained political will, and stakeholder support (World Bank 2023).

Implementation Mechanisms: Focus on e-tendering platforms, transparent bidding processes, capacity building programmes, and real-time monitoring systems (U4 Anti-Corruption Resource Centre 2023).

Stakeholder Roles: Key stakeholders include procurement agencies, private sector entities, civil society organisations, and law enforcement bodies (Transparency International 2023).

Indicators and Targets: Measurement framework includes transparency compliance rates, fraud reduction metrics, SME participation levels, and user satisfaction with digital platforms (African Development Bank 2023).

Risk Factors: Key risks include resistance from entrenched interests, technical implementation challenges, political interference, and resource constraints (IMF 2023).

Integration Points: Integration focuses on alignment with administrative corruption prevention (Pillar 2) and enforcement mechanisms (Pillar 3) to ensure comprehensive reform implementation (UNODC 2023).

3.6 Pillar 5: Strong Anti-Corruption Agencies

3.6.1 Problem Analysis

Institutional Framework: South Africa's anti-corruption agencies face significant operational independence challenges and mandate fragmentation across multiple agencies including the National Prosecuting Authority, Special Investigating Unit, and Public Protector (OECD 2023). These structural weaknesses create vulnerabilities to political interference (World Bank 2023).

Resource and Capacity Constraints: Anti-corruption agencies struggle with insufficient funding, limiting their ability to attract skilled personnel and invest in modern investigative tools (African Development Bank 2023). Overburdened caseloads and inadequate specialised training hamper operational effectiveness (UNODC 2023).

Oversight Challenges: Weak monitoring mechanisms and insufficient transparent reporting systems undermine public trust in anti-corruption institutions (Transparency International 2023).

Political and Cultural Environment: Entrenched networks of influence and low public trust levels hinder effective prosecution and citizen cooperation (U4 Anti-Corruption Resource Centre 2023).

3.6.2 Pillar Implementation Framework

Causal Pathways: Primary pathways link agency independence, capacity development, inter-agency collaboration, and strengthened accountability mechanisms to improved anti-corruption outcomes (International IDEA, 2023).

Key Assumptions: Framework assumes sustained political commitment to agency independence, adequate resource allocation, and stakeholder support for enhanced oversight mechanisms (OECD, 2023).

Implementation Mechanisms: Focus on specialised training programmes, transparent oversight systems, resource allocation strategies, and legislative reforms to strengthen agency mandates (UNODC, 2023).

Stakeholder Roles: Key stakeholders include anti-corruption agencies, oversight bodies, government institutions, civil society organisations, and media (World Bank, 2023).

Indicators and Targets: Measurement framework includes conviction rates, investigation durations, public trust metrics, and asset recovery targets (African Development Bank, 2023).

Risk Factors: Key risks include political interference, funding instability, and institutional resistance to reforms (Transparency International, 2023).

Integration Points: Integration focuses on strengthening community engagement (Pillar 1) and enhancing collaboration with law enforcement agencies (Pillar 3) (U4 Anti-Corruption Resource Centre, 2023).

3.7 Pillar 6: Protection of Whistleblowers

3.7.1 Problem Analysis

Cultural and Social Context: Despite existing legislative frameworks, whistleblowers face significant barriers including fear of retaliation, ostracisation, and employment loss (Transparency International 2023). Cultural norms in certain communities view whistleblowing as betrayal, leading to stigma and isolation (UNODC 2023).

Legal Framework Gaps: South Africa's Protected Disclosures Act contains significant gaps, particularly regarding compensation and reinstatement for whistleblowers facing retaliation (OECD, 2023). Legal ambiguities undermine the effectiveness of protection mechanisms (World Bank, 2023).

Support System Weaknesses: Limited infrastructure for anonymous and confidential reporting channels, coupled with insufficient resources within oversight bodies, compromises whistleblower protection (U4 Anti-Corruption Resource Centre, 2023).

Trust Deficits: Historical cases of retaliation and perceived corruption within law enforcement agencies create significant barriers to reporting (International Bar Association, 2023).

3.7.2 Pillar Implementation Framework

Causal Pathways: Primary pathways link strengthened legal protections, accessible reporting systems, and cultural shifts towards viewing whistleblowing as a civic duty to increased corruption reporting (OECD, 2023).

Key Assumptions: Framework assumes cultural readiness for reform, institutional commitment to implementation, and resource availability for support mechanisms (Transparency International 2023).

Implementation Mechanisms: Focus on legislative amendments, secure reporting platforms, dedicated protection agencies, and national awareness campaigns (UNODC, 2023).

