



NACS IMPLEMENTATION PLAN AND MONITORING FRAMEWORK

HANDOVER REPORT JULY 2024



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1. PURPOSE OF THE DOCUMENT

Mthente Research and Consulting hereby submits this project closure and handover report to the GIZ and the Centre for Learning on Evaluation and Results (CLEAR-AA), which is now responsible for finalising the Monitoring and Evaluation (M&E) mechanisms for the National Anti-Corruption Strategy (NACS). The aim of the report is to provide an overview of activities, and capture learnings from the different cycles of the project. Mthente's role was to support the NACAC MERL Workstream with the revision of the NACS implementation framework and finalisation of the NACS implementation plan and its corresponding monitoring framework. Following the GIZ NACS alignment workshop held on the 14th of May 2024 with all relevant stakeholders, it is essential for Mthente to handover reports (attached in the appendix) which will form a basis for the next phase of the project. This report is composed of six concise sections and encompasses references to annexes for more comprehensive information.

2. BACKGROUND

The Transparency, Integrity and Accountability Programme (TIP) supports state and non-state actors to contribute towards the implementation of the National Anti-corruption Strategy (NACS) in a whole-of-government and societal manner. The TIP provides capacity development for anti-corruption actors in the state, civil society and the business sector. The project supports the implementation of the NACS in three areas:

- ❖ The first area promotes the active involvement of citizens, who contribute to the implementation of the NACS through initiatives that encourage transparency, integrity and accountability.
- ❖ The second area aims to strengthen institutional resilience so that the relevant state actors are empowered to steer the implementation of the NACS and coordinate processes themselves.
- ❖ The third area targets multi-stakeholder partnerships between the public sector, private sector and civil society to build up transparency, integrity and accountability.

The lead executing agency for the TIP is the Department of Planning, Monitoring and Evaluation (DPME). The TIP is implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ). The TIP is co-financed by the Swiss State Secretariat for Economic Affairs (SECO).

In line with the NACS, the President of the Republic of South Africa appointed the National Anti-Corruption Advisory Council (NACAC) in August 2022 with a maximum lifespan of 3 years. This transitional body is responsible for managing the initial matters of strategy implementation, including research, conceptual development and drafting of a proposal to Cabinet for the establishment of an overarching body for anti-corruption, the envisioned National Anti-Corruption Agency (NACA). The NACAC is supported by the NACAC Secretariat. One of the six workstreams of the NACAC focuses on Monitoring, Evaluation, Reporting and Learning (MERL). The TIP provides technical assistance to the NACAC and its Secretariat on its contribution towards an integrated M&E system for the implementation of the NACS and its impact. This support will focus on the revision of the NACS Implementation Framework and finalisation of the NACS implementation plan and its corresponding monitoring framework.

3. SCOPE

Mthente Research and Consultancy was entrusted with the revision of the NACS implementation framework and the development of the NACS implementation plan and its corresponding monitoring framework. This comprehensive strategy delineates strategic objectives aimed at fostering citizen participation, ethical leadership, professionalism, transparent governance, a culture of reporting, protection of vulnerable sectors, and the fortification of anti-corruption agencies. Acknowledging the imperative to coordinate anti-corruption endeavours, the strategy mandates the establishment of robust implementation structures and monitoring measures to holistically address corruption at multiple levels.

To operationalise the National Anti-Corruption Strategy's goals, there are six strategic pillars which include:

1. Promote and encourage active citizenry, whistleblowing, integrity, and transparency in all spheres of society.
2. Advance the professionalisation of employees to optimise their contribution to create corruption-free workplaces.
3. Enhance governance, oversight, and consequence management in organisations.
4. Improve the integrity and credibility of the public procurement system.
5. Strengthen the resourcing, coordination, transnational cooperation, performance, accountability, and independence of dedicated anti-corruption agencies.
6. Protect vulnerable sectors that are most prone to corruption and unethical practices with

effective risk management.

Since corruption is a complex phenomenon, it presents a formidable challenge in the development of an implementation framework, especially linear models of addressing change. Corruption, driven by multiple interconnected factors, often leads policymakers to address symptoms rather than root causes.

In order to provide assistance to the NACAC MERL Workstream with the revision of the NACS implementation framework and the finalisation of the NACS implementation plan along with its corresponding monitoring framework, Mthente's scope was informed by the terms of reference of the project, as well as guidance from the technical committee of the project and stakeholders during the course of execution. The table below explains the project activities and their status during the lifespan of the project:

Table 1: Overview of project scope and status of implementation

Tasks / Key deliverables	Status and reasons for variance (if any)
a. Familiarise with the NACS, its draft implementation framework, and relevant documents, including the Zondo Commission report and NACS reference group's internal documents. The NACAC workstream will provide necessary documents and contact information.	Completed. These documents provided a useful background to the project and the first draft framework was based on the NACS & the draft implementation framework. A workshop was held in September 2023 to discuss these first deliverables.
b. Provide project management support to the MERL workstream to update its work plan and define performance indicators.	Achieved. Throughout the cycle of the project, Mthente provided project management support as required. The process of indicators began with output indicators and the committee recommended the inclusion of outcome indicators. This was achieved and the draft indicators were circulated for comments.

Tasks / Key deliverables	Status and reasons for variance (if any)
<p>c. Clarify the requirements of the NACS implementation plan and monitoring framework, including mandates, ownership, and other related questions for different stakeholders.</p>	<p>Partially achieved. The first draft of the implementation plan included suggestions on the responsible stakeholders for specific outcomes of the plan and framework. However, the list was not exhaustive as this requires a broader consultation with stakeholders. It was later suggested by some of the workstream members that the focus for Mthente should be on getting the indicators right, and allow for a different process to inform who the responsible stakeholders should be.</p>
<p>d. Organise a workshop with the MERL workstream and relevant stakeholders to develop the NACS draft implementation framework. This includes assigning programmes, projects, and activities to appropriate entities and stakeholders.</p>	<p>Achieved. As mentioned earlier, this was held in September 2023. Suggestions from that workshop informed the revisions to the implementation plan. Further meetings also led to the decision that a literature review should be written to provide context to the 'state of corruption in South Africa and discussion on its preventive mechanisms'</p>

Tasks / Key deliverables	Status and reasons for variance (if any)
e. Draft a cross-sectoral and project-based implementation plan for the NACS, assigning roles and responsibilities from the government cluster to implementing entities.	Deferred. As stated under Task C, it was advised that the process of assigning roles and responsibilities from the government clusters needed more engagements to be held since establishing buy in is not an overnight process.
<p>f. Facilitate consultations with stakeholders as determined by the MERL workstream to:</p> <p>i. Validate the draft implementation plan.</p> <p>ii. Document relevant new and existing projects and activities in line with the draft implementation plan.</p> <p>iii. Develop performance monitoring indicators and collect data for FY 2021-2023 and projections for FY 2023-2024.</p>	Achieved partially. Mthente consultants attended several virtual meetings with specific members of the MERL to discuss their comments on the draft implementation plan/ framework at various stages. Although there were varied comments, efforts were made to incorporate the diverse views into the draft documents. Performance indicators were developed too for review by members.
g. Draft a cross-sectoral and impact-based performance monitoring framework for the NACS, including outputs, outcomes, and indicators to outline the results chain.	Achieved.

Tasks / Key deliverables	Status and reasons for variance (if any)
h. Open the draft implementation plan and performance monitoring framework for written feedback from stakeholders.	Achieved, although the majority of the feedback was verbal in the consultative meetings with MERL members, facilitated by GIZ.
i. Organise a consultative workshop with the MERL workstream and relevant stakeholders to receive and validate feedback on the draft documents.	Not achieved. This is mainly due to the nature of consultations with workstream members and stakeholders which was mostly one on one.
j. Consolidate feedback and finalise the NACS implementation plan and performance monitoring framework.	Achieved.
k. Draft an indicative NACS progress report for the period FY 2021-2023.	Not achieved.

Tasks / Key deliverables	Status and reasons for variance (if any)
l. Draft a plan guiding the operationalization of the implementation plan and performance monitoring framework, including recommendations on institutional arrangements, partnerships, and operational requirements. This plan should also include relevant tools such as a reporting and knowledge management framework and technical tools for performance data management.	Achieved.
m. Provide technical advice on the development of a digital tool to support ongoing collection, validation, and presentation of performance monitoring data for the NACS implementation plan	Maintained (See appendix 3)
n. A literature review on corruption in South Africa and approaches to monitoring and evaluating included in case studies of international example	Maintained (See appendix 1)
o. The development of a NACS M&E framework and the revision of the draft implementation plan	Maintained (See appendix 2 and 3)

Tasks / Key deliverables	Status and reasons for variance (if any)
p. A final report including an institutionalisation plan and advice on a digital tool for data collection	This report

4. NACS IMPLEMENTATION FRAMEWORK

The literature review ([Appendix One](#)) examined the extent of corruption, countermeasures, including frameworks and policies aimed at preventing corruption and holding those accountable, and how it is monitored in other countries. Furthermore, the review provided a benchmarking exercise against publicly available national anti-corruption strategies such as the Malawi National Anti-Corruption Strategy (NACS) and the Namibia National Anti-Corruption Strategy and Action Plan (NACSAP) to inform the outline of the design and layout of the National Anti-Corruption Strategy (NACS) monitoring framework.

Mthente conducted an assessment of the provided documentation and engaged stakeholders in a workshop to clarify expectations and discuss the framework's content and structure, including the subsequent monitoring framework. Discrepancies in expectations emerged, prompting a re-evaluation of the approach. It was observed that while the National Anti-Corruption Strategy outlines strategic pillars and key objectives, the detailed discussion for each pillar lacks the inclusion of corresponding key objectives. Additionally, the current monitoring approach combines information that should be separated into an implementation plan and a monitoring framework. Notably, the absence of well-developed indicators to guide implementation and measure success was identified as a critical gap.

The draft implementation framework ([Appendix Two](#)) addresses this gap by introducing indicators as a crucial aspect of monitoring and evaluation. The initial structure of the National Anti-Corruption Strategy, with its strategic objectives and pillars, poses challenges in tracking implementation. Consultations with stakeholders revealed the interconnection of strategic objectives across pillars, necessitating careful consideration in the development of an implementation plan and monitoring and evaluation (M&E) framework. Based on this need, Mthente embarked on a process of reviewing the outcomes and programme activities of the NACS and developed draft indicators that should be scrutinised by the stakeholders responsible for the implementation of certain programmes of the NACS. The framework will guide reporting on implementation using the indicators and will also contain information regarding baselines and targets, among others.

5. IMPLEMENTATION PLAN

Differences in expectations emerged, prompting a re-evaluation of the approach. It was observed that while the National Anti-Corruption Strategy outlines strategic pillars and key objectives, the detailed discussion for each pillar lacks corresponding key objectives. Additionally, the current monitoring approach combines information that should be separated into an implementation plan and a monitoring framework.

In response, Mthente reviewed the programme activities of the NACS and developed draft indicators which were then circulated to stakeholders for review. This review aimed to establish a fully-fledged implementation plan ([Appendix Three](#)), detailing how indicators will be tracked and monitored within the framework. The framework will guide reporting on implementation, incorporating information on baselines, targets, and a results chain to illustrate the logical flow from inputs to outcomes.

The draft framework presents potential indicators for each key activity, inviting stakeholders to evaluate their relevance and feasibility. This document facilitates stakeholder discussion on key indicators, considering their definition, importance, and relevance. Stakeholders will also identify data sources, reporting frequency, and responsible organisations for implementing the indicators. Inputs from stakeholders with specific content knowledge will help address gaps in the draft framework.

6. OPERATIONALISATION OF THE IMPLEMENTATION PLAN AND PERFORMANCE MONITORING FRAMEWORK

The operationalisation of the monitoring framework has been comprehensively understood and articulated by the NACAC in the advisory note submitted to the president concerning the implementation and rollout of the national anti-corruption strategy¹. Therefore, it is recommended that an emphasis be placed on the well-understood operationalization approach. To embed the National Anti-Corruption Strategy (NACS) within the government, the NACAC has proposed the following measures:

¹ NACAC (n.d.) Advisory Note to the President Regarding The Implementation And Roll-Out Of The National Anti-Corruption Strategy

- The whole-of-society approach to combating corruption has proven effective and should be strengthened. This approach relies on coordinated efforts across all levels of stakeholders, from local to provincial. While there is a good working relationship with provincial structures, it needs enhancement in various provinces.
- The nature of corruption is evolving, necessitating anti-corruption bodies to be flexible and responsive. The National Anti-Corruption Strategy (NACS) was developed to address gaps identified, but it needs continuous adaptation to current societal and criminal dynamics, exacerbated during events like the COVID-19 pandemic and recent disasters.
- There are perceived concerns about the lack of safe channels for reporting corruption, with whistleblowers facing victimisation and threats. As such, here's a critical need for new protective measures for whistleblowers.
- Adequate funding is crucial for sustainable anti-corruption efforts. Resources must be dedicated to implementation to ensure effectiveness.
- The political will is identified as pivotal for advancing anti-corruption initiatives, particularly in areas like procurement reform, whistleblower protection, and accountability of government structures.
- Improving the reporting mechanism for anti-corruption activities is essential for better coordination and tracking progress. A focus on gender and human rights should be integrated into the NACS implementation.
- Ongoing efforts are required to align various strategies and recommendations from initiatives like the Zondo Commission with the NACS objectives.
- Lastly, the National Anti-Corruption Advisory Council (NACAC) plays a vital role in overseeing NACS implementation. It should engage stakeholders urgently and conduct research to advise on redesigning South Africa's anti-corruption framework and enhancing whistleblower protection measures.

7. TECHNICAL ADVICE FOR DEVELOPING A DIGITAL PERFORMANCE MONITORING TOOL FOR NACS

Among the expected deliverables is the provision of technical advice on the development of a digital tool to support ongoing collection, validation, and presentation of performance monitoring data for the NACS implementation plan. From our understanding of this request, the digital tool would be expected to: (i) Facilitate real-time data collection and validation; (ii) Offer robust data

analysis and visualisation capabilities: Ensure secure and confidential handling of sensitive data; and (iii) Enable easy reporting and presentation of performance monitoring data.

The key requirements for this digital monitoring tool will be to;

- Identify key performance indicators (KPIs) to be tracked.
- Determine data sources and types (qualitative and quantitative).
- Establish user roles and permissions (e.g., data entry, validation, analysis).
- Define reporting and dashboard requirements.

With these requirements and functional requirements in mind, there will be a need for research into a suitable system with capabilities to carry them out. The system architecture would comprise a backend which uses cloud based infrastructure like Google Cloud, a frontend which uses a responsive web application that can be accessed on multiple devices. It will also have a database for structured data storage and management (e.g. MySQL).

As the project reaches finalisation and validation of important requirements such as indicators, the development of this digital tool for performance monitoring of the NACS implementation plan will become effective, ensuring robust data collection, validation, and presentation to support anti-corruption efforts in South Africa.

For the next service provider to effectively support the ongoing collection, validation, and presentation of performance monitoring data for the NACS implementation plan, several key considerations should be taken into account. Firstly, it is recommended to develop a user-friendly digital tool that accommodates for the strategic pillars and strategic objectives and key success measures of the NACS, ensuring that the data capture for both strategic and operational aspects (i.e., strategic indicators and intended outcomes) for each pillar, linked to corresponding programme.

Secondly, it is recommended that the tool separate the implementation plan from the monitoring framework, facilitating a more structured and organised approach to data management. It should include features for tracking draft indicators (or the finalised indicators²), enabling the relevant stakeholders, such as the MERL reference group, to review and evaluate relevance and feasibility continuously. Ideally, the digital tool should facilitate connections between the implementation plan and the monitoring framework for a holistic view. Additionally, the digital tool needs to have

² Please note, Mthente's contract approaches its conclusion, with the developed indicators presently in a draft stage.

ways to record past data (or baseline data), set new goals, and show the results chain so that it is easy to see how the NACS output and outcome indicators contribute to each specific programme.

Lastly, it is advised that the tool should be accessible for various stakeholders. It should support regular updates and feedback from stakeholders, allowing for frequent reporting.

8. LESSONS LEARNED

a. Lessons learned from desktop findings

A comprehensive approach to strengthening South Africa's anti-corruption strategy can be achieved through the incorporation of successful elements from similar initiatives undertaken by Malawi and Namibia, as detailed within the provided literature review ([Appendix One](#)). This would involve the following key measures:

- ❖ Similar to Malawi and Namibia's multi-stakeholder approach, South Africa can encourage wider participation from all sectors (government, business, civil society) in developing and implementing the strategy.
- ❖ Following Malawi's lead, South Africa can establish a more robust monitoring and evaluation framework. This could include regular self-evaluations and peer reviews among different sectors to promote accountability, knowledge sharing, and continuous improvement.
- ❖ Taking a cue from Namibia, South Africa can adopt a system for regularly reviewing and updating the strategy. This ensures alignment with evolving national priorities and emerging challenges.
- ❖ Assigning specific tasks and responsibilities to each reference group will enhance ownership and effectiveness in achieving the anti-corruption goals.

This, coupled with continued political will, adequate funding could empower South Africa to enable South Africa to efficiently enforce the NACS to combat corruption and move closer to the National Development Plan's vision of a corruption-free society.

b. Lessons learned and recommendations for further work

- ❖ The TIP, as the custodian of evaluation, with its primary role being the coordination of government planning, monitoring, and evaluation, should be integrally involved in the

planning, conceptualization, and coordination of the operationalisation of the NACS implementation plan and performance monitoring framework. This involvement should include the provision of recommendations on institutional arrangements, partnerships, and operational requirements.

- ❖ The literature review (including the advisory note submitted to the president concerning the implementation and rollout of the national anti-corruption strategy) emphasised multi-stakeholder approaches. A service provider could encourage wider participation from all sectors (government, business and civil society) in developing and implementing the anti-corruption strategy.
- ❖ The framework developed by Mthente is currently in the draft phase. To advance its development, the next evaluation phase should delineate specific tasks and responsibilities to enhance ownership and effectiveness. As such, a service provider could be appointed to play a crucial role in this process by defining and communicating the roles and responsibilities of each stakeholder group involved in the NACS implementation.
- ❖ Mthente has refined the monitoring framework by developing potential indicators for each key activity of NACS. Future engagements should validate these indicators to guide implementation and measure success.
- ❖ The evolving nature of corruption necessitates flexible anti-corruption measures. Consequently, the reference group and TIP should continuously adapt the NACS to address emerging challenges.

Appendix One: Literature Review

1. Introduction

High levels of corruption were highlighted as one of the nine primary challenges impacting South Africa in the National Planning Commission's 2011 Diagnostic Report. Despite the passage of time, high levels of corruption persist and remain a focal point in public discourse, standing out among the country's wicked problems. According to the National Development Plan (NDP), corruption refers to "the misuse of an official position for personal gain," be it in the public or private sectors (National Planning Commission, 2012, p. 446). The ways in which corruption negatively affects the nation are also outlined in the NDP in several ways. Firstly, corrupt practices disproportionately burden the poor, as they undermine the quality and accessibility of public services. Secondly, the accountability mechanisms within state systems have exhibited inconsistencies, allowing corruption to flourish unchecked. Lastly, corruption is not confined solely to the public sector; it permeates broader societal structures, indicating a pervasive societal 'disease' that necessitates comprehensive addressing (Ibid p446). In order to overcome corruption and the lack of accountability, there is a need for using a comprehensive approach that fosters "political will, sound institutions, a solid legal foundation and an active citizenry that holds public officials accountable" (Ibid p446).

About 13 years after the launch of the NDP, one of its aspirations to achieve a zero tolerance for corruption seems to be waning away. One of the notable strides has been the launch of the National Anti-Corruption Advisory Council (NACAC) – a multi-sectoral advisory body appointed by President Ramaphosa in August 2022 to oversee the implementation of the National Anti-Corruption Strategy (NACS) and to advise on the future of the country's anti-corruption institutional architecture. Its roles also include reviewing the anti-corruption policies and instruments in place as well as an analysis of the progress and effects of their implementation. Despite considerable efforts and achievements, there remains a widespread perception that the South African government is not sufficiently contributing to the fight against corruption. It is thus important to analyse and narrate the progress to acknowledge the efforts of the involved entities and to foster the motivation of others to participate.

This review of literature analyses corruption in terms of magnitude, countermeasures and examples of approaches used to monitor corruption in other jurisdictions, from which South Africa can learn. The purpose of this concise literature review is to provide contextual background on corruption, its drivers, legislative and policy frameworks and provide recommendations for the creation of the NACS implementation plan and monitoring framework. The opening section provides an assessment of the extent of corruption in the country, drawing on international indicators. Chapter 2 discusses the shortcomings of these indexes and the difficulty in quantifying corruption. Chapter 3 of the second section presents a comprehensive analysis of both international and national strategies implemented to combat corruption in South Africa. Chapter 4 examines the monitoring and evaluation procedures that are in place to supervise the implementation of the stated policies and assess their overall efficacy and impact. The authors examine the difficulties in assessing the efficacy of anti-corruption policies and provide case studies from different nations in Chapter 5. The concluding chapter provides a concise summary

of the main findings from the literature study and finishes by offering recommendations for the monitoring and evaluation of anti-corruption initiatives in South Africa.

The sources of evidence for this literature review include policies, scholarly articles, government reports, and other relevant sources.

2. (Measuring) corruption in South Africa

On a global scale, the need to research corruption to understand its drivers, magnitude, traits, and combating mechanisms has led to a plethora of studies, indicators and indices by scholars and various organisations. Each of these possesses its strengths and weaknesses, particularly in providing a comprehensive understanding of corruption prevalence. When focusing on indicators and indices, it becomes crucial to scrutinise those that extend beyond mere reporting of corruption incidents or perceptions. In this section, emphasis is placed on credible and widely acknowledged indices and forecasts. Among them is the Corruption Risk Forecast, which examines the underlying social, legal, and institutional factors that either foster or impede corrupt practices. This framework integrates assessments of both "de facto" (in practice) and "de jure" (in law) institutional transparency and integrity. Transparency International offers similar evaluative tools with its National Integrity Assessment framework, providing valuable guidance for developing corruption assessment methodologies. Such guidance is pivotal in accurately gauging the depth of corruption and corruption risk within South Africa. Additionally, it is beneficial to consider Transparency International's insights on the potential limitations of "integrity-led" anti-corruption programmes, as several such initiatives are featured in the National Anti-Corruption Strategy (NACS).

2.1. The extent and nature of corruption in South Africa

In his lecture at the National School of Government (February 2024), Prof. Christopher E. Stone states that corruption involves the use of public power for personal purposes and that it can be achieved through legal or illegal means. However, proving corruption in court can be challenging, especially when no specific action can be directly linked to a particular benefit. Corruption can sometimes be justified as 'noble cause' corruption, where public power is misused for the perceived public interest. The motivations for engaging in corruption and the experiences of those involved can be highly complex, underscoring the importance of understanding these contextual factors to develop effective anti-corruption strategies. In the same lecture, he cites examples from Nigeria and Mexico, where police corruption is prevalent, showcasing the systematic nature of corruption and the difficulties in dismantling it.³ Corruption results in a lack of public confidence in democratic processes, it entrenches elites, slows economic growth, and deepens economic inequality as money continues to trickle up (van Vuuren, 2004).

³ Stone, C.E. Public Corruption Turnarounds: Replacing a Legacy of Corruption with a new Culture of Integrity. The National School of Government Masterclass. Streamed Live on 22 Feb 2024. YouTube Video : <https://www.youtube.com/watch?v=kSExrssFAfU> (Accessed 26 February 2024)

According to Transparency International's 2023 Corruption Perceptions Index, South Africa scored 41 on a scale of 0–100, where 0 means "highly corrupt" and 100 means "very clean". In the index, South Africa ranked 83rd among 180 countries⁴. As reported by Corruption Watch, corruption and the perception of corruption in South Africa have significantly harmed the country's reputation, creating barriers to local and foreign direct investment, capital flows to the stock market, global competitiveness, and economic growth. Ultimately, this has hindered the development and upliftment of the population. Corruption and bad management practices eat into the nation's wealth, channelling money away from such projects and the very people most dependent on the government for support (Corruption Watch, n.d.)

The Corruption Perception Index

South Africa is amongst the nations evaluated by Transparency International's Corruption Perception Index (CPI), which assesses the prevalence of corruption in various countries. The CPI employs a scale ranging from 0 to 100, where 0 signifies an extremely high level of corruption and 100 denotes a very low level of corruption. Additionally, the index ranks countries from 1 to the last position (determined by the number of countries assessed in a given year), with the lowest rank indicating the least corrupt country. In 2023, South Africa obtained a score of 41 out of 100, reflecting a decline of 2 points compared to its CPI score of 43 in 2022⁵.

The National School of Government (2024) however, notes a significant public misperception regarding South Africa's recent decline in the Corruption Perception Index (CPI) from a score of 43 to 41. While this drop could be interpreted as a general indicator of worsening corruption, the CPI is fundamentally a measure of perception rather than quantifiable instances of corruption. Crucially, it aggregates the perceptions of business elites, not the general public. The CPI score is an average of multiple surveys, and the 2023 downturn can be largely attributed to a decline in business leader perception as measured by a single survey.⁶

The National School of Government (2024) therefore emphasises the importance of critical analysis when interpreting CPI headlines. Oversimplified conclusions about endemic corruption must be avoided, as they can obscure the complex factors that shape the index's results.⁷

The Governance Indicators

Concerning the World Bank's governance indicators, South Africa is ranked 44.81⁸ with an index of -0.32 (+2.5 is the maximum value) (World Bank Group, 2023). This index indicates that the country's performance is lacking, as the index exhibits negative values and poor rankings. The World Bank's indicators are among the most widely recognised variables for measuring good governance. Encompassing six governance indicators, one of which is control of corruption, the WGI seeks to assess the perceived levels of corruption within a country's public sector. The WGI

⁴ <https://www.transparency.org/en/cpi/2023>

⁵ Stone, C.E. Public Corruption Turnarounds: Replacing a Legacy of Corruption with a new Culture of Integrity. The National School of Government Masterclass. Streamed Live on 22 Feb 2024. YouTube Video : <https://www.youtube.com/watch?v=kSExrssFAfU> (Accessed 26 February 2024)

⁶ Ibid

⁷ Ibid

⁸ Percentile rank among all countries (ranges from 0 (lowest) to 100 (highest) rank)

employs a set of six indicators to gauge governance, with the indexes for the various variables ranging from -2.5 to +2.5 (Meyer, 2022).

The Corruption Risk Forecast

Corruption Risk Forecast (CRF) is a corruption analysis tool that uses facts instead of perceptions. It's based on a collection of public data and provides three dashboards to show the state of corruption globally. According to the Corruption Risk Forecast (CRF) South Africa's Corruption Forecast is stationary. South Africa has made progress in e-citizenship and online services, leading in fiscal and administrative transparency. However, land cadastres, mining concessions, international aid, building permits, and public officials' assets and conflicts of interest are only partially accessible online. The government operates informally and without public fiscal tracking, reducing transparency. South Africa needs a Brazil-like system where the general auditor publishes reports on all government units to prevent corruption at the administrative stage. Despite the good quality of anti-corruption organisations, final impunity tests have not yet been passed.⁹

Table 1: South Africa's Corruption Forecast

Components	2013	2023	
Budget Transparency	9.36	10	
Judicial Independence	7.44	6.92	
Press Freedom	7.79	8.07	
E-Citizenship	3.23	4.4	
Online Services	5.12	7.74	

Keys

	change not statically significant
	negative change
	positive change

The Public Integrity Index

South Africa's Index of Public Integrity (IPI) is a composite index that measures a country's ability to control corruption. The IPI is based on six components that are an equilibrium between opportunities for corruption and society's ability to constrain corrupt behaviour: Judicial independence, administrative burden, trade openness, budget transparency, e-citizenship, freedom of the press. According to Corruption Risk, South Africa's IPI score is 7.51 out of 10. The IPI score is the mean of the six components scores, which result from the standardisation and

⁹ <https://www.corruptionrisk.org/country/?country=ZAF#forecast>

normalisation of original source data to range between 1 and 10 using a min-max-transformation, with higher values representing better performance¹⁰.

Table 2: South Africa's Index of Public Integrity (IPI)

Components	Component Score (max=10)	World Rank	Income Group Rank	Regional Rank
Opportunities for Corruption				
Administrative Transparency	7.75	3/119	3/40	1/31
Online Services	7.05	45/119	12/40	2/31
Budget Transparency	10	1/119	1/40	1/31
Constraints on Corruption				
Judicial Independence	7.26	21/119	3/40	3/31
Freedom of the Press	7.89	21/119	3/40	2/31
E-Citizenship	5.09	70/119	28/40	2/31

The Transparency Index

Lastly, the Transparency Index (T-index) is a measure of government transparency in South Africa. It considers both de facto and de jure aspects of transparency. De facto transparency refers to the availability of public information online, while de jure transparency refers to the signing of treaties and the implementation of laws. According to Corruption Risk, the South African T-Index Score is 15/20, indicating a moderate level of government transparency. While this score reflects some progress in recent years, there is still room for improvement.¹¹

Table 3: South Africa's Transparency Index (T-index)

	Regional Average	South Africa	World	Income Group Average
De Facto Transparency	4.98	9	7.5	9.19
De Jure Transparency	4.37	6	4.63	4.37

¹⁰ <https://www.corruptionrisk.org/country/?country=ZAF#integrity>

¹¹ <https://www.corruptionrisk.org/country/?country=ZAF#transparency>

2.2 Limitations of “integrity-led” anti-corruption interventions

A paper by Jenkins (2022) examined the effectiveness of integrity-led interventions in reducing corruption. The findings suggest that while integrity-oriented approaches alone do not yield substantial results, certain interventions like ethical leadership, behavioural nudging, and anti-corruption messaging can contribute to corruption reduction in specific contexts. The most effective approaches combine making corruption costly with promoting ethical behaviour (Ibid). Integrity measures can complement, but not replace, direct anti-corruption efforts; they are unlikely to be successful as standalone strategies¹².

In sum, while South Africa scores poorly on international corruption perception indices, such as the CPI, IPI and T-index, indicating a widespread belief that corruption is a problem, there are limits to what these perceptions actually entail, for instance as pointed out by Jenkins (2022), the measures of corruption/integrity measures are insignificant if they do not promote ethical behaviour. In the South Africa context there are signs of resilience against corruption. As outlined in the National Anti-Corruption Strategy (NACS), the Republic of South Africa possesses a robust constitutional and legislative framework for law enforcement, composed of multiple agencies designated to combat corruption and a range of regulatory or oversight bodies established to prevent and mitigate its prevalence (NACS, 2020-2023, p. 38). Furthermore, independent media organisations such as Corruption Watch actively challenge instances of corrupt practices. Additionally, the establishment of [The Zondo Commission on State Capture](#), tasked with investigating allegations of state capture, and proposals for the creation of a new anti-corruption agency demonstrate a commitment to addressing the issue of corruption. Lastly, the pursuit of [international cooperation](#) with other countries in combating crime, which is often linked to corruption, through recent initiatives provides a glimmer of hope for progress in this domain. The NACS 2020-2030 (p.38), however notes that efforts to create a well-regulated public sector and fast-track corruption cases in South Africa have not been fully successful as many implicated in corrupt activities remain unpunished. Challenges with the current multi-agency approach, some deliberately created or exacerbated by individuals seeking to weaken these entities, hinder progress. However, there is a renewed commitment within key law-enforcement agencies to root out unethical practices and ensure the detection, arrest, and conviction of perpetrators. Concerted efforts are required to strengthen the country's anti-corruption law-enforcement capacity and provide adequate resources for mandated agencies to effectively execute their functions.

2.3 The Zondo Commission on State Capture

The Zondo Commission, also referred to as the State Capture Commission, is a public inquiry initiated in January 2018 by former President Jacob Zuma. Its purpose is to investigate allegations of state capture, corruption, and fraud within the public sector and various governmental bodies in South Africa. The following poignant statement made in the conclusion of the report shows the depth of corruption in South Africa: “Corruption has strengthened its hold and extended its hold on public procurement over a very long period. Clearly, a new approach is required; it cannot be

¹² Jenkins, M (2022). The effectiveness of integrity-led anti-corruption interventions. Retrieved 27 February 2024 from <https://knowledgehub.transparency.org/helpdesk/the-effectiveness-of-integrity-led-anti-corruption-interventions>

the same mixture as before” (James, 2022). The Presidency has submitted details to NACAC on the implementation of “actions contained in the President’s response to the Judicial Commission of Enquiry into allegations of state capture, corruption and fraud in the Public Sector”¹³. In sum, the key recommendations are the following:

- i. The publication of a national charter against corruption
- ii. The strengthening of protection for whistle-blowers and allowing them to financially benefit from disclosures
- iii. The creation of an anti-corruption agency dealing with public procurement
- iv. The deferral of prosecution of corporations if they cooperate fully and pay a fine
- v. The creation of a professional body for procurement officers
- vi. The enhancement of transparency in public procurement
- vii. The strengthening of protection for accounting officers or authorities acting in good faith.
- viii. The strengthening of the Prevention and Combating of Corruption Activities Act (PRECCA)
- ix. The criminalising of making donations to political parties in exchange for a tender
- x. The introduction of stronger and more specific legislation relating to public procurement.¹⁴

The Executive and Parliament were tasked with implementing the Zondo Commission's extensive reform recommendations to prevent corruption and state capture. A recent study by the Human Sciences Research Council, in collaboration with several institutional partners, has revealed that implementation of these recommendations has been uneven. While both the Government and Parliament published response plans in October and November 2022, the government's response contained some timeframes and promised regular progress reports, but Parliament's contained neither (Pienaar and Bohler-Muhler 2023 p1).

2.4 Sectors most affected by corruption and its socioeconomic implications

Corruption disproportionately harms impoverished and vulnerable populations, leading to increased financial burdens and diminished access to essential services, including healthcare, education, social programs, and even justice. Moreover, it exacerbates inequalities and deters private-sector investment, which has detrimental effects on markets, employment opportunities, and economic growth (World Bank Group, 2023a).

According to a report by KPMG (2016), The presence of corruption within the public sector exerts a significant influence on the institutions of a country, manifesting through both direct and indirect consequences. Direct costs associated with corruption encompass not only bribery but also the misallocation of funds resulting from inflated procurement contract prices and the theft of public assets. The indirect costs, on the other hand, include inefficiencies stemming from the deterioration of institutions and the prevalence of criminal activities. Furthermore, corruption has implications for social welfare, impacting the distribution of income and assets, unemployment rates, and environmental conditions, and public health. Additionally, a culture of corruption

¹³ The Presidency (a). (n.d.) The State Capture Inquiry. State of the Nation. <https://www.stateofthenation.gov.za/priorities/fighting-corruption/the-state-capture-inquiry>

¹⁴ Ibid

undermines the rule of law by weakening the institutions responsible for enforcing a country's legal framework (KPMG, 2016).

The National Anti-Corruption Strategy (NACS) places significant emphasis on protecting vulnerable sectors within South Africa that are disproportionately prone to corruption. The strategy outlines targeted interventions aimed at reducing unethical practices and corrupt activities in these sectors. For instance, one of the pillars of NACS (Pillar 6 - Protection of Vulnerable Sectors) focuses exclusively on protecting vulnerable sectors that are most prone to corruption and unethical practices with effective risk management. NACS focuses to continuously identify high-risk areas within both the public and private sectors. The ultimate goal is to create multi-stakeholder collaboration to enhance integrity, transparency, and accountability, particularly in sectors where citizens interact with those in positions of power, or where the government exercises control over valuable resources or processes.

3. Legislation and Policy Frameworks

There are several local and international frameworks, conventions, legislative acts and policies that form the framework for preventing corruption, and holding accountable those who commit corrupt acts.

3.1. International Anti-Corruption Conventions and Frameworks

Below is a list of international conventions and frameworks that govern anti-corruption efforts across the globe. It is not exhaustive but provides an indication of what instruments exist in this regard:

- **The United Nations Convention against Corruption (UNCAC):** The UN Convention against Corruption promotes prevention, criminalization, and asset recovery for corruption. It establishes preventive measures and provides a framework for international cooperation¹⁵.
- **The Organisation for Economic Cooperation and Development (OECD) Convention:** Criminalizes bribery of foreign officials in international business, promoting transparency and accountability¹⁶.
- **African Union Convention on Preventing and Combating Corruption:** Aims to eradicate corruption in Africa by coordinating policies and legislation, including measures for prevention, detection, and punishment¹⁷.

¹⁵ UNCAC. (n.d.). Stolen Asset Recovery Initiative (StAR). Retrieved October 6, 2023, from <https://star.worldbank.org/focus-area/uncac>

¹⁶ Convention on combating bribery of foreign public officials in international business transactions. (n.d.). OECD. Retrieved October 6, 2023, from <https://www.oecd.org/corruption/oecdantibriberyconvention.htm>

¹⁷ African Union Convention on Preventing and Combating Corruption (2003). Client Earth. Retrieved October 7th, 2023 from <https://www.clientearth.org/latest/documents/african-union-convention-on-preventing-and-combating-corruption/#:~:text=PDF%20%7C%20159%20kb-,African%20Union%20Convention%20on%20Preventing%20and%20Combating%20Corruption,the%20public%20and%20private%20sectors.>

- **SADC Protocol Against Corruption:** Extends anti-corruption measures to the private sector, emphasising asset confiscation and legal assistance¹⁸.
- **The Financial Action Task Force (FATF):** Focuses on combating money laundering, including terrorist funding, through global standards and monitoring¹⁹.
- **G20 Anti-Corruption Working Group:** Monitors integrity, transparency, and asset recovery, guiding G20 leaders²⁰.

3.2. National policy and legislation in South Africa's public sector

The Constitution serves as the overarching framework that guides all aspects of governance. While explicitly mandating ethical leadership, the Constitution also establishes stringent criteria for public procurement practices, ensuring transparency, integrity, and accountability in government operations. section 27(1) of the Constitution of the Republic of South Africa states: ***“When an organ of state in the national, provincial or local sphere of government, or any other institution identified in national legislation, contracts for goods or services it must do so by a system which is fair, equitable, transparent, competitive, and cost-effective.”*** (Constitution of the Republic of South Africa). This is meant to emphasise the importance of the Constitution and ethical leadership in South Africa and serves as a reminder that all South Africans have the right to hold their government accountable for the way it spends public money.

The South African government has implemented various anti-corruption strategies and enacted relevant legislation to combat corruption effectively. These measures aim to foster transparency, accountability, and integrity in both the public and private sectors. These anti-corruption strategies and legislations in South Africa demonstrate the government's commitment to combating corruption and promoting ethical governance. By fostering transparency, accountability, and integrity, these measures aim to create a more just and equitable society. The Medium-Term Strategic Framework (MTSF) emphasises leadership and ethical behaviour, aiming to improve the country's ranking on Transparency International's Corruption Perception Index and enhance the criminal justice system²¹. The Public Service Anti-Corruption Strategy (PSACS) focuses on integrated and holistic anti-corruption measures, successfully bolstering anti-corruption legislation and developing public sector policies and guidelines²². The Local Government Anti-Corruption Strategy (LGACS) promotes community ownership, strengthens municipalities against corruption, and builds trust through effective investigation and resolution²³. The National Anti-Corruption

¹⁸ SADC Protocol Against Corruption (2001). Transparency.org. Retrieved 7th October, 2023 from <https://knowledgehub.transparency.org/guide/international-anti-corruption-commitments/8167#:~:text=Brief%20description,the%20public%20and%20private%20sector.>

¹⁹ FATF: What we do (n.d.) FATF. Retrieved 7th October, 2023 from <https://www.fatf-gafi.org/en/the-fatf/what-we-do.html>

²⁰ G20 Anti-Corruption Resources (n.d.) UN Office on Drugs and Crime. Retrieved 7th October, 2023 from <https://www.unodc.org/unodc/en/corruption/g20-anti-corruption-resources/by-thematic-area.html>

²¹ NACS 2020-2030, p19.

²² Parliamentary Monitoring Group (PMG). (n.d.). Public Service Anti Corruption Strategy: summary of proposals. Retrieved 16 October 2023 from <https://static.pmg.org.za/docs/2003/appendices/summaryfr.htm>

²³ Holden, P. (November 2023). Zondo at your Fingertips

Strategy (NACS) which serves as a framework that guides ministries, departments, agencies, and local governments in formulating and implementing anti-corruption action plans.

According to the Presidency of the Republic of South Africa (2023), as of November 2023, the President's response plan to combat corruption encompassed sixteen legislative amendments or new statutes. These initiatives aim to address vulnerabilities identified within the South African system. Nine bills have been introduced to parliament, and two have been successfully enacted into law. The most recent additions to the legislative pipeline include the National Prosecuting Authority Amendment Bill (B29-2023) and the Companies Second Amendment Bill. Introduced in September and August 2023 respectively, these bills respectively establish a permanent anti-corruption investigating directorate within the National Prosecuting Authority and extend the period for disbarring delinquent company directors, as recommended by the State Capture Commission. The broader legislative agenda encompasses a range of reforms, targeting areas such as public procurement, national intelligence, anti-corruption measures, money laundering prevention, electoral reform, and professionalisation of the public service ²⁴.

In addition to the policy frameworks identified above, other existing legislation that can contribute to the fight against corruption includes:

- Prevention and Combating of Corrupt Activities Act (PRECCA), Act 12 of 2004 - criminalises acts of corruption and bribery, places onus of reporting on any person who holds the position of authority, if they don't, they are liable.²⁵
- Promotion of Access to Information Act (PAIA), Act 2 of 2000 - "enables everyone to be able to access the information they need to exercise or protect their constitutional rights,"²⁶ This means anti-corruption individuals or organisations can ask for relevant information from both public and private bodies.
- Promotion of Administrative Justice Act (PAJA), Act 3 of 2000 - emphasises principles such as openness, transparency and accountability of the public service to protect citizens from being treated unfairly.²⁷
- Protected Disclosures Act (PDA), Act 26 of 2004 - provides procedures for whistle-blowing as well as legal protection against reprisal.²⁸
- Public Finance Management Act (PFMA), Act No 1 of 1999 (used most often in the Zondo commission). Establishes 2 legal entities with duties: a) 'accounting officer' (person in government department responsible for making and administering procurement system

²⁴ The Presidency Republic of South Africa (2023) The Tide Is Turning: Progress Report on Implementation of President Ramaphosa's Response to the Judicial State Capture Commission. Retrieved 27 February 2024 from https://www.stateofthenation.gov.za/assets/downloads/State_Capture_Progress_Report_November_2023.pdf

²⁵ Holden, P. (2023). Zondo at your Fingertips.

²⁶ Corruption Watch. (n.d.). Our Recent PAIA request. *Corruption Watch*, retrieved 16th October 2023 from <https://www.corruptionwatch.org.za/learn-about-corruption/reports/our-recent-paia-requests/>

²⁷ The Public Service Commission. (n.d.). *Compliance with the Promotion of Administrative Justice Act 2000 (Act No.3 of 2000)*. The Public Service Commission. Pretoria.

²⁸ Department of Justice. (n.d.). Protected Disclosures Act, 2000 (Act 26 of 2000). Retrieved 16th October 2023 from https://www.justice.gov.za/legislation/acts/act_docs/2001_draft_protdisclosure%20guide.html#:~:text=The%20purpose%20of%20the%20Protected,her%20employer%20or%20fellow%20employees.

and that rules are followed, usually head of government department) and b) accounting authority (mostly board of an entity have fiduciary duties & must be fair. If you're unfair, fruitless or wasteful there are statutory crimes or offences.²⁹

- Municipal Finance Management Act (MFMA), Act no 56 of 2003 - clarifies roles of local government officials, ensures a sound financial governance framework at the municipal level, and maximises the capacity of municipalities to deliver services.³⁰
- Public Audit Act, Act 25 of 2005 - provides the legislative framework for reporting material irregularities identified during the auditing process as well as actions taken to remedy these, and what to do if the actions were not appropriate.
- Financial Intelligence Centre Act (FICA), Act 38 of 2001 - the legislative framework for the Financial Intelligence Centre (FIC) to investigate financial flows relating to racketeering, money laundering, potential terrorism and corruption.³¹
- Prevention of Organised Crime Act, Act 121 of 1998 - includes legislation on racketeering and money laundering that can be applied in corruption cases with severe penalties, liable for suspecting and not curbing criminal activity.³²

Chapter 14 of the National Development Plan (NDP):

The NDP was released in 2012 after extensive research into the development issues facing South Africa. Incorporated in the vision for a 'thriving' country across many dimensions was an emphasis on, including values-based and anti-corruption ethics as part of professional public service as part of the fostering of the dignity of citizens, and poverty elimination and inequality reduction by 2030.³³ Corruption is identified as one of the potential pitfalls for achieving the NDP's aims, and as part of the ethos, the plan identifies that "An open society, transparency, disclosures and a culture of accountability"³⁴ will be necessary to make a change. Specifically a critical action identified is to: "professionalise the public service, strengthen accountability, improve coordination and prosecute corruption."³⁵ This emphasis on good governance found particular Chapter 14 of South Africa's National Development Plan (NDP) envisions a 2030 free from corruption, achieved through an empowered citizenry, ethical leadership, and a robust anti-corruption system. This future hinges on a multi-pronged approach. According to the NDP), the vision for 2030 is zero tolerance for corruption. ***"In 2030, South Africa will be a society in which citizens do not offer bribes and have the confidence and knowledge to hold public and private officials to account, and in which leaders have integrity and high ethical standards. Anti-corruption agencies should have the resources, independence from political influence, and powers to investigate corruption, and their investigations should be acted upon."*** (National

²⁹ Holden, 2023.

³⁰ National Treasury (n.d.) MFMA. National Treasury. Retrieved 16th October 2023 from <http://mfma.treasury.gov.za/Pages/Default.aspx>

³¹ FIC. (n.d.). Legislation. Retrieved 16th October 2023 from <https://www.fic.gov.za/Resources/Pages/Legislation.aspx>

³² Holden, 2023.

³³ National Planning Commission, 2013. National development plan vision 2030.

³⁴ National Planning Commission, 2013. National Development Plan Vision 2030. National Planning Commission (2013). Our future - make it work: National Development Plan 2030 - Executive Summary. , p17.

³⁵ Ibid, p24.

Planning Commission, n.d., p. 447). The commission has identified key areas where policy changes should be implemented to create an accountable state and achieve zero tolerance for corruption. These areas are: (i) Strengthening the multi-agency anti-corruption system; (ii) Strengthen protection of whistle-blowers; (iii) Centralise the awarding of large tenders or tenders with long duration; (iv) Give greater teeth to the tender compliance monitoring office to investigate both corruption and the value for money aspect of tenders; (v) Strengthening Judicial Governance and the Rule of Law: reforming the judicial governance system to ensure the independence and accountability of the judiciary, improve the quality of judges, and increase access to justice for the poor.

(i) *Strengthening the multi-agency anti-corruption system.*

- ❖ An anti-corruption system needs to be free from political interference. According to the NDP, the ***“institutional independence of anti-corruption agencies is contentious, since they are all accountable to the Executive”*** (National Planning Commission, n.d., p. 448).
- ❖ Designated entities need to have the capability and resources, including increased funding and specialised teams. Designated anti-corruption agencies include the South African Police Service, the Special Investigations Unit, the Assets Forfeiture Unit, and the Public Service Commission. The Public Protector and the Auditor-General also investigate corruption. The NDP recommends sharing and coordination, as well as distinct and separate functions to reduce duplication (National Science and Technology Forum, n.d.).
- ❖ Leaders need to take action. This means political will and support for anti-corruption agencies. According to the NDP, political will refers to ***“more than public statements of support, and includes a commitment to acting on that support by providing sufficient resources and taking action against corrupt officials”*** (National Planning Commission, 2013, p. 404).

(ii) *Strengthen the protection of whistle-blowers to create a culture of disclosure of wrongdoing*

- ❖ According to the NDP, the protection of whistle-blowers is essential to create a culture of disclosure of wrongdoing. ***“While the Protection of Disclosure Act (2000) provides some protection for whistle-blowers, it does not do Enough”*** (National Planning Commission, n.d., p. 404)
- ❖ The Protected Disclosures Act (2000) needs to be reviewed and then the government departments need to develop policies to implement the act. The act doesn’t provide enough protection, including inadequate security and confidentiality for whistle-blowers (National Science and Technology Forum, n.d.). The NDP notes several weaknesses that need to be addressed i.e., there is ***“no public body tasked with providing advice and promoting public awareness, and no public body dedicated to monitoring whistleblowing; the possibility of conditional amnesty for whistle-blowers implicated in corruption is not clear; adequate security for whistleblowers has not been established; the scope of protection in law is too narrow; and the range of***

bodies to which a protected disclosure may be made is too narrow” (National Planning Commission, 2013, p. 405).

- ❖ In response to these gaps, the NDP recommended, the ***“expansion of the scope of whistle-blower protection under the Protected Disclosures Act, to include those outside the traditional employer-employee relationship and permit disclosure to bodies other than the Public Protector and the Auditor-General and strength measures to ensure the security of whistle-blowers”*** (National Planning Commission, 2013, p. 405).

(iii) *Centralise the awarding of large tenders or tenders with long duration*

- ❖ The NDP proposed a review and reform of the procurement procedures, including legal reforms to simplify procurement. Furthermore, the NDP proposed that beyond designing cost-effective procurement systems that enable effective government, there should be a tiered system to review tenders depending on their value. This would include differentiated safeguards and procedures (National Science and Technology Forum, n.d).

(iv) *Give greater teeth to the tender compliance monitoring office to investigate both corruption and the value for money aspect of tenders*

- ❖ According to the NDP, the Office of the Accountant General in the National Treasury is responsible for promoting and enforcing the effective management of revenue and expenditure in departments, as well as monitoring the proper implementation of public sector financial management acts. This includes setting and monitoring procurement practices. The NDP proposes including value for money as part of this (National Planning Commission, 2013, p. 406).

Strengthening the multi-agency anti-corruption system entails ensuring institutional independence free from political interference, as highlighted by the National Development Plan (NDP), which underscores the need for anti-corruption agencies to operate autonomously from the Executive. Essential to this endeavour is equipping designated entities such as the South African Police Service, the Special Investigations Unit, the Assets Forfeiture Unit, the Public Service Commission, the Public Protector, and the Auditor-General with adequate capability, resources, and specialised teams, including increased funding, to effectively combat corruption. The NDP emphasises the importance of coordination among these agencies while advocating for distinct and separate functions to mitigate duplication. Furthermore, effective leadership is crucial, requiring not only political will but tangible support for anti-corruption efforts, as articulated by the NDP's definition of political will as more than mere lip service but a commitment to providing ample resources and taking decisive action against corrupt individuals.

To ***strengthen the protection of whistleblowers and foster a culture of disclosing wrongdoing***, the National Development Plan (NDP) emphasises the imperative of enhancing existing legislative frameworks. Despite the Protection of Disclosure Act (2000) offering some safeguards for whistleblowers, the NDP highlights its insufficiency, advocating for a comprehensive review. Presently, government departments must develop policies to effectively implement the act, addressing its shortcomings, particularly regarding inadequate security and

confidentiality provisions for whistleblowers. Identified weaknesses in the current framework include the absence of dedicated public bodies for providing advice, raising public awareness, and monitoring whistleblowing activities. Additionally, the NDP underscores the ambiguity surrounding conditional amnesty for whistleblowers implicated in corruption cases, insufficient security measures, and a narrow scope of protection under the law. To address these gaps, the NDP recommends expanding the Protected Disclosures Act's scope to cover relationships beyond traditional employer-employee dynamics and allowing disclosures to entities beyond the Public Protector and the Auditor-General. Moreover, it advocates for strengthening measures to ensure the security and protection of whistleblowers, thereby fostering a more robust culture of disclosure and accountability.

To ***centralise the awarding of large tenders or tenders with long durations***, the National Development Plan (NDP) advocates for a comprehensive overhaul of procurement procedures, including legal reforms aimed at streamlining the procurement process. In addition to designing cost-effective procurement systems conducive to efficient governance, the NDP suggests implementing a tiered review system for tenders based on their value. This tiered approach would entail tailored safeguards and procedures to ensure transparency and accountability in the procurement process, aligning with the NDP's overarching goal of enhancing government efficiency and effectiveness.

In line with ***giving greater teeth to the tender compliance monitoring office to investigate both corruption and the value for money aspect of tenders***, the National Development Plan (NDP) advocates for enhancing the mandate of the Office of the Accountant General within the National Treasury. Currently tasked with overseeing revenue and expenditure management across departments and ensuring compliance with public sector financial management acts, the NDP proposes expanding its role to encompass monitoring procurement practices. This expanded mandate would involve incorporating assessments of value for money into its oversight functions, thereby strengthening its capacity to investigate both corruption and the economic efficiency of tender processes.

The NDP further emphasised strengthening judicial governance and the rule of law. The NDP noted that “at present, there is little or no consensus in the Judicial Services Commission (JCS) about the qualities and attributes needed for the bench” (National Planning Commission, 2013, p. 408). As such, the JSC needs to lead a process to build a consensus on the qualities and attributes of the ideal South African judge. The NDP thus proposed the following, accelerating reforms to implement a judiciary-led independent court administration; the JCS to lead a process to establish clear criteria for appointment of judges, scale up judicial training, consider whether the current form and structure of the JSC is adequate to allow it to fulfil its constitutional mandate, and consider the extension of community service to law graduates (National Planning Commission, 2013, pp. 409-410).

4. Approaches to Monitoring and Evaluating Anti-Corruption Initiatives

As shown in earlier sections of this literature review, there are several legislations and policies that have been formulated to prevent and combat corruption in the country. A review of some of

the approaches to monitoring and evaluating anti-corruption initiatives will be the focus of this section. It will assess the different methodologies that have been employed in tracking the implementation of anticorruption initiatives and provide a few cases that were publicly available to demonstrate how other countries plan for M&E of these initiatives. First, the section will provide an overview of South African mechanisms and institutions mandated to prevent and combat corruption and the role they play in monitoring corruption.

4.1 Institutions and mechanisms for monitoring anti-corruption measures in South Africa

The Zondo Commission. mentioned earlier in this review, has been a critical platform to record the mechanisms used to capture the state. Whilst the Commission is not an institution, it sowed the seeds for formation of institutions such as the Anti-Corruption Commission that will prevent and combat corruption and state capture. It also advocated for revamping of state-owned enterprises in terms of accountability and performance and called for reviewing statutory provisions of institutions such as the South African Revenue Authority (SARS) to ensure transparent and competitive processes for appointment of the accounting authorities. The Zondo report unearthed evidence of state capture involving 1,438 individuals and entities. According to the Presidency Republic of South Africa (2023), the South African government has responded with a plan of action to implement the commission's recommendations. The government has made progress in implementing the plan, including taking steps to strengthen law enforcement and address corruption. The plan submitted to parliament by the President in October 2022 represents a complex multi departmental and multi-agency effort to achieve "an ethical, moral and institutional departure from the abuses revealed by the State Capture Commission" involving 31 government departments and agencies. It represents a major reform initiative designed to redress the wrongs of the past and advance the renewal of society. Many of the actions in the plan are major legislative and institutional reforms that will take many years to achieve.

To ensure accountability and track the implementation progress of these recommendations, the following M&E measures are in place:

- ❖ The Presidency is tasked with producing regular progress reports on the President's response to the Zondo Commission recommendations. These reports provide detailed updates on specific actions taken and those planned.
- ❖ Civil society organisations, watchdogs, and academic institutions can play a crucial role in monitoring implementation, conducting independent research, and holding the government accountable.
- ❖ Regular updates to the public on the implementation efforts and their impact are vital for boosting transparency and public trust. This can be done through media updates, dedicated websites, and public engagement forums.

In addition to M&E measures, these reporting mechanisms are crucial. Parliament is responsible for exercising ongoing oversight of the implementation process, holding relevant ministers and departments accountable through hearings and inquiries. A free and robust media, along with an informed and engaged public, will continue to act as watchdogs and demand transparency.

The Office of the Accountant-General: The Office of the Accountant-General is entrusted with the formal mission of fostering and upholding the effective administration of revenue and expenditure in various departments. Furthermore, it is responsible for overseeing the proper implementation of the Public Finance Management Act (PFMA) and the Municipal Finance Management Act (MFMA). The Office of the Accountant-General also holds the authority to conduct inquiries into public procurement processes within the government sphere and to propose improvements³⁶. Currently, the monitoring and evaluation (M&E) approaches and instruments involve accounting officers monitoring the progress of their department's operational plan, which incorporates the budget. Subsequently, they are required to create, evaluate, and respond to monthly and quarterly reports that must be submitted to the executive authority and the treasury. While systems and procedures for monitoring and reporting monthly budgetary performance are already in place, accounting officers must scrutinise all financial information, including data on grants and transfers, before endorsing the reports demanded by the Act.³⁷

Auditor-General of South Africa (AGSA): The AGSA conducts regular audits of national and provincial government departments, identified public entities, municipalities, and municipal entities (collectively referred to as "clients" or "auditees"). Additionally, the AGSA undertakes discretionary audits, including performance audits, special audits, and investigations³⁸.

In accordance with their audit findings, the AGSA issues an array of reports, encompassing the Annual Reports on the national and provincial audit outcomes and Special Reports on significant audit findings. The audit reports produced by the AGSA are made publicly available and are presented to Parliament, provincial legislatures, and municipal councils. In addition to these audit-specific reports, the AGSA publishes comprehensive reports annually, in which it analyses the findings of the audits conducted at the national, provincial, and municipal levels. These reports are presented to Parliament and provincial legislatures, thereby engendering accountability among public entities for their financial performance. Overall, the AGSA's audits and reports play a pivotal role in ensuring transparency, accountability, and sound financial management within South Africa's public sector.

Cooperative governance: The Cooperative Governance and Traditional Affairs Ministry consists of the Department of Cooperative Governance (DCoG) and the Department of Traditional Affairs (DTA). The Department of Cooperative Governance is mandated to *“develop and monitor the implementation of national policy and legislation aimed at transforming and strengthening key institutions and mechanisms of governance in national, provincial and local government to fulfil their developmental role; develop, promote and monitor mechanisms, systems and structures to enable integrated service delivery and implementation within government; and promote sustainable development by providing support to and exercising oversight of provincial and local government”*³⁹. The Department's mandate is primarily derived from Chapters 3, 5, 6, 7, and 9 of the Constitution of the Republic of South Africa, Act 108 of 1996 as well as the following

³⁶ https://www.gov.za/sites/default/files/gcis_speech/NACS%20Diagonostic%20%20Report%20Final.pdf

³⁷ <https://www.treasury.gov.za/legislation/pfma/guidelines/guide%20on%20in-%20year%20management,%20monitoring%20and%20reporting.pdf>

³⁸ <https://nationalgovernment.co.za/units/view/50/auditor-general-south-africa-agsa>

³⁹ <https://www.gov.za/about-government/government-system/co-operative-governance>

legislation: the Intergovernmental Relations Framework Act 13 of 2005; Municipal Property Rates Act 6 of 2004; Municipal Structures Act 117 of 1998; Municipal Systems Act 32 of 2000; Disaster Management Act 57 of 2002; Remuneration of Public Bearer's Act 20 of 1998; Sections 100, 139 and 154, Monitoring/Intervention Bill⁴⁰. As such the DCoG is mandated to support anti-corruption work, to support good governance, and to improve financial management in local government. In so doing, DCoG uses a variety of methods to monitor and report on the implementation of national policy and legislation regarding governance and service delivery across all government spheres (national, provincial, and local).

Strategic Engagement and Implementation Plan: Cowater is currently engaged in a project funded by Global Affairs Canada. The project is conducted in collaboration with the Department of Public Service and Administration (DPSA). Its primary objective is to enhance accountability, efficiency, and transparency within the public administration system. The project aims to achieve these goals by providing technical assistance to the DPSA in designing and implementing the Public Administration Ethics, Integrity, and Discipline Management Technical Assistance Unit (PA-EIDM-TAU).⁴¹

The mission of PAEIDTAU aligns directly with the National Anti-Corruption Strategy 2020-2030 (NACS). NACS primarily seeks to enhance governance, oversight, and consequence management within the public administration. In this context, the Strategic Engagement and Implementation Plan (SEIP) renders technical support to PAEIDTAU regarding Ethics, Integrity, and Discipline Management activities across all three spheres of government.⁴²

In 2021, the government implemented specific mechanisms, notably Lifestyle Audits, to monitor corruption through a three-phased approach encompassing a risk assessment review, an investigation into lifestyles, and the quantification and evaluation of losses (Lifestyle Audit). SEIP has provided technical support for formulating an implementation guide for lifestyle audits in the South African public service. Additionally, SEIP developed communication products and training programs on fraud. The unit conducted a questionnaire on lifestyle investigations across national and provincial departments and is currently developing procedures and tools to standardise and professionalise lifestyle audit investigations.

Furthermore, SEIP supported PAEIDTAU in developing and implementing the first guide on preventing and managing conflicts of interest in the public service. This guide is crucial for assisting departments in managing the risks associated with conflicts of interest, thereby reducing corruption. The project also contributed to reviewing the Directive and monitoring tools for employees engaged in additional remunerative work and developing an upcoming Directive to professionalise the Ethics Officers function.

⁴⁰ <https://nationalgovernment.co.za/units/view/10/departments-of-cooperative-governance-dcog#:~:text=The%20Department's%20mandate%20is%20primarily,154%2C%20Monitoring%2FIntervention%20Bill.>

⁴¹ <https://www.cowater.com/en/project/strengthening-ethics-and-integrity-in-south-africa/#:~:text=Cowater%20is%20currently%20delivering%20a,public%20administration%2C%20while%20improving%20their>

⁴² [https://www.cowater.com/en/international-anti-corruption-day-supporting-south-africas-path-towards-greater-public-accountability/#:~:text=In%202021%2C%20the%20government%20implemented,of%20losses%20\(Lifestyle%20Audit\).](https://www.cowater.com/en/international-anti-corruption-day-supporting-south-africas-path-towards-greater-public-accountability/#:~:text=In%202021%2C%20the%20government%20implemented,of%20losses%20(Lifestyle%20Audit).)

Dr. Salomon Hoogenraad-Vermaark, Director of the Public Administration Ethics, Integrity, and Disciplinary Technical Assistance Unit (PAEDTAU) of the Department of Public Service and Administration (DPSA), rampant corruption within the Public Service potentially undermines efforts to attract foreign investment⁴³. The establishment of the PA- EID-TAU was intended to enhance ethical and anti-corruption policies, reinforce ethical infrastructure, improve discipline management, and align all three levels of public administration⁴⁴. However, a review of the literature indicated a lack of studies evaluating the effectiveness of the SEIP Framework within the Department of Public Service and Administration.

Anti-Corruption Task Team (ACTT): The ACTT facilitates coordinated efforts within the government to combat corruption and expedite the efficient investigation of high-priority corruption cases. The team comprises representatives from various government entities, including the Directorate for Priority Crime Investigation (DPCI), National Prosecuting Authority (NPA), Asset Forfeiture Unit (AFU), Special Investigating Unit (SIU), South African Revenue Service (SARS), Office of the Accountant-General and Office of the Chief Procurement Officer (OCPO) in the National Treasury, Financial Intelligence Centre (FIC), National Intelligence Coordinating Committee (NICOC), State Security Agency (SSA), The Presidency, Department of Justice and Constitutional Development, Department of Public Service and Administration, and the Government Communication and Information System (GCIS). The ACTT regularly reports its activities and progress to the Anti-Corruption Inter-Ministerial Committee (ACIMC)⁴⁵. The ACTT likely utilises a multifaceted approach to monitor and report on anti-corruption efforts across government departments, including the Auditor-General Reports which entail audits of government departments instances of financial mismanagement that could be linked to corruption.

Anti-Corruption Inter-Ministerial Committee: In accordance with the National Development Plan (NDP) and the Medium-Term Strategic Framework (MTSF), which advocate for the establishment of a robust anti-corruption architecture, the Anti-Corruption Inter-Ministerial Committee (ACIMC) was instituted in June 2014. The ACIMC's primary function is to orchestrate and supervise the efforts of various state organs in combating corruption within both the public and private sectors. Convened and chaired by the Minister for Planning, Monitoring and Evaluation in the Presidency, the ACIMC comprises ministerial representatives from Justice and Correctional Services, State Security, Police, Cooperative Governance and Traditional Affairs, Public Service and Administration, Finance, Home Affairs, and Social Development. Furthermore, the ACIMC serves as a strategic guidance body for the operational activities undertaken by the Anti-Corruption Task Team (ACTT)⁴⁶.

⁴³ <https://www.dpsa.gov.za/thepublicservant/2023/09/20/an-unethical-public-service-undermines-social-and-economic-development/#:~:text=According%20to%20Dr%20Salomon%20Hoogenraad%2DVermaark%2C%20the%20head,Ser vice%20potentially%20undermines%20efforts%20to%20attract%20foreign>

⁴⁴ <https://www.dpsa.gov.za/thepublicservant/2021/09/21/the-new-technical-assistance-unit-will-bolster-efforts-to-fight-misconduct-in-the-public-service-minister-ayanda-dlodlo/>

⁴⁵ https://www.gov.za/sites/default/files/gcis_speech/NACS%20Diagnostic%20%20Report%20Final.pdf

⁴⁶ https://www.gov.za/sites/default/files/gcis_speech/NACS%20Diagnostic%20%20Report%20Final.pdf

The institutions mentioned above, together with the Zondo Commission's recommendations, in carrying out their mandates, will provide critical monitoring data on the progress made by the South African government in preventing and combating corruption. In particular, tracking the implementation of the NACS will benefit immensely from the data provided by these key institutions, especially as the year 2030 draws near.

4.2 The importance of clear indicators and benchmarks for measuring success

The United Nations Office on Drugs and Crime has meticulously compiled an extensive guide to aid in the formulation of national anti-corruption strategies. It is, however, imperative to acknowledge that the sole existence of a strategy does not inherently assure a reduction in corruption. An examination of extant strategies has revealed that while some have facilitated advancements, there have been instances where strategies have been ineffective in delivering tangible results, exemplified by the observation that "impressive strategies had little or no impact on the situation on the ground⁴⁷." To avert such an outcome, Weylandt (2017) posits that drafters of strategies would be well-advised to adhere to best practices concerning the drafting process and content of the strategy.

Furthermore, the report acknowledges the absence of a standardised set of specific recommendations, particularly given that different countries possess diverse legal, cultural, and political traditions and encounter distinct challenges, opportunities, and constraints (Weylandt, 2017, p.3). Nonetheless, there exist general guidelines that, when followed, can enhance the likelihood of the strategy bearing fruit. According to Weylandt (2017), countries should decompose reforms into discrete steps and select suitable, meaningful indicators of progress. Each indicator should possess a baseline against which progress can be measured, as well as a delineated timeline for implementation (Weylandt, 2017).

4.3 Different methodologies and tools used for monitoring and evaluating anti-corruption initiatives

In this section, an overview of countries similar to South Africa is presented, both of which have a well-established country-specific strategic plan on anti-corruption and a structured framework for monitoring the effectiveness of such a strategy. Accordingly, a benchmarking exercise was conducted against Malawi and Namibia, to inform the outline of the design and layout of the National Anti-Corruption Strategy (NACS) monitoring framework.

4.3.1. Malawi

The national anti-corruption strategy of Malawi, known as the National Anti-Corruption Strategy (NACS), employs a framework similar to the approach of South Africa. The National Anti-Corruption Strategy II (NACS II) signifies the government's unwavering commitment to a zero-tolerance stance against corruption. NACS II serves as a comprehensive blueprint for Malawi's aspirations for a society free from corruption. By adopting a holistic approach, NACS II enables

⁴⁷ United Nations Office on Drugs and Crime, "National Anti-Corruption Strategies: A Practical Guide for Development and Implementation" (United Nations, 2015).

all sectors to participate in the fight against corruption actively. It represents a continuation of the anti-corruption drive initiated by the NACS in 2008.

The development of NACS II is grounded in extensive research on the state and drivers of corruption in Malawi, complemented by multi-stakeholder consultations and a political economy analysis. Its methodology draws upon international evidence regarding best practices in drafting national anti-corruption strategies (Basel Institute of Governance, 2019). The successful implementation of NACS II depends on the active involvement and collaboration of all sectors.

Through the pursuit of three mutually reinforcing strategic goals—**improving service delivery, improving, and strengthening the rule of law and promoting a culture of integrity**—NACS II aims to contribute significantly to the achievement of Malawi's broader development agenda (Republic of Malawi, n.d., p. xi)

NACS II underscores that the eradication of corruption holds priority status within Malawi's development agenda, as outlined in the Malawi Growth and Development Strategy III (MGDS III). In so doing, The National Anti-Corruption Strategy II (NACS II) presents a framework for combating corruption. NACS II focuses on achieving three overarching strategic goals: enhancing the quality of service delivery, reinforcing the rule of law, and fostering a culture of integrity.

The strategy outlines twelve pillars that encompass Malawian society and assigns specific tasks to each pillar to attain clear objectives and goals. These pillars are the Executive, Legislature, Judiciary, Local Government, Private Sector, Non-Governmental Organisations/Civil Society, Faith-Based Organizations, Media, Traditional Leaders, Youth, Academia, and Women.

NACS II also includes additional pillars, such as Youth, Academia, Women, and Local Government. Overall leadership and direction for the implementation of NACS II will be provided by a multi-sectoral National Integrity Committee (NIC), while the Anti-Corruption Bureau (ACB), the legally mandated body responsible for spearheading the fight against corruption, will offer technical guidance to the NIC (Republic of Malawi, n.d.).

The Malawi NACS II Monitoring and Evaluation Framework incorporates several pillars for implementing anti-corruption activities. Each pillar is tasked with the responsibility of monitoring and evaluating its activities, and subsequently reporting them to the Anti-Corruption Bureau (ACB) Monitoring and Evaluation Unit. The Framework also facilitates peer reviews among the different pillars. The primary purpose of these monitoring and evaluation processes is to encourage self-evaluation and foster the exchange of valuable insights. The table below outlines the structure and the Malawian NACS II monitoring and evaluation plan.

Table 4: Outline of the Malawian NACS II (Monitoring Plan)

Objective	Strategic Activities	Expected Outputs	Means of Verification	Implementing Body	Time Frame
xxx	xxx	xxx	xxx	xxx	xxx

4.3.2. Namibia

The Republic of Namibia implemented its novel National Anti-Corruption Strategy and Action Plan 2016- 2019 (NACSAP) to promote integrity, accountability and transparency across all spheres of society. The Strategy had 75 actions implemented by 22 implementing institutions. The Namibian government launched the second National Anti-Corruption Strategy and Action Plan in 2022., Namibia's National Anti-Corruption Strategy and Action Plan (NACSAP) for 2021-2025, as a tool to promote cooperation and synergy across all sectors of society. The plan's primary objective is to promote a system of integrity, accountability, and ethics. The plan also focuses on the normative context of Namibia's corruption landscape, including the causes of corruption, legal framework, social and economic dynamics, and country context (Anti-Corruption Commission, 2021).

Similar to the Malawi NACS II, this Strategy further includes other players and bodies of the private sector, sports and youth fraternities. Furthermore, it included specific actions for the media, civil society and faith-based organisations, regional councils, local authorities, and the youth (Anti-Corruption Commission, 2021)

The National Anti-Corruption Strategy and Action Plan for the period 2021-2025 delineates the activities and action plan of the National Anti-Corruption Strategy (NACS) to be implemented over five years, ensuring the integration of NACS activities into the strategic plans of implementing institutions.

This revised Strategy revisits its strategic objectives to ensure their alignment with current and evolving national priorities, encompassing integrity systems, good governance, and accountability within the sectors initially outlined in the Strategy. Additionally, it incorporates other pertinent sectors such as the environment, agriculture, and tourism, as deemed relevant. (Anti-Corruption Commission, 2021).

Table 5: Outline of Namibia's NACSAP (Monitoring Plan)

Strategic Objective	Implementing Institution	Action	Output	KPI	KPI Definition	KPI Type	Targets	Baseline	Planned Action Steps
xxx	xxx	xxx	xxx	xxx	xxx	xxx	xxx	xxx	xxx

4.4. Similarities between NACS II and NACSAP and specific learnings for South Africa

NACS II and NACSAP both involve all facets of society, including government, private sector, and civil society, in the anti-corruption campaign. This multi-stakeholder approach engenders widespread ownership and responsibility.

Each framework delineates specific pillars, accompanied by designated tasks and action plans, for the attainment of their goals. This strategy provides clarity and direction for implementation. Progress monitoring and evaluation mechanisms are incorporated in both frameworks, utilising self-evaluation and peer reviews to ensure sustained improvement.

By leveraging the lessons gleaned from the Malawi and Namibia case studies, South Africa can establish a more robust and all-encompassing anti-corruption monitoring framework, thereby contributing to the successful attainment of its wider developmental objectives. As such, based on the NACS II and NACSAP, the potential for the development of the South African monitoring plan includes:

- 1) South Africa can encourage wider participation from all sectors in developing and implementing the anti-corruption strategy, as highlighted in both Malawi and Namibia's plans.
- 2) South Africa can adopt a more robust monitoring and evaluation framework, similar to Malawi's, with regular self-evaluations and peer reviews among different sectors to promote accountability and knowledge sharing.
- 3) Regularly review and update the strategy, as done in Namibia, to ensure alignment with current national priorities and evolving challenges.
- 4) Consider assigning specific tasks and responsibilities to each stakeholder group for achieving the goals.

5. Conclusion and recommendations for South Africa

In conclusion, corruption remains a severe challenge in South Africa, with far-reaching consequences for the country's economy, political stability, and social well-being. The NDP acknowledges corruption as a significant impediment to achieving the country's developmental goals and emphasises the importance of a comprehensive approach that includes political will, strong institutions, a solid legal foundation, and an active citizenry that holds public officials accountable. Despite ongoing efforts, Transparency International's Corruption Perceptions Index and the World Bank's governance indicators continue to raise concerns about South Africa's corruption levels. The Zondo Commission's findings highlight the widespread corruption in the country's public sector. However, substantial progress has been made, including the formation of the NACS, as well as the implementation of several anti-corruption initiatives. Nonetheless, concerted efforts are needed to effectively combat corruption and achieve the NDP's vision of a corruption-free society.

Moving forward, South Africa can learn from international best practices, such as Malawi and Namibia's anti-corruption measures. These countries have developed multi-stakeholder methods, clear objectives and action plans, and strong monitoring and evaluation systems. South Africa's anti-corruption measures can be strengthened by encouraging greater engagement, improving monitoring methods, reviewing and revising tactics regularly, and allocating particular roles to stakeholders. Furthermore, there is a requirement for ongoing political will, proper financial allocation, and effective anti-corruption legislation and regulations. Finally, eliminating corruption necessitates collaborative action and a firm commitment to maintaining integrity, accountability, and transparency in all areas of society.

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Appendix Two: Draft Monitoring Framework

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
PILLAR 1-CITIZEN PARTICIPATION (Focus - Promote and encourage active citizenry, whistleblowing, integrity, and transparency in all spheres of society.)					
Outcome 1A: Active citizenry empowered through advocacy campaigns on anti-corruption, governance matters; and the negative effects of corruption	Anti-corruption strategy launched via a broad-based multi-sectoral event	Strategy launched already	-	-	-
	Increased reach and engagement across diverse communication channels.	Number of communication channels (e.g., TV, radio, social media) used in the national communication plan.	Government communication offices. Media monitoring agencies. Reports from media outlets.	Reports from media monitoring tools	Risk: Limited access to certain channels in specific regions
	Percentage increase in public adherence to the promoted values as evidenced by surveys or behavioural observations.	Percentage increase in public awareness of the values reorientation campaign over time.	Pre and post-campaign surveys; Social media analytics; Website traffic and engagement metrics	Comparative analysis of survey results; Analytics tools for social media and website metrics	Assumption: Increased awareness leads to behavioural change.
	Improved perception and trust levels of citizens towards the targeted values.	Surveys or polls measuring the perception of citizens towards values such as integrity, accountability, and transparency before and after the communication plan implementation.	Pre- and post-campaign surveys; Public opinion polls conducted by independent research organisations	Reports from independent research organisations	Assumption: Surveys accurately reflect public opinion Risk: Survey results may have inherent bias
	Increased empowerment and exercise of citizens' rights within targeted populations.	Number of programs or workshops conducted to promote citizens' rights awareness	Program or workshop records from implementing agencies; Participant feedback forms	Attendance registers; Photos or videos from the events	Risk: Participants may not fully understand the information provided
	Increase utilisation of legal resources and reporting of rights violations among the citizenry.	Percentage increase in citizens' awareness and understanding of their rights in targeted populations.	Pre and post-event surveys; Social media analytics for awareness campaigns	Comparative analysis of survey results; Social media engagement metrics	Risk: External factors impacting awareness levels.
	Percentage increase in the number of sustained collaborative efforts or projects led by CSOs, educational institutions, or community groups post-partnership establishment.	Number of partnerships established with CSOs, educational institutions, or community groups to support the implementation of citizens' rights programs.	Partnership agreements and MOUs Meeting minutes documenting collaboration Reports on joint activities or initiatives	Documented evidence of signed agreements; Records of collaborative events or projects; Feedback from partners on the effectiveness of collaboration	Assumption: Partnerships lead to increased impact. Risk: Conflicting goals or interests among partner organisations.
	Percentage increase in the adoption of ethical behaviour and demonstration of knowledge about citizens' rights among students in schools where campaigns have been integrated into the curriculum.	Number of schools that have integrated education campaigns on values and citizens' rights into their curriculum.	School curriculum records; Reports from education department	Documentation of integrated campaigns in school curricula	Risk: Resistance or challenges in integrating new content into the curriculum.
	Percentage increase in students' active engagement in promoting ethical behaviour and advocating for citizens' rights, as evidenced by their participation in related activities or	Percentage increase in students' knowledge and understanding of ethical values and citizens' rights.	Student surveys	Feedback from students through surveys	Risk: External factors affecting students' learning experiences.

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
	initiatives within and outside the school environment.				
	Increased collaboration and commitment to anti-corruption efforts among stakeholders as evidenced by policy changes or enforcement actions.	Successful organisation and participation in annual anti-corruption summits.	Event documentation, attendance records, participant feedback.	Analysis of event documentation, attendance reports, and participant surveys.	Risk: Limited participation from key stakeholders. Assumption: Effective communication and promotion of the summit.
	Percentage increase in public trust in government institutions and perceived transparency in decision-making processes, as measured by surveys or polls conducted after public dialogues.	Number of government-supported public dialogues conducted.	Dialogue documentation, participant lists.	Analysis of records from conducted dialogues.	Risk: Lack of interest or participation from targeted groups. Assumption: Inclusive and transparent planning and execution of dialogues.
		Implementation of recommendations from public dialogues.	Progress reports on the implementation of dialogue recommendations.	Analysis of progress reports and outcomes.	Risk: Resistance to implementing recommendations. Assumption: Adequate resources and commitment for implementation.
Outcome 1B: All stakeholders, across all sectors of society, work together towards a common goal of preventing and combating corruption within their spheres of influence; and people willingly report corruption because they understand the benefits of doing and whistleblowers feel protected and supported.	Informed decision-making and strategic planning for the establishment of the central reporting agency.	Number of comprehensive feasibility studies conducted, outlining the potential benefits, challenges, and implementation requirements of a central reporting agency.	Feasibility study report	Review of completed feasibility study documents Records of stakeholder meetings and consultations	Assumption: Findings accurately represent potential benefits and challenges. Risk: Incomplete data or bias in the feasibility studies.
	Efficient allocation and utilisation of resources for the successful implementation of the central reporting agency.	Estimated budget and resources required for the establishment of the agency.	-	-	Risk: Unforeseen costs or changes in resource requirements.
	Prompt and effective implementation of the central reporting mechanism.	Timeliness of the establishment of the central reporting agency in accordance with the recommended timeline from the feasibility studies.	Project timelines and milestones Progress reports and updates Stakeholder communication records	Review of project timelines against actual progress Documentation of achieved milestones	Risk: Delays due to unforeseen challenges or changes in project scope.
	Improved accountability and responsiveness in addressing reported cases.	Number of reported cases processed through the new central reporting mechanism.	Reports from the central reporting agency	Audits or reviews of case processing procedures	Risk: Backlogs or inefficiencies in case processing
	Percentage increase in the number of whistleblower reports where recommendations are implemented within the specified timeframe, resulting in demonstrable improvements in organizational processes, practices, or outcomes.	Timeliness of implementing recommendations from whistleblower reports.	Whistleblower report documentation, implementation reports; Implementation timelines in the reports.	Analysis of the time taken to implement recommendations.	Risk: Delays in the decision-making process. Assumption: Adequate resources and commitment for timely implementation.
	Improved organizational culture and support for whistleblowing.	Number of organisations that have updated or strengthened their policies and procedures to encourage whistleblowing.	Updated policy documents; Internal audit or compliance reports	Review of updated policy documents; Audit reports on policy compliance	Assumption: Updated policies are effectively communicated and understood.

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
	Enhanced transparency and accountability in organizational practices.	Percentage increase in the number of reported cases within organisations after the implementation of the new policies.	Incident reporting records	Trends in reported cases over time	Assumption: Increased reporting indicates improved trust in the system.
	Percentage increase in the number of employees who report feeling confident in their ability to identify and report misconduct, as evidenced by post-training surveys or assessments.	Percentage of employees who have undergone training on whistleblowing policies and procedures.	Training attendance records Training evaluation surveys Training materials and curriculum documentation	Review of attendance records Analysis of training evaluation results	Risk: Inadequate training leading to misunderstandings or non-compliance
	Enhanced trust in the confidentiality and fairness of the whistleblowing process, as measured through employee satisfaction surveys or feedback mechanisms.	Level of satisfaction among employees with the provided training and support mechanisms.	Employee satisfaction surveys or feedback mechanisms.	Survey findings	
Outcome 1C: Increased public participation and discourse on ethical conduct and a shift in the national consciousness towards societal reorientation to a values-based way of life evident in communities, workplaces, schools, higher education institutions and other civil society structures.	Enhanced ethical awareness and behaviour among students.	Number of higher education institutions that have integrated ethics and integrity courses into their curriculum.	Institutional curriculum documentation. Reports from the DBE/DHET or relevant higher education regulatory bodies.	Official curriculum documents from higher education institutions. Confirmation from regulatory bodies regarding the inclusion of ethics courses.	Risk: Resistance from institutions to integrate ethics courses. Assumption: Supportive policies or incentives encouraging institutions to incorporate ethics education.
	Strengthened commitment to ethical education and values among students and institutions.	Percentage increase in the enrolment of students in ethics and integrity courses over a specific period.	Enrolment records from higher education institutions. Student surveys on course selection and preferences.	Comparative analysis of enrolment data over the specified period. Surveys measuring student interest and motivation for selecting ethics courses.	Risk: Lack of student interest or awareness of the importance of ethics courses. Assumption: Effective communication and promotion of the value of ethics education.
	Improved organisational culture and commitment to ethical conduct.	Number of companies/ organisations that have adopted corporate integrity pledges.	Corporate records and documentation; Self-reporting by companies/ organisations; Industry or sector-specific surveys and reports.	Review of the relevant reports	Risk: Reluctance to disclose or report on the adoption of integrity pledges. Assumption: Encouragement and recognition programs for companies adopting integrity pledges
	Enhanced awareness and understanding of ethical standards among employees.	Percentage of employees within organisations that have undergone training on the importance and implementation of corporate integrity pledges.	Employee training records; Training program documentation.	Analysis of employee training databases. Surveys or interviews with employees to assess training awareness	Risk: Limited participation or engagement in training programs. Assumption: Clear communication on the importance of integrity training and its benefits.
	Strengthened media freedom and independence, fostering a more robust and pluralistic democratic society.	Number of policies or initiatives implemented to safeguard media freedom and independence.	Government reports on media policies; Documentation from media organisations; Reports from media freedom organisations and NGOs.	Review of official government communications or policy documents; Reports and publications from media freedom organisations.	Risk: Limited transparency in reporting on policies. Assumption: Open and collaborative relationships between government, media organizations, and media freedom watchdogs.

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
	An enhanced media landscape that promotes investigative journalism and reporting on anti-corruption.	Percentage of journalists who report feeling safe and supported in covering corruption-related issues	Surveys and interviews with journalists. Reports from media organisations or unions.	Analysis of survey results measuring journalists' perceptions of safety and support. Confirmation from media organisations regarding internal feedback mechanisms.	Risk: Fear of retaliation leading to underreporting of concerns. Assumption: Implementation of effective whistleblower protection mechanisms and open channels for reporting.
	Percentage decrease in instances of ethical misconduct or corruption within sectors with established committees or forums	Number of established ethics and integrity management committees or forums across different sectors.	Documentation from relevant sectors or organisations; Reports from oversight bodies or regulatory agencies.	Review of official documents indicating the establishment of committees or forums. Confirmation from oversight bodies or regulatory agencies.	Risk: Lack of standardised reporting or inconsistent documentation. Assumption: Consistent reporting practices and transparency in the establishment of committees or forums.
	Enhanced capacity and commitment to ethical conduct among key stakeholders.	Percentage of key stakeholders within sectors who have received training on ethical practices and integrity management.	Training records from sectors or organisations. Reports from training programs or institutions. Self-reporting by sectors or organisations.	Analysis of training databases or records. Confirmation from training program providers. Surveys or interviews with key stakeholders on their training experiences.	Risk: Inadequate participation or engagement in training programs. Assumption: Effective communication and promotion of the importance of ethical practices and integrity training.
	Percentage decrease in the average time taken to resolve reported corruption cases within sectors with established committees	Number of reported cases of corruption within sectors before and after the establishment of ethics and integrity management committees.	Official reports on corruption cases. Documentation from oversight bodies or regulatory agencies.	Comparative analysis of reported cases before and after the establishment of committees.	Risk: Underreporting due to fear of retaliation. Assumption: Whistleblower protection mechanisms in place and trust in reporting systems.
Outcome 1D: Greater transparency and improved measures for providing access to information in all sectors, in particular about governance, that is, business, CSOs and political parties.	Enhanced transparency and accessibility of information within organizations as a result of PAIA.	Number of PAIA reviews conducted to identify areas for improvement.	Internal audit reports. Reports from the Information Regulator or oversight body. Documentation from public institutions.	Review of internal audit reports detailing PAIA reviews; Confirmation from the information regulator or oversight body; Documentation from public institutions indicating areas identified for improvement.	Risk: Lack of comprehensive internal reviews. Assumption: Commitment to transparency and continuous improvement, resulting in thorough internal reviews.
	Increase in instances where information obtained through PAIA requests has led to positive changes, such as increased public scrutiny, or accountability measures.	Number of reported cases where PAIA has been used to request and obtain information.	PAIA request records from public institutions. Reports from the Information Regulator or oversight body. Documentation from public institutions.	Analysis of PAIA request databases or records. Confirmation from the information regulator or oversight body. Documentation from public institutions detailing instances where PAIA was used to obtain information	Risk: Underreporting of cases where PAIA was used. Assumption: Effective and transparent reporting mechanisms in place, and awareness of the importance of reporting such cases.
	Enhanced efficiency and effectiveness of administrative processes.	Number of identified weaknesses in the current administrative systems addressed and resolved.	Audit reports; Reports from oversight bodies or regulatory agencies; Documentation from improvement initiatives.	Review of internal audit reports and improvement project documentation. Confirmation from oversight bodies or regulatory agencies.	Risk: Inadequate reporting or identification of weaknesses. Assumption: Thorough and transparent internal reporting practices, and a commitment to addressing weaknesses.

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
				Comparative analysis of reported weaknesses before and after improvement initiatives.	
	Increased confidence in administrative processes and compliance with regulations.	Feedback from oversight bodies or agencies regarding the effectiveness of the improved administrative systems.	Reports or communications from oversight bodies. Surveys or interviews with oversight bodies.	Analysis of reports or communications indicating the effectiveness of improved systems. Surveys or interviews with oversight bodies assessing the impact of administrative system improvements	Risk: Limited or biased feedback. Assumption: Open and honest communication channels, and a collaborative relationship with oversight bodies.
	Improved oversight functions supported by digitised administrative systems and enhanced data integrity management.	Percentage increase in the accuracy and completeness of available data.	Comparative analysis of data accuracy and completeness over time; Internal data quality reports. User feedback or complaints related to data accuracy and completeness.	Data quality assessments comparing the accuracy and completeness of data at different time points; Internal reports on data quality measures; User feedback surveys or interviews assessing perceived improvements.	Risk: Inaccurate or biased self-reporting on data quality. Assumption: Transparent reporting practices and a commitment to data accuracy and completeness
		Number of data sources integrated to create a comprehensive dataset.	Documentation on data integration initiatives; Reports on the establishment of comprehensive datasets; Stakeholder communications on integrated data sources.	Review of documentation related to data integration projects; Reports detailing the creation of comprehensive datasets; Communication records indicating collaboration with various data sources.	Risk: Limited collaboration or resistance from data sources. Assumption: Willingness and cooperation from various data sources to contribute to the integrated dataset.
	Increase in corruption investigations or prosecutions facilitated by access to accurate and comprehensive beneficial ownership information.	Number of mechanisms implemented to collect and disclose beneficial ownership information.	Reports, surveys or interviews with stakeholders involved in implementing beneficial ownership disclosure mechanisms	Reviewing official reports or databases; analysis of survey or interview findings	Risk: Incomplete or inaccurate reporting from companies, which may undermine the reliability of the data. Assumption: Regulatory agencies or government bodies effectively enforce compliance with beneficial ownership disclosure requirements.
	Increase in the percentage of companies or entities that comply with beneficial ownership disclosure requirements over time.	Percentage of companies or entities that comply with the beneficial ownership disclosure requirements.			
	Improve transparency in governance through professional guidelines, information campaigns and communication on successes, e.g. arrests/ convictions, and the consequences of corruption	Number of professional guidelines established and adopted for transparent governance.	-	-	-
		Effectiveness of information campaigns measured through public awareness surveys.			
		Number of communication channels used to share successes in anti-corruption efforts and consequences of corruption.			

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
	Adoption and implementation of reporting mechanisms in private sector organisations	Number of private sector organisations with established reporting mechanisms for corruption.	Internal reports from private sector organizations. Compliance documentation indicating the establishment of reporting mechanisms.	Review of internal reports detailing the establishment of reporting mechanisms. Confirmation through compliance documentation or policies.	Risk: Underreporting due to lack of transparency. Assumption: Commitment to transparency and adherence to reporting standards.
	Improved reporting culture and transparency in the private sector	Percentage increase in reported cases from the private sector.	Internal records of reported cases. External reports or publications highlighting reported cases.	Comparative analysis of reported cases over specific periods. Cross-referencing internal records with external reports for validation.	Risk: Underreporting due to fear of consequences. Assumption: Effective whistleblower protection mechanisms in place.
	Improvement in the satisfaction and confidence levels of whistleblowers with the support mechanisms provided by their organisations.	Effectiveness of support mechanisms provided to whistleblowers from the private sector.	Whistleblower protection program documentation. Surveys or feedback mechanisms assessing whistleblower satisfaction.	Analysis of documentation outlining support mechanisms. Surveys or interviews with whistleblowers to gauge their satisfaction and perceived effectiveness of support.	Risk: Inadequate support leading to underutilization of reporting mechanisms. Assumption: Regular assessments and improvements in support mechanisms based on feedback.
	Enhanced Transparency in Political Party Funding through disclosures	Percentage of political parties that disclose their sources of funding.	Financial reports or disclosures from political parties. Publicly available documentation on political party funding.	Review of financial reports or disclosure documents provided by political parties. Cross-referencing publicly available information on political party funding.	Risk: Incomplete or selective disclosure by political parties. Assumption: Implementation of regulatory measures ensuring comprehensive and accurate disclosure.
	Strengthened regulatory framework for political party funding transparency	Number of regulatory measures or policies implemented to enhance transparency in political party funding.	Government reports or official documentation on regulatory measures. Reports from oversight bodies or regulatory agencies.	Review of official government reports detailing implemented regulatory measures. Confirmation from oversight bodies or regulatory agencies.	Risk: Inadequate enforcement of regulatory measures. Assumption: Commitment to effective enforcement and regular assessments of regulatory compliance.
PILLAR 2 - PROFESSIONAL CONDUCT (Focus - Advance the professionalisation of employees to optimise their contribution to create corruption-free workplaces.)					
Outcome 2A: Support professionalisation of the public sector by giving effect to Chapter 13 of NDP	Improved transparency and meritocracy in public official appointments	Number of reforms implemented in the appointment processes for public officials.	Official government reports on reforms in appointment processes. Documentation from relevant government agencies.	Comparative analysis of appointment processes before and after reforms. Review of official government reports outlining specific reforms.	Risk: Inadequate documentation or reporting on implemented reforms. Assumption: Transparent reporting practices and a commitment to detailing reforms.
	Improved competence and efficiency of public officials due to competency assessment programs.	Number of competency assessment programs implemented for public officials.	Documentation on competency assessment programs. Reports from government agencies overseeing competency assessments.	Analysis of documentation detailing the establishment and implementation of competency assessment programs. Confirmation from relevant government agencies.	Risk: Limited implementation or effectiveness of competency assessments. Assumption: Ongoing evaluations and adjustments to improve the effectiveness of competency assessments.
	Enhancement of the public sector workforce's capacity and performance in key professions due to graduate recruitment programmes.	Percentage increase in the number of graduates recruited for key professions.	Human resources records on graduate recruitment. Reports from government agencies on recruitment strategies.	Comparative analysis of the number of graduates recruited over specific periods.	Risk: Insufficient recruitment strategies to attract graduates.

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
				Review of government reports on strategies and initiatives for recruiting graduates.	Assumption: Implementation of targeted and effective recruitment strategies.
		Evaluation of the impact of graduate recruitment on the diversity and skill set of the public sector workforce.	Diversity and skill set assessments of the public sector workforce. Surveys or evaluations of the impact of graduate recruitment.	Analysis of workforce diversity and skill set data before and after graduate recruitment initiatives.	Risk: Limited impact on diversity and skill set due to various factors. Assumption: Continuous adjustments to recruitment strategies to enhance impact.
		Number of successful initiatives to retain and develop graduate recruits within the public sector	Reports on retention and development initiatives for graduate recruits. Feedback from graduate recruits on their experiences.	Review of official reports on successful retention and development initiatives.	Risk: High turnover rates among graduate recruits. Assumption: Implementation of effective retention and development initiatives based on feedback and assessments.
Outcome 2B: Enhance the capacity and integrity of the professions central to anti-corruption efforts.	Increased Competency Levels among professionals central to anti-corruption (e.g., law enforcement, auditors, investigators) after participating in specialized training programs.	Number of specialised training programs developed and implemented for professionals central to anti-corruption (e.g., law enforcement, auditors, investigators).	Training records from relevant institutions, feedback from participants, reports from training providers		
		Number of reported cases of corruption successfully handled by professionals who received specialised training			
	Percentage increase in the adoption and integration of ethical principles and standards within the operational frameworks of professions with developed ethics curricula.	Number of professions with developed and integrated ethics curricula.	Curricula documents	Surveys of professionals, reports from professional associations	
		Percentage increase in professionals reporting awareness and understanding of ethical principles within their curricula.			
	Percentage increase in the adoption and implementation of updated or strengthened ethical standards by professional associations.	Number of professional associations that have updated or strengthened their ethical standards.	Codes of ethics, membership surveys, reports of disciplinary actions.	Review existing reports	
		Number of professional associations that have updated or strengthened their ethical standards.			
PILLAR 3 - ETHICAL GOVERNANCE WITH OVERSIGHT AND CONSEQUENCE MANAGEMENT (Focus - Enhance governance, oversight, and consequence management in organisations)					
Outcome 3A: Enhance ethical leadership across sectors	Improved Governance Knowledge and Practices by boards following participation in director development programs.	Percentage increase in the participation of board members in director development programs.	Attendance registers for development programs, completion certificates, feedback surveys		
	Comprehensive adoption and effective implementation of strengthened ethics	Adoption and implementation of strengthened ethics frameworks for politicians.	Documentation of updated ethics frameworks, reports on training sessions, compliance assessments.		

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
	frameworks for politicians within government institutions.				
		Number of leadership awards instituted and presented for outstanding anti-corruption work.	Records of award ceremonies, media coverage, testimonials from awardees.		
		Number of public dialogues held in rural areas, with a focus on traditional leadership	Records of public dialogue sessions, attendance registers, media coverage, feedback forms.	Review records and assess feedback forms	
	Effectiveness and utilisation of developed and implemented mechanisms aimed at enhancing accountability and compliance within government institutions and organisations.	Number of mechanisms developed and implemented to enhance accountability and compliance.	Documentation of new mechanisms, reports on compliance assessments, disciplinary records	Review evidence from the documentation	
Outcome 3B: Strengthen oversight and governance capacity in the public sector.	Enhanced effectiveness of constitutional and oversight bodies:	Percentage increase in the implementation of recommendations resulting from assessments aimed at strengthening Constitutional and other oversight bodies (e.g., Auditor-General South Africa (AGSA), Public Protector, IPID, etc.).	Reports documenting the recommendations made during the assessment. Progress reports outlining the status of the implementation of each recommendation.	Stakeholder consultations to gather feedback on the perceived effectiveness of the implemented recommendations.	Risk: Incomplete or delayed implementation of recommendations. Assumption: Adequate resources and commitment from relevant authorities for timely implementation.
	Local Government Anti-Corruption Strategy and relevant provincial strategies implemented	Percentage of Local Government Anti-Corruption Strategy Implemented	Implementation progress reports from local government authorities. Internal assessments and evaluations measuring the implementation status.	Review of progress reports outlining the actions taken to implement the strategy; Internal assessments comparing the intended actions with the actual implemented measures; Surveys or interviews with stakeholders to gauge their perception of the strategy's implementation.	Risk: Overstated reports on the level of implementation. Assumption: Transparency and integrity in reporting practices, verified through internal and external assessments.
	Capacity and performance of municipal oversight functions in the local government sphere improved.	Level of enhancement in the capacity and effectiveness of oversight functions in the local government sphere improved.	Reports on the implementation of capacity-building initiatives, assessments of oversight bodies' performance, feedback from stakeholders.	Assess trends in documentation of capacity-building initiatives, including training materials, session plans, and participant feedback.	Risk: Oversight bodies providing incomplete or biased reports Assumption: That participation in training programs directly translates to improved capacity.
Outcome 3C: Strengthen ethics and integrity promotion across sector	Enhanced adherence to ethics requirements of the Public Service Regulations and other legislation regulating the conduct of employees of the state and public representatives.	Percentage increase in the completion of ethics training by public service employees.	Training records, employee surveys on ethics awareness	Analysis of training records and data from surveys	Risk: Incomplete or inaccurate training records. Assumption: That completion of training equates to a genuine understanding of ethical principles.
	Requirements of the Public Service Regulations and other legislation regulating ethics, the conduct of	Mechanisms to identify and track public service employees conducting business with the State put in place	MoU outlining the roles of the DPSA, SAPS, DOJ and NPA in dealing with this issue.	Analysis of number of matters identified and reported to SAPS	Risk: Data from CIPC on public servants who are doing business may be outdated

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
	employees of the state and public representatives implemented.				Assumption: That stakeholders will conduct the identification process efficiently
	Efficiency and effectiveness of database administered by the DPSA for public sector officials found guilty of fraud, corruption, or white-collar crimes:	Percentage increase in the accuracy and completeness of the database administered by the Department of Public Service and Administration (DPSA) containing records of public sector officials found guilty of fraud, corruption, or other white-collar crimes.	Reports on updates, additions, or removals from the database. Audits of the database to ensure data accuracy and security.	Review of access logs and user activity records. Regular reports on database updates and maintenance. Independent audits of the database to verify accuracy and compliance.	Assumption: Database administration procedures are effective and secure. Risk: Unauthorised access, data breaches, or inaccurate information.
	Completion and Implementation of Integrity Testing and Lifestyle Audits Framework for Senior Officials	Framework for integrity testing and lifestyle audits framework finalised, and processes implemented (starting with senior officials involved in tender processes, supply-chain management officials, members of boards of SOEs) drafted and finalised for implementation	Drafts and versions of integrity testing and lifestyle audits framework	Review of the finalised framework documents; feedback from stakeholders involved in the consultation process.	Assumption: Framework is comprehensive and aligns with ethical standards. Risk: Lack of stakeholder consensus or understanding of the framework.
		Framework implemented according to set timelines	Reports on implementation of framework	Review the recommendations and gaps in implementation were possible	Risk: Poor quality of reports on implementation
	Percentage increase in employees reporting an enhanced understanding of legislation and ethics principles upon completion of training.	Number of training sessions and capacity-building programs conducted within the public sector aimed at promoting an enhanced understanding of key legislation relevant to anti-corruption..	Training records, assessments of legislative knowledge.	Pre- and post-training assessments,	
	Level of integration of integrity promotion measures into the performance management contracts of senior managers across different sectors.	Percentage of employees with integrity-related key performance indicators (KPIs) integrated into their performance assessments.	Performance appraisal records, employee surveys.		
Outcome 3D: Strengthen Accountability and programme management in organisations across sectors.	Research focused on the development of anti-corruption architecture and investigative capacity in the public sector conducted.	Research report of good quality and relevance produced.	Final report and recommendations	Expert reviews, feedback from key stakeholders.	Assumption: The chosen criteria for quality assessment are relevant to the goals of the research. Risk: Biases in the review process may impact the objectivity of the assessment.

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
	Improved responsiveness and effectiveness in addressing misconduct, promoting accountability, and deterring corrupt behaviour among employees	Reduction in the average time taken to conclude disciplinary cases.	Disciplinary case records, including timeframes for each case.	Comparative analysis of disciplinary case durations before and after interventions.	Risk: Legal complexities may prolong disciplinary processes.
	Extent to which targeted professions have adopted and effectively implemented accountability frameworks to promote ethical conduct and accountability.	Number of targeted professions (e.g., law enforcement, finance, procurement) that have adopted and implemented accountability frameworks to guide ethical conduct and ensure accountability.	Documentation of accountability frameworks developed and adopted.	Reports on the integration of accountability frameworks into professional standards.	Risk: Resistance from professional bodies.
	Anti-corruption compliance culture in private companies and state-owned entities established.	Percentage increase in private companies and state-owned entities with established anti-corruption compliance programs.	Self-assessment reports from companies and entities.	Documentation of anti-corruption policies, training programs, and compliance measures.	Risk: Lack of commitment from leadership. Assumption: Legal requirements and incentives for compliance are in place.
PILLAR 4 - CREDIBLE, TRANSPARENT PROCUREMENT SYSTEM (Focus - Improve the integrity and credibility of the public procurement system)					
4.A Enhance oversight and enforcement in public procurement.	Improvement in the capacity of regulatory bodies and enforcement agencies to ensure adherence to relevant legislation, policies, and procedures regulating financial conduct and procurement.	Percentage increase in the number of government agencies with strengthened regulatory and enforcement capacity.	Annual reports from relevant government agencies, audit reports.	Comparison of current capacities with baseline data; reports from external audit agencies.	Risk: Resistance to change within government agencies. Assumption: Adequate budget allocation for capacity-building.
	Percentage increase in the number of whistleblowing reports filed regarding illegal conduct or corrupt practices within the public procurement system.	Number of whistleblowing reports received and acted upon in the public procurement system.	Official complaint databases.	Analysis of reported cases, investigation outcomes	Risk: Fear of retaliation affecting reporting accuracy. Assumption: Effective whistleblower protection mechanisms are in place.
	Enhanced business integrity in large procurement contracts, e.g. the introduction of cross-sectoral integrity pacts.[1]	Number of cross-sectoral integrity pacts implemented in large procurement contracts.	Records of implemented integrity pacts, procurement databases.	Documentation of integrity pact implementation, procurement contract reviews.	Risk: Lack of commitment from private sector entities. Assumption: Clear legal frameworks supporting integrity pacts.
4.B Improve transparency and data management in public procurement.	Successful establishment and implementation of an integrated digital financial and procurement management system across relevant government agencies or departments.	Percentage increase in the adoption of the integrated digital financial and procurement management system among relevant government departments and agencies.[2]	User registration and login records, system usage analytics.	System-generated reports on user activity, feedback from system administrators and users.	Risk: Resistance to digital transformation. Assumption: Sufficient training and support for system users.
	Public education tools to support accountability established and implemented.	Measure the reach of public education tools by tracking the number of individuals exposed to the tools and their level of engagement (e.g., views, downloads, interactions).	Analytics data from online platforms, download statistics, attendance records for physical events.	Reports from communication and education teams, online platform analytics.	Risk: Limited public engagement. Assumption: Assuming effective communication and training programs are in place to inform employees about new regulations and standards.
4.C Support professionalism in	Enhanced professionalisation of occupations within the SCM value	Measure the percentage increase in the number of professionals within the SCM value chain obtaining relevant	Certification records, training attendance registers.	Comparative analysis of certification numbers over time, reports from training institutions.	Risk: Insufficient budget allocation may impede the implementation of

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
Supply Chain Management	chain in state organisations and public entities enhanced.	certifications or professional qualifications.			comprehensive training programs and certification initiatives.
		Measure improvements in key performance metrics related to SCM processes, such as reduced procurement cycle times, cost savings, and increased supplier performance.	Procurement records, performance reports.	Comparative analysis of performance metrics before and after professionalisation efforts.	Risk: Employees may resist changes to established processes, affecting the successful implementation of improvements. Assumption: Assuming effective change management strategies are in place to address potential resistance.
	Compulsory training programme for senior management and accounting officers on SCM.	Percentage increase in the completion rate of the compulsory SCM training program among senior management and accounting officers.	Training program attendance records, completion certificates.	Analysis of attendance data compared to the total number of targeted participants.	Risk: Lack of interest or motivation among senior management. Assumption: Clear communication of the benefits of the training program.
		Improvement in the application of SCM principles, as measured by reduced irregularities in procurement processes.	Audit reports, internal reviews, and compliance assessments.	Analysis of audit findings, internal reviews, and compliance assessments pre- and post-training.	Risk: Resistance to change in existing procurement practices. Assumption: Adequate post-training support and mentorship.
PILLAR 5 - STRONG ANTI-CORRUPTION AGENCIES (Focus - Strengthen the resourcing, coordination, transnational cooperation, performance and independence of dedicated anti-corruption agencies)					
5.A Strengthen South Africa's relationships with other countries in the fight against corruption.	Improved bilateral cooperation, support and coordination between South Africa and other countries.	Number of new bilateral agreements signed between South Africa and other countries related to anti-corruption efforts.	Official government statements, signed agreements, diplomatic releases.	Review of official documents and communications.	Risk: Political or diplomatic challenges in negotiation. Assumption: Willingness of partner countries to engage in anti-corruption cooperation.
		Percentage increase in the exchange of information and intelligence on cross-border corruption cases.	Reports on information exchange, joint investigation outcomes.	Comparative analysis of information exchange activities over time.	Risk: Sensitivity of shared information. Assumption: Establishment of secure communication channels.
	Improved relations with respect to extradition and mutual legal assistance.	Number of successful extradition requests granted by partner countries.	Extradition request records, diplomatic releases.	Analysis of extradition outcomes, diplomatic correspondence.	Risk: Legal barriers in partner countries. Assumption: Clear legal frameworks supporting extradition requests.
		Reduction in the time taken to process mutual legal assistance requests.	Records of mutual legal assistance requests, processing time reports.	Analysis of processing times for requests over time.	Risk: Administrative delays. Assumption: Streamlined procedures for mutual legal assistance.
5.B Establish an anti-corruption coordinating body to	Full-time secretariat appointed to support National Anti-Corruption Advisory Council (NACAC)	Successful establishment and functioning of a full-time secretariat for NACAC.	Secretariat establishment documentation, operational reports.	Analysis of official documents related to the secretariat's formation and reports on its operational activities.	Risk: Administrative and logistical challenges during the establishment phase.

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
coordinate all anti-corruption activities[1]					Assumption: Adequate budget allocation and support for the secretariat.
	National Anti-Corruption Advisory Council (NACAC), established, comprising representatives from all sectors of society	Successful establishment and inauguration of NACAC with representatives from all sectors of society.	List of representatives	Review of official documents and representation lists.	Risk: Challenges in securing representation from all sectors. Assumption: Inclusive and transparent nomination and selection process.
	Performance and functioning of the current AC mechanisms and functions reviewed and strengthened	Percentage improvement in the efficiency and effectiveness of the current anti-corruption mechanisms and functions.	Reports from the review process, evaluation assessments, key performance indicators.	Analysis of performance indicators and evaluation reports.	Risk: Resistance to change within existing structures. Assumption: Adequate support for proposed improvements.
	Overarching body established to coordinate all anti-corruption activities	Successful establishment and operationalisation of the overarching body for coordinating all anti-corruption activities.	Coordinating body establishment documentation, operational reports.	Analysis of official documents related to the establishment and reports on its operational activities.	Risk: Administrative and logistical challenges during the establishment phase. Assumption: Adequate budget allocation and political support for the coordinating body.
5.C Resource anti-corruption agencies by undertaking capacitation, training and modernisation of methodology and human resource for improved law enforcement	Systems for capturing and analysing relevant intelligence information and data on reported or suspected cases of corruption improved	Percentage improvement in the efficiency and effectiveness of intelligence information systems.	System performance reports, analysis of intelligence outcomes.	Evaluation of system performance against key indicators.	Risk: Technological challenges and resistance to system changes. Assumption: Sufficient budget allocation and technological support.
	Use of intelligence products and advisories in corruption matters improved	Increase in the percentage of corruption cases successfully prosecuted with the aid of intelligence products.	Prosecution records, intelligence product utilization reports.	Comparative analysis of case outcomes with and without intelligence product support.	Risk: Legal challenges in admitting intelligence products as evidence. Assumption: Adequate legal framework supporting the use of intelligence products.
	Advanced skills development programmes for investigators and prosecutors implemented	Percentage increase in the number of investigators and prosecutors with advanced skills in economic and financial crime and cybercrime.	Training program records, skills assessment reports.	Analysis of training completion and skills assessment results.	Risk: Resistance to advanced training due to workload. Assumption: Clear understanding of the benefits of advanced skills in tackling sophisticated crimes.
	Enhanced investigative capacity in sophisticated economic and financial crime, and cybercrime	Percentage increase in successful investigations and prosecutions resulting from specialised training and mentoring.	Investigation and prosecution reports, mentoring and coaching program evaluations.	Analysis of outcomes of cases handled by individuals who underwent specialized training and mentoring.	Risk: Limited availability of experienced mentors. Assumption: Commitment from experienced professionals to act as mentors.
5.D Safeguard the independence of key anti-corruption agencies responsible	Enhanced oversight of anti-corruption agencies through performance reporting and public scrutiny.	Regular and comprehensive performance reports submitted by anti-corruption agencies to relevant clusters, Parliament, and the public.	Performance reports, parliamentary records, public disclosure platforms.	Analysis of the frequency, completeness, and transparency of performance reports.	Risk: Resistance to public disclosure due to sensitive information. Assumption: Legal frameworks supporting transparent reporting.

Programme	Outcome indicator	Output Indicator	Data sources	Means of verification	Risks/Assumptions
for investigating and prosecuting corruption	Anti-corruption agencies receive adequate budgets	Percentage increase in the anti-corruption agency budget allocation compared to previous fiscal years.	Budget documents, financial reports.	Comparative analysis of budget allocations over time.	Risk: Budget constraints due to competing priorities. Assumption: Recognition of the importance of anti-corruption efforts in budgetary decisions.
		Timely disbursement of allocated budgets to anti-corruption agencies.	Budget documents, financial reports.	Analysis of budget disbursement timelines.	Risk: Administrative delays in budget disbursement. Assumption: Effective financial management systems.
PILLAR 6 - PROTECTION OF VULNERABLE SECTORS (Focus - Protect vulnerable sectors that are most prone to corruption and unethical practices with effective risk management)					
6.A Conduct research into public and private sectors vulnerable to corruption	Risk management framework developed to guide the assessment of vulnerable sectors	Successful development and implementation of a risk management framework for assessing vulnerable sectors.	Official documentation of the risk management framework, training records.	Review of the framework documentation and training records.	Risk: Resistance to adopting the framework. Assumption: Comprehensive stakeholder engagement during the framework development. Responsible
	Key industries, sectors and government departments at all three tiers and state-owned entities that are most vulnerable to corruption/exploitation identified	List of key industries, sectors, government departments, and state-owned entities identified as most vulnerable to corruption/exploitation.	Vulnerability assessment reports, stakeholder consultations.	Review of vulnerability assessment reports and stakeholder meeting minutes.	Risk: Reluctance to disclose vulnerabilities. Assumption: Incentives for honest reporting and collaboration.
	Comprehensive research undertaken into each of the identified areas regarded as most vulnerable to corruption, with recommendations to address risks	Completion of comprehensive research reports for each identified vulnerable area, including recommendations to address risks.	Research reports, recommendations documentation.	Analysis of research reports and associated recommendations.	Risk: Limited access to critical data for research. Assumption: Cooperation from stakeholders and data providers.
	Risk management framework developed to guide the assessment of vulnerable sectors	Implementation of recommended risk mitigation measures.	Progress reports on the implementation of recommendations.	Analysis of progress reports and outcomes.	Risk: Resistance to change within vulnerable sectors. Assumption: Adequate resources and commitment for implementation.

Appendix Three: Draft Implementation Plan for the National Anti-Corruption Strategy (2020-2030)

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
PILLAR 1 - CITIZEN PARTICIPATION (Focus - Promote and encourage active citizenry, whistleblowing, integrity, and transparency in all spheres of society.)							
Outcome 1A: Active citizenry empowered through advocacy campaigns on anti-corruption, governance matters; and the negative effects of corruption	1.A. 1 Anti-corruption strategy launched via a broad-based multi-sectoral event	Strategy launched already					
	1.A.2 Develop a national communication plan to encourage values reorientation in society.	Number of communication channels (e.g., TV, radio, social media) used in the national communication plan.	Government communication offices. Media monitoring agencies. Reports from media outlets.	Reports from media monitoring tools	Risk: Limited access to certain channels in specific regions	TBD	GCIS
		Percentage increase in public awareness of the values reorientation campaign over time.	Pre and post-campaign surveys; Social media analytics; Website traffic and engagement metrics	Comparative analysis of survey results; Analytics tools for social media and website metrics	Assumption: Increased awareness leads to behavioural change.	TBD	TBD
		Surveys or polls measuring the perception of citizens towards values such as integrity, accountability, and transparency before and after the communication plan implementation.	Pre- and post-campaign surveys; Public opinion polls conducted by independent research organisations	Reports from independent research organisations	Assumption: Surveys accurately reflect public opinion Risk: Survey results may have inherent bias	TBD	TBD
	1.A.3 Develop programmes to promote enhanced understanding of citizens' rights	Number of programs or workshops conducted to	Program or workshop records from implementing agencies;	Attendance registers; Photos or videos from the events	Risk: Participants may not fully understand the information provided	TBD	Implementing agencies NGOs or CSOs conducting awareness programs

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		promote citizens' rights awareness. ⁴⁸	Participant feedback forms				Government departments involved in citizen rights education
		Percentage increase in citizens' awareness and understanding of their rights in targeted populations.	Pre and post-event surveys; Social media analytics for awareness campaigns	Comparative analysis of survey results; Social media engagement metrics	Risk: External factors impacting awareness levels.	Annually	Implementing agencies / departments
		Number of partnerships established with CSOs, educational institutions, or community groups to support the implementation of citizens' rights programs.	Partnership agreements and MOUs Meeting minutes documenting collaboration Reports on joint activities or initiatives	Documented evidence of signed agreements; Records of collaborative events or projects; Feedback from partners on the effectiveness of collaboration	Assumption: Partnerships lead to increased impact. Risk: Conflicting goals or interests among partner organisations.	TBD	TBD
	1.A.4 Implement education campaigns at all schools	Number of schools that have integrated education campaigns on values and citizens' rights into their curriculum.	School curriculum records; Reports from education department	Documentation of integrated campaigns in school curricula	Risk: Resistance or challenges in integrating new content into the curriculum.	Annual	Departments of Basic & Higher Education
		Percentage increase in students' knowledge and understanding of ethical values and citizens' rights.	Student surveys	Feedback from students through surveys	Risk: External factors affecting students' learning experiences.		
	1.A.5 Annual anti-corruption summit(s) hosted	Successful organisation and participation in annual anti-corruption summits.	Event documentation, attendance records, participant feedback.	Analysis of event documentation, attendance reports, and participant surveys.	Risk: Limited participation from key stakeholders. Assumption: Effective communication and promotion of the summit.		TBD

⁴⁸ As stated in the NACS IMF, "High-level concept and planning document signed off by NACAC"

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	1.A.6 National programme of government-supported public dialogues (involving focused engagements with civil society, communities (urban and rural), government, professional bodies, business, traditional leadership etc.) aimed at identifying and addressing the root causes and effects of corruption.	Number of government-supported public dialogues conducted.	Dialogue documentation, participant lists.	Analysis of records from conducted dialogues.	Risk: Lack of interest or participation from targeted groups. Assumption: Inclusive and transparent planning and execution of dialogues.	TBD	TBD
		Implementation of recommendations from public dialogues.	Progress reports on the implementation of dialogue recommendations.	Analysis of progress reports and outcomes.	Risk: Resistance to implementing recommendations. Assumption: Adequate resources and commitment for implementation.		Relevant Government Departments NACAC Implementation Oversight Committee
Outcome 1B: All stakeholders, across all sectors of society, work together towards a common goal of preventing and combating corruption within their spheres of influence; and people willingly report corruption because they understand the benefits of doing and whistleblowers feel protected and supported.	1.B.1 Research the feasibility of a central reporting agency / whistleblower agency, and if feasible establish such structure or mechanism.	Number of comprehensive feasibility studies conducted, outlining the potential benefits, challenges, and implementation requirements of a central reporting agency.	Feasibility study report	Review of completed feasibility study documents Records of stakeholder meetings and consultations	Assumption: Findings accurately represent potential benefits and challenges. Risk: Incomplete data or bias in the feasibility studies.	TBD	NACAC, DPSA/PSC
		Estimated budget and resources required for the establishment of the agency.	-	-	Risk: Unforeseen costs or changes in resource requirements.	TBD	Oversight bodies or government agencies monitoring the project
		Timeliness of the establishment of the central reporting agency in accordance with the recommended timeline from the feasibility studies.	Project timelines and milestones Progress reports and updates Stakeholder communication records	Review of project timelines against actual progress Documentation of achieved milestones	Risk: Delays due to unforeseen challenges or changes in project scope.	TBD	

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		Number of reported cases processed through the new central reporting mechanism.	Reports from the central reporting agency	Audits or reviews of case processing procedures	Risk: Backlogs or inefficiencies in case processing	TBD	NACAC
	1.B.2 Recommendations of whistleblower report implemented	Timeliness of implementing recommendations from whistleblower reports.	Whistleblower report documentation, implementation reports; Implementation timelines in the reports.	Analysis of the time taken to implement recommendations.	Risk: Delays in the decision-making process. Assumption: Adequate resources and commitment for timely implementation.	TBD	TBD
	1.B.3 Organisational policies and procedures to support whistle-blowers strengthened and training provided for HR officials. ⁴⁹	Number of organisations that have updated or strengthened their policies and procedures to encourage whistleblowing.	Updated policy documents; Internal audit or compliance reports	Review of updated policy documents; Audit reports on policy compliance	Assumption: Updated policies are effectively communicated and understood.	TBD	TBD
		Percentage increase in the number of reported cases within organisations after the implementation of the new policies.	Incident reporting records	Trends in reported cases over time	Assumption: Increased reporting indicates improved trust in the system.		
		Percentage of employees who have undergone training on whistleblowing policies and procedures.	Training attendance records Training evaluation surveys Training materials and curriculum documentation	Review of attendance records Analysis of training evaluation results	Risk: Inadequate training leading to misunderstandings or non-compliance		
		Level of satisfaction among employees with the provided training and support mechanisms.					

⁴⁹ In the NACS, this activity is worded as “Create a culture of whistleblowing, strengthen organisational policies and procedures, provide training for human resources officials to support whistleblowers, and for employees to promote it.”

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
Outcome 1C: Increased public participation and discourse on ethical conduct and a shift in the national consciousness towards societal reorientation to a values-based way of life evident in communities, workplaces, schools, higher education institutions and other civil society structures.	1.C.1 Include ethics and integrity courses in all higher education programmes	Number of higher education institutions that have integrated ethics and integrity courses into their curriculum.	Institutional curriculum documentation. Reports from the DBE/DHET or relevant higher education regulatory bodies.	Official curriculum documents from higher education institutions. Confirmation from regulatory bodies regarding the inclusion of ethics courses.	Risk: Resistance from institutions to integrate ethics courses. Assumption: Supportive policies or incentives encouraging institutions to incorporate ethics education.	TBD	
		Percentage increase in the enrolment of students in ethics and integrity courses over a specific period.	Enrolment records from higher education institutions. Student surveys on course selection and preferences.	Comparative analysis of enrolment data over the specified period. Surveys measuring student interest and motivation for selecting ethics courses.	Risk: Lack of student interest or awareness of the importance of ethics courses. Assumption: Effective communication and promotion of the value of ethics education.	TBD	TBD
	1.C.2 Companies/ organisations to commit to fair business practices through corporate integrity pledges	Number of companies/ organisations that have adopted corporate integrity pledges.	Corporate records and documentation; Self-reporting by companies/ organisations; Industry or sector-specific surveys and reports.	Review of the relevant reports	Risk: Reluctance to disclose or report on the adoption of integrity pledges. Assumption: Encouragement and recognition programs for companies adopting integrity pledges		Department of Trade, Industry and Competition
		Percentage of employees within organisations that have undergone training on the importance and implementation of corporate integrity pledges.	Employee training records; Training program documentation.	Analysis of employee training databases. Surveys or interviews with employees to assess training awareness	Risk: Limited participation or engagement in training programs. Assumption: Clear communication on the importance of integrity training and its benefits.		

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	1.C.3 Ensure an enabling environment for the media in the fight against corruption	Number of policies or initiatives implemented to safeguard media freedom and independence.	Government reports on media policies; Documentation from media organisations; Reports from media freedom organisations and NGOs.	Review of official government communications or policy documents; Reports and publications from media freedom organisations.	Risk: Limited transparency in reporting on policies. Assumption: Open and collaborative relationships between government, media organizations, and media freedom watchdogs.	TBD	GCIS, Relevant media organisations
		Percentage of journalists who report feeling safe and supported in covering corruption-related issues	Surveys and interviews with journalists. Reports from media organisations or unions.	Analysis of survey results measuring journalists' perceptions of safety and support. Confirmation from media organisations regarding internal feedback mechanisms.	Risk: Fear of retaliation leading to underreporting of concerns. Assumption: Implementation of effective whistleblower protection mechanisms and open channels for reporting.		
	1.C.4 Capacitate ethics and integrity management committees or forums across sectors	Number of established ethics and integrity management committees or forums across different sectors.	Documentation from relevant sectors or organisations; Reports from oversight bodies or regulatory agencies.	Review of official documents indicating the establishment of committees or forums. Confirmation from oversight bodies or regulatory agencies.	Risk: Lack of standardised reporting or inconsistent documentation. Assumption: Consistent reporting practices and transparency in the establishment of committees or forums.	TBD	TBD
		Percentage of key stakeholders within sectors who have received training on ethical practices and integrity management.	Training records from sectors or organisations. Reports from training programs or institutions. Self-reporting by sectors or organisations.	Analysis of training databases or records. Confirmation from training program providers. Surveys or interviews with key stakeholders on their training experiences.	Risk: Inadequate participation or engagement in training programs. Assumption: Effective communication and promotion of the importance of ethical practices and integrity training.		TBD

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		Number of reported cases of corruption within sectors before and after the establishment of ethics and integrity management committees.	Official reports on corruption cases. Documentation from oversight bodies or regulatory agencies.	Comparative analysis of reported cases before and after the establishment of committees.	Risk: Underreporting due to fear of retaliation. Assumption: Whistleblower protection mechanisms in place and trust in reporting systems.		TBD
Outcome 1D: Greater transparency and improved measures for providing access to information in all sectors, in particular about governance, that is, business, CSOs and political parties.	1.D.1 Review PAIA and strengthen oversight to improve compliance	Number of PAIA reviews conducted to identify areas for improvement.	Internal audit reports. Reports from the Information Regulator or oversight body. Documentation from public institutions.	Review of internal audit reports detailing PAIA reviews; Confirmation from the information regulator or oversight body; Documentation from public institutions indicating areas identified for improvement.	Risk: Lack of comprehensive internal reviews. Assumption: Commitment to transparency and continuous improvement, resulting in thorough internal reviews.	TBD	TBD
		Number of reported cases where PAIA has been used to request and obtain information.	PAIA request records from public institutions. Reports from the Information Regulator or oversight body. Documentation from public institutions.	Analysis of PAIA request databases or records. Confirmation from the information regulator or oversight body. Documentation from public institutions detailing instances where PAIA was used to obtain information	Risk: Underreporting of cases where PAIA was used. Assumption: Effective and transparent reporting mechanisms in place, and awareness of the importance of reporting such cases.		
	1.D.2 Improve administrative systems to reinforce oversight functions	Number of identified weaknesses in the current administrative systems addressed and resolved.	Audit reports; Reports from oversight bodies or regulatory agencies; Documentation from improvement initiatives.	Review of internal audit reports and improvement project documentation. Confirmation from oversight bodies or regulatory agencies. Comparative analysis of reported weaknesses before and after improvement initiatives.	Risk: Inadequate reporting or identification of weaknesses. Assumption: Thorough and transparent internal reporting practices, and a commitment to addressing weaknesses.	TBD	PAIA Compliance Officers, oversight bodies, Department of Justice, and Constitutional Development

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		Feedback from oversight bodies or agencies regarding the effectiveness of the improved administrative systems.	Reports or communications from oversight bodies. Surveys or interviews with oversight bodies.	Analysis of reports or communications indicating the effectiveness of improved systems. Surveys or interviews with oversight bodies assessing the impact of administrative system improvements	Risk: Limited or biased feedback. Assumption: Open and honest communication channels, and a collaborative relationship with oversight bodies.		
	Government administrative systems (including record-keeping and archiving) reformed, digitised and data integrity management improved to reinforce and support oversight functions (i.e. Public Audit Act, PAIA, PAJA & POPI); and improve availability and quality of data on corruption matters. ⁵⁰	Percentage increase in the accuracy and completeness of available data.	Comparative analysis of data accuracy and completeness over time; Internal data quality reports. User feedback or complaints related to data accuracy and completeness.	Data quality assessments comparing the accuracy and completeness of data at different time points; Internal reports on data quality measures; User feedback surveys or interviews assessing perceived improvements.	Risk: Inaccurate or biased self-reporting on data quality. Assumption: Transparent reporting practices and a commitment to data accuracy and completeness	TBD	NACAC (DPSA - OGP?)
		Number of data sources integrated to create a comprehensive dataset.	Documentation on data integration initiatives; Reports on the establishment of comprehensive datasets; Stakeholder communications on integrated data sources.	Review of documentation related to data integration projects; Reports detailing the creation of comprehensive datasets; Communication records indicating collaboration with various data sources.	Risk: Limited collaboration or resistance from data sources. Assumption: Willingness and cooperation from various data sources to contribute to the integrated dataset.		
	1.D.4 Establish Mechanisms to Provide Information on 'Beneficial Ownership'	Number of mechanisms implemented to collect and disclose beneficial ownership information.	-	-	-	TBD	TBD
		Percentage of companies or entities that comply					

⁵⁰ Currently not tracked in the Excel Spreadsheet

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		with the beneficial ownership disclosure requirements.					
	1.D.7 Improve transparency in governance through professional guidelines, information campaigns and communication on successes, e.g. arrests/ convictions, and the consequences of corruption	Number of professional guidelines established and adopted for transparent governance.	-	-	-	TBD	TBD
		Effectiveness of information campaigns measured through public awareness surveys.					
		Number of communication channels used to share successes in anti-corruption efforts and consequences of corruption.					
	1.D.5 Strengthen Compliance with Private Sector Reporting of Corruption	Number of private sector organisations with established reporting mechanisms for corruption.	Internal reports from private sector organizations. Compliance documentation indicating the establishment of reporting mechanisms.	Review of internal reports detailing the establishment of reporting mechanisms. Confirmation through compliance documentation or policies.	Risk: Underreporting due to lack of transparency. Assumption: Commitment to transparency and adherence to reporting standards.		
		Percentage increase in reported cases from the private sector.	Internal records of reported cases. External reports or publications highlighting reported cases.	Comparative analysis of reported cases over specific periods. Cross-referencing internal records with external reports for validation.	Risk: Underreporting due to fear of consequences. Assumption: Effective whistleblower protection mechanisms in place.		
		Effectiveness of support mechanisms provided to	Whistleblower protection program documentation.	Analysis of documentation outlining support mechanisms.	Risk: Inadequate support leading to underutilization of reporting mechanisms.		

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		whistleblowers from the private sector.	Surveys or feedback mechanisms assessing whistleblower satisfaction.	Surveys or interviews with whistleblowers to gauge their satisfaction and perceived effectiveness of support.	Assumption: Regular assessments and improvements in support mechanisms based on feedback.		
	1.D.6 Improve Transparency in Political Party Funding	Percentage of political parties that disclose their sources of funding.	Financial reports or disclosures from political parties. Publicly available documentation on political party funding.	Review of financial reports or disclosure documents provided by political parties. Cross-referencing publicly available information on political party funding.	Risk: Incomplete or selective disclosure by political parties. Assumption: Implementation of regulatory measures ensuring comprehensive and accurate disclosure.	Independent Electoral Commission (IEC), political parties, oversight bodies.	
		Number of regulatory measures or policies implemented to enhance transparency in political party funding.	Government reports or official documentation on regulatory measures. Reports from oversight bodies or regulatory agencies.	Review of official government reports detailing implemented regulatory measures. Confirmation from oversight bodies or regulatory agencies.	Risk: Inadequate enforcement of regulatory measures. Assumption: Commitment to effective enforcement and regular assessments of regulatory compliance.		
PILLAR 2 - PROFESSIONAL CONDUCT (Focus - Advance the professionalisation of employees to optimise their contribution to create corruption-free workplaces.)							
Outcome 2A: Support professionalisation of the public sector by giving effect to Chapter 13 of NDP	2.A.1 Reform appointment processes for public officials	Number of reforms implemented in the appointment processes for public officials.	Official government reports on reforms in appointment processes. Documentation from relevant government agencies.	Comparative analysis of appointment processes before and after reforms. Review of official government reports outlining specific reforms.	Risk: Inadequate documentation or reporting on implemented reforms. Assumption: Transparent reporting practices and a commitment to detailing reforms.		

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	2.A.2 Implement competency assessments for public officials	Number of competency assessment programs implemented for public officials.	Documentation on competency assessment programs. Reports from government agencies overseeing competency assessments.	Analysis of documentation detailing the establishment and implementation of competency assessment programs. Confirmation from relevant government agencies.	Risk: Limited implementation or effectiveness of competency assessments. Assumption: Ongoing evaluations and adjustments to improve the effectiveness of competency assessments.		
	2.A.3 Implement graduate recruitment for key professions in the public sector	Percentage increase in the number of graduates recruited for key professions.	Human resources records on graduate recruitment. Reports from government agencies on recruitment strategies.	Comparative analysis of the number of graduates recruited over specific periods. Review of government reports on strategies and initiatives for recruiting graduates.	Risk: Insufficient recruitment strategies to attract graduates. Assumption: Implementation of targeted and effective recruitment strategies.		
		Evaluation of the impact of graduate recruitment on the diversity and skill set of the public sector workforce.	Diversity and skill set assessments of the public sector workforce. Surveys or evaluations of the impact of graduate recruitment.	Analysis of workforce diversity and skill set data before and after graduate recruitment initiatives.	Risk: Limited impact on diversity and skill set due to various factors. Assumption: Continuous adjustments to recruitment strategies to enhance impact.		
		Number of successful initiatives to retain and develop graduate recruits within the public sector	Reports on retention and development initiatives for graduate recruits. Feedback from graduate recruits on their experiences.	Review of official reports on successful retention and development initiatives.	Risk: High turnover rates among graduate recruits. Assumption: Implementation of effective retention and development initiatives based on feedback and assessments.		

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
Outcome 2B: Enhance the capacity and integrity of the professions central to anti-corruption efforts.	2.B.1 Specialised training and development for the professions central to anti-corruption	Number of specialised training programs developed and implemented for professionals central to anti-corruption (e.g., law enforcement, auditors, investigators).	Training records from relevant institutions, feedback from participants, reports from training providers				Anti-corruption agencies, law enforcement training academies, professional development institutions.
		Number of reported cases of corruption successfully handled by professionals who received specialised training					
	2.B.2 Develop ethics curricula for the professions	Number of professions with developed and integrated ethics curricula.	Curricula documents	Surveys of professionals, reports from professional associations			Education and training institutions, professional associations, government bodies overseeing education standards.
		Percentage increase in professionals reporting awareness and understanding of ethical principles within their curricula.					
	2.B.3 Improve ethical standards in professional associations	Number of professional associations that have updated or strengthened their ethical standards.	Codes of ethics, membership surveys, reports of disciplinary actions.	Review existing reports			Professional associations, regulatory bodies overseeing professional standards, ethics committees.
		Number of professional associations that have					

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		updated or strengthened their ethical standards.					
PILLAR 3 - ETHICAL GOVERNANCE WITH OVERSIGHT AND CONSEQUENCE MANAGEMENT (Focus - Enhance governance, oversight, and consequence management in organisations)							
Outcome 3A: Enhance ethical leadership across sectors	3.A.1 Expand director development programmes to enhance good governance and build the ethics competency of board members in private sector and SOEs.	Percentage increase in the participation of board members in director development programs.	Attendance registers for development programs, completion certificates, feedback surveys				Institute of Directors in Southern Africa (IoDSA), Private Sector Governance Forums, SOE Boards
	3.A.2 Strengthen ethics frameworks for politicians	Adoption and implementation of strengthened ethics frameworks for politicians.	Documentation of updated ethics frameworks, reports on training sessions, compliance assessments.				Ethics Committees in Parliament and Provincial Legislatures, Office of the Public Protector, Political Party Ethics Committees
	Institute leadership awards for anti-corruption work. ⁵¹	Number of leadership awards instituted and presented for outstanding anti-corruption work.	Records of award ceremonies, media coverage, testimonials from awardees.				Anti-Corruption Agencies, Civil Society Organisations, Private Sector Associations.

⁵¹ In the NACS IMF this is phrased as “Annual awards that recognises ethical leadership and integrity initiatives. These awards could be hosted by civil society organisations working to promote public ethics and accountability.”

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	Initiate a public dialogue in rural areas on integrity and accountability relevant to traditional leadership.	Number of public dialogues held in rural areas, with a focus on traditional leadership	Records of public dialogue sessions, attendance registers, media coverage, feedback forms.	Review records and assess feedback forms			Department of Traditional Affairs, Provincial Houses of Traditional Leaders, Civil Society Organizations.
	3.A.4 Develop mechanisms to enhance accountability and compliance by Accounting Officers and Accounting Authorities	Number of mechanisms developed and implemented to enhance accountability and compliance.	Documentation of new mechanisms, reports on compliance assessments, disciplinary records	Review evidence from the documentation			National Treasury, Auditor General's Office, Department of Public Service and Administration.
Outcome 3B: Strengthen oversight and governance capacity in the public sector.	3.B.1 Assessment conducted to determine how Constitutional and other oversight bodies can be strengthened (e.g. AGSA, Public Protector, IPID etc.) and recommendations implemented	Percentage of Implemented Recommendations from Oversight Bodies' Strengthening Assessment	Reports documenting the recommendations made during the assessment. Progress reports outlining the status of the implementation of each recommendation.	Stakeholder consultations to gather feedback on the perceived effectiveness of the implemented recommendations.	Risk: Incomplete or delayed implementation of recommendations. Assumption: Adequate resources and commitment from relevant authorities for timely implementation.		
	3.B.2 Local Government Anti-Corruption Strategy and relevant provincial strategies implemented	Percentage of Local Government Anti-Corruption Strategy Implemented	Implementation progress reports from local government authorities. Internal assessments and evaluations measuring the implementation status.	Review of progress reports outlining the actions taken to implement the strategy; Internal assessments comparing the intended actions with the actual implemented measures; Surveys or interviews with stakeholders to gauge their perception of the strategy's implementation.	Risk: Overstated reports on the level of implementation. Assumption: Transparency and integrity in reporting practices, verified through internal and external assessments.		Municipal Oversight Committees, Provincial COGTA

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	3.B.3 Capacity and performance of municipal oversight functions in the local government sphere improved	Level of enhancement in the capacity and effectiveness of oversight functions in the local government sphere improved.	Reports on the implementation of capacity-building initiatives, assessments of oversight bodies' performance, feedback from stakeholders.	Assess trends in documentation of capacity-building initiatives, including training materials, session plans, and participant feedback.	Risk: Oversight bodies providing incomplete or biased reports Assumption: That participation in training programs directly translates to improved capacity.		Municipal Oversight Committees, Provincial COGTA
Outcome 3C: Strengthen ethics and integrity promotion across sector	3.C.1 Enhance adherence to ethics requirements of the Public Service Regulations and other legislation regulating the conduct of employees of the state and public representatives.	Percentage increase in the completion of ethics training by public service employees.	Training records, employee surveys on ethics awareness	Analysis of training records and data from surveys	Risk: Incomplete or inaccurate training records. Assumption: That completion of training equates to a genuine understanding of ethical principles.		Public Service Commission, Ethics Officers in government departments.
	3.C.2 Requirements of the Public Service Regulations and other legislation regulating ethics, the conduct of employees of the state and public representatives implemented.	Mechanisms to identify and track public service employees conducting business with the State put in place	MoU outlining the roles of the DPSA, SAPS, DOJ and NPA in dealing with this issue.	Analysis of number of matters identified and reported to SAPS	Risk: Data from CIPC on public servants who are doing business may be outdated Assumption: That stakeholders will conduct the identification process efficiently		DPSA, DOJ, NPA, CIPC
	3.C.3 Database developed and administered by the DPSA of all public sector officials found guilty of	Level of implementation of the database	Reports on updates, additions, or removals from the database. Audits of the database to ensure data accuracy and security.	Review of access logs and user activity records. Regular reports on database updates and maintenance.	Assumption: Database administration procedures are effective and secure. Risk: Unauthorised access, data breaches, or inaccurate information.		Public Service Commission

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	fraud, corruption or other white-collar crimes. ⁵²			Independent audits of the database to verify accuracy and compliance.			
	3.C.4 Integrity testing and lifestyle audits framework finalised, and processes implemented (starting with senior officials involved in tender processes, supply-chain management officials, members of boards of SOEs)	Framework drafted and finalised for implementation	Drafts and versions of integrity testing and lifestyle audits framework	Review of the finalised framework documents; feedback from stakeholders involved in the consultation process.	Assumption: Framework is comprehensive and aligns with ethical standards. Risk: Lack of stakeholder consensus or understanding of the framework.	TBD	.
		Framework implemented according to set timelines	Reports on implementation of framework	Review the recommendations and gaps in implementation were possible	Risk: Poor quality of reports on implementation		
	3.C.5 Undertake training and capacity-building in the public sector to promote an enhanced understanding of key legislation relevant to anti-corruption.	Percentage increase in employees reporting an enhanced understanding of legislation and ethics principles.	Training records, assessments of legislative knowledge.	Pre- and post-training assessments,			National School of Government, Department of Public Service and Administration
	3.C.6 Provide holistic employee wellness programmes in the public sector.	Employee satisfaction levels with wellness programs	Employee surveys, wellness program participation records				
	3.C.7 Implementation of integrity promotion measures included as indicator in the	Percentage of employees with integrity-related key performance indicators (KPIs) integrated into	Performance appraisal records, employee surveys.				Public sector unions, Department of Labour, Department of Public

⁵² At local government level, CoGTA should maintain a similar database. These databases must be consulted before appointments are made.

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	performance management contracts of senior managers in all sectors	their performance assessments.					Service and Administration.
Outcome 3D: Strengthen Accountability and programme management in organisations across sectors.	3.D.1 Research project focused on the development of anti-corruption architecture and investigative capacity in the public sector.	Research report of good quality and relevance produced.	Final report and recommendations	Expert reviews, feedback from key stakeholders.	Assumption: The chosen criteria for quality assessment are relevant to the goals of the research. Risk: Biases in the review process may impact the objectivity of the assessment.		
	3.D.2 Improve the integrity of the disciplinary process in the public sector.	Reduction in the average time taken to conclude disciplinary cases.	Disciplinary case records, including timeframes for each case.	Comparative analysis of disciplinary case durations before and after interventions.	Risk: Legal complexities may prolong disciplinary processes.		DPSA, PSC
	3.D.2 Develop an accountability framework for professions.	Adoption and implementation of accountability frameworks in targeted professions.	Documentation of accountability frameworks developed and adopted.	Reports on the integration of accountability frameworks into professional standards.	Risk: Resistance from professional bodies.		
	3.D.3 Develop an anti-corruption compliance culture in private companies and state-owned entities.	Percentage increase in private companies and state-owned entities with established anti-corruption compliance programs.	Self-assessment reports from companies and entities.	Documentation of anti-corruption policies, training programs, and compliance measures.	Risk: Lack of commitment from leadership. Assumption: Legal requirements and incentives for compliance are in place.		

PILLAR 4 - CREDIBLE, TRANSPARENT PROCUREMENT SYSTEM
(Focus - Improve the integrity and credibility of the public procurement system)

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
4.A Enhance oversight and enforcement in public procurement.	4.A.1 Strengthen regulatory and enforcement capacity in government to ensure adherence to the relevant legislation, policies and procedures regulating financial conduct and procurement.	Percentage increase in the number of government agencies with strengthened regulatory and enforcement capacity.	Annual reports from relevant government agencies, audit reports.	Comparison of current capacities with baseline data; reports from external audit agencies.	Risk: Resistance to change within government agencies. Assumption: Adequate budget allocation for capacity-building.		NACAC
	4.A.5 Incentivise and support whistleblowing on illegal conduct in the public procurement system.	Number of whistleblowing reports received and acted upon in the public procurement system.	Official complaint databases.	Analysis of reported cases, investigation outcomes	Risk: Fear of retaliation affecting reporting accuracy. Assumption: Effective whistleblower protection mechanisms are in place.		
	4.A.2 Enhance business integrity in large procurement contracts, e.g. the introduction of cross-sectoral integrity pacts. ⁵³	Number of cross-sectoral integrity pacts implemented in large procurement contracts.	Records of implemented integrity pacts, procurement databases.	Documentation of integrity pact implementation, procurement contract reviews.	Risk: Lack of commitment from private sector entities. Assumption: Clear legal frameworks supporting integrity pacts.		
4.B Improve transparency and data management in public procurement.	4.B.1 Establish an integrated digital financial and procurement management system	Percentage increase in the adoption of the integrated digital financial and procurement management system among relevant	User registration and login records, system usage analytics.	System-generated reports on user activity, feedback from system administrators and users.	Risk: Resistance to digital transformation. Assumption: Sufficient training and support for system users.		Relevant Procurement and Finance Departments.

⁵³ Processes to restrict, debar, or blacklist individuals and businesses found to have transgressed legislation relevant to procurement or financial accountability strengthened.

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		government departments and agencies. ⁵⁴					
	4.B.2 Develop public education tools to support accountability	Measure the reach of public education tools by tracking the number of individuals exposed to the tools and their level of engagement (e.g., views, downloads, interactions).	Analytics data from online platforms, download statistics, attendance records for physical events.	Reports from communication and education teams, online platform analytics.	Risk: Limited public engagement. Assumption: Assuming effective communication and training programs are in place to inform employees about new regulations and standards.		DPSA, GCIS, relevant communication and media units of responsible departments / entities.
4.C Support professionalism in Supply Chain Management	4.C.1 Professionalisation of occupations within the SCM value chain in state organisations and public entities enhanced.	Measure the percentage increase in the number of professionals within the SCM value chain obtaining relevant certifications or professional qualifications.	Certification records, training attendance registers.	Comparative analysis of certification numbers over time, reports from training institutions.	Risk: Insufficient budget allocation may impede the implementation of comprehensive training programs and certification initiatives.		SCM Training Institutes, Certification Bodies, government human resources departments.
		Measure improvements in key performance metrics related to SCM processes, such as reduced procurement cycle times, cost savings, and increased supplier performance.	Procurement records, performance reports.	Comparative analysis of performance metrics before and after professionalisation efforts.	Risk: Employees may resist changes to established processes, affecting the successful implementation of improvements. Assumption: Assuming effective change management strategies		SCM Units, Performance Management Units, Oversight Bodies.

⁵⁴ An alternative indicator can be Percentage increase in transparency scores as measured by open governance and open contracting indices. Data Source: Open governance reports, open contracting databases e.g. Gauteng has tried this.

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
					are in place to address potential resistance.		
	4.C.2 Develop a compulsory training programme for senior management and accounting officers on SCM.	Percentage increase in the completion rate of the compulsory SCM training program among senior management and accounting officers.	Training program attendance records, completion certificates.	Analysis of attendance data compared to the total number of targeted participants.	Risk: Lack of interest or motivation among senior management. Assumption: Clear communication of the benefits of the training program.		National School of Government or relevant training institution
		Improvement in the application of SCM principles, as measured by reduced irregularities in procurement processes.	Audit reports, internal reviews, and compliance assessments.	Analysis of audit findings, internal reviews, and compliance assessments pre- and post-training.	Risk: Resistance to change in existing procurement practices. Assumption: Adequate post-training support and mentorship.		
PILLAR 5 - STRONG ANTI-CORRUPTION AGENCIES (Focus - Strengthen the resourcing, coordination, transnational cooperation, performance and independence of dedicated anti-corruption agencies)							
5.A Strengthen South Africa's relationships with other countries in the fight against corruption.	5.A.1 Improve bilateral cooperation, support and coordination between South Africa and other countries.	Number of new bilateral agreements signed between South Africa and other countries related to anti-corruption efforts.	Official government statements, signed agreements, diplomatic releases.	Review of official documents and communications.	Risk: Political or diplomatic challenges in negotiation. Assumption: Willingness of partner countries to engage in anti-corruption cooperation.		Department of International Relations and Cooperation

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		Percentage increase in the exchange of information and intelligence on cross-border corruption cases.	Reports on information exchange, joint investigation outcomes.	Comparative analysis of information exchange activities over time.	Risk: Sensitivity of shared information. Assumption: Establishment of secure communication channels.		
	5.A.2 Improve relations with respect to extradition and mutual legal assistance.	Number of successful extradition requests granted by partner countries.	Extradition request records, diplomatic releases.	Analysis of extradition outcomes, diplomatic correspondence.	Risk: Legal barriers in partner countries. Assumption: Clear legal frameworks supporting extradition requests.		National Prosecuting Authority Department of Justice and Constitutional Development
		Reduction in the time taken to process mutual legal assistance requests.	Records of mutual legal assistance requests, processing time reports.	Analysis of processing times for requests over time.	Risk: Administrative delays. Assumption: Streamlined procedures for mutual legal assistance.		
5.B Establish an anti-corruption coordinating body to coordinate all anti-corruption activities⁵⁵	5.B.1 Full-time secretariat appointed to support National Anti-Corruption Advisory Council (NACAC)	Successful establishment and functioning of a full-time secretariat for NACAC.	Secretariat establishment documentation, operational reports.	Analysis of official documents related to the secretariat's formation and reports on its operational activities.	Risk: Administrative and logistical challenges during the establishment phase. Assumption: Adequate budget allocation and support for the secretariat.		NACAC
	5.B.2 National Anti-Corruption Advisory Council (NACAC), established, comprising representatives from all sectors of society	Successful establishment and inauguration of NACAC with representatives from all sectors of society.	List of representatives	Review of official documents and representation lists.	Risk: Challenges in securing representation from all sectors. Assumption: Inclusive and transparent nomination and selection process.		

⁵⁵ The Act mentions the following activities: (i) Improve bilateral cooperation, support and coordination between South Africa and other countries; (ii) Improve relations with respect to extradition and mutual legal assistance.

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	5.B.3 Performance and functioning of the current AC mechanisms and functions reviewed and strengthened	Percentage improvement in the efficiency and effectiveness of the current anti-corruption mechanisms and functions.	Reports from the review process, evaluation assessments, key performance indicators.	Analysis of performance indicators and evaluation reports.	Risk: Resistance to change within existing structures. Assumption: Adequate support for proposed improvements.		NACAC Working Group on Mechanisms Review External Evaluation Committee
	5.B.4 Overarching body established to coordinate all anti-corruption activities	Successful establishment and operationalisation of the overarching body for coordinating all anti-corruption activities.	Coordinating body establishment documentation, operational reports.	Analysis of official documents related to the establishment and reports on its operational activities.	Risk: Administrative and logistical challenges during the establishment phase. Assumption: Adequate budget allocation and political support for the coordinating body.		
5.C Resource anti-corruption agencies by undertaking capacitation, training and modernisation of methodology and human resource for improved law enforcement	5.C.1 Systems for capturing and analysing relevant intelligence