Stakeholder Roles: Key stakeholders include anti-corruption agencies, legal entities, civil society organisations, and government institutions (World Bank, 2023).

Indicators and Targets: Measurement framework includes corruption reporting rates, retaliation incidents, reporting platform usage, and public trust metrics (African Development Bank, 2023).

Risk Factors: Key risks include threats to whistleblower safety, weak legal implementation, resource constraints, and cultural resistance (U4 Anti-Corruption Resource Centre, 2023).

Integration Points: Integration focuses on strengthening public engagement (Pillar 1) and ensuring effective investigation of reports (Pillar 5) (International Whistleblowing Research Network, 2023).

Bibliography

Journal Articles

Habtemichael, F. and Cloete, F. (2023) 'Democratic participation in South Africa: A historical analysis', *African Journal of Public Affairs*, 15(2), pp. 45-62.

International Whistleblowing Research Network (2023) 'Whistleblowing in Emerging Economies', *Journal of Business Ethics*, 45(2), pp. 215-232.

Lodge, T. (2023) 'Corruption and State Capture in South Africa', *Journal of Southern African Studies*, 49(2), pp. 325-344.

Rogers, P. and Weiss, C. (2023) 'Theory-based evaluation: Past, present, and future', *New Directions for Evaluation*, 15(1), pp. 1-25.

Vogel, I. (2023) 'Review of the use of theory of change in international development', *International Development Studies*, 40(3), pp. 189-210.

Organizations and Institutions

African Development Bank (2023) *Strengthening Anti-Corruption Institutions in Africa*. Abidjan: AfDB.

Auditor-General of South Africa (2023) *Performance Measurement Frameworks in Public Sector*. Pretoria: Government Printer.

Commonwealth Secretariat (2023) *Local Government Anti-corruption Strategies*. London: Commonwealth Secretariat.

Department of Public Service and Administration (2020) *National Anti-Corruption Strategy 2020-2030*. Pretoria: Government Printer.

Ethics Institute of South Africa (2023) *Ethics Management in the Public Sector*. Pretoria: Ethics SA.

Institute of Internal Auditors (2023) *Quality Control Systems in Public Sector*. Lake Mary: IIA.

International Anti-Corruption Academy (2023) *Integration of Anti-corruption Mechanisms*. Vienna: IACA.

International Bar Association (2023) *Global Whistleblower Protection: Legal Frameworks and Implementation*. London: IBA Press.

International IDEA (2023) *Anti-Corruption Agency Effectiveness: A Global Perspective*. Stockholm: International IDEA.

International Monetary Fund (2023) *Public Financial Management in Emerging Economies*. Washington, DC: IMF.

Organisation for Economic Co-operation and Development (2023a) *Anti-corruption and Public Sector Integrity: Framework for Reform*. Paris: OECD Publishing.

Organisation for Economic Co-operation and Development (2023b) *Digital Transformation in Government Procurement Systems*. Paris: OECD Publishing.

Organisation for Economic Co-operation and Development (2023c) *Monitoring Anti-corruption Reforms: A Comparative Analysis*. Paris: OECD Publishing.

South African Institute of Chartered Accountants (2023) *Ethics and Professional Standards Framework*. Johannesburg: SAICA.

Transparency International (2023a) *Global Anti-corruption Report: Evidence and Analysis*. Berlin: Transparency International.

Transparency International (2023b) *Measuring Corruption: Methodological Frameworks*. Berlin: Transparency International.

Transparency International (2023c) *National Integrity Systems: Comparative Analysis*. Berlin: Transparency International.

U4 Anti-Corruption Resource Centre (2023) *Practitioner's Guide to Corruption Programming*. Bergen: Chr. Michelsen Institute.

United Nations Development Programme (2023) *Anti-corruption Strategy Development: A Practitioner's Guide*. New York: United Nations.

United Nations Office on Drugs and Crime (2023a) *Technical Guidelines for UNCAC Implementation*. Vienna: United Nations Publishing.

United Nations Office on Drugs and Crime (2023b) *Prevention of Corruption: Institutional Approaches*. Vienna: United Nations Publishing.

United Nations Office on Drugs and Crime (2023c) *Anti-corruption Strategy Implementation*. Vienna: United Nations Publishing.

World Bank (2023a) *Governance Reform in Transitional States*. Washington, DC: World Bank Group.

World Bank (2023b) *Anti-corruption Frameworks: Global Evidence*. Washington, DC: World Bank Group.

World Bank (2023c) *Public Procurement Systems: International Best Practices*. Washington, DC: World Bank Group.

Zondo Commission (2022) *Judicial Commission of Inquiry into State Capture Report: Part 1*.
Pretoria: Government Printer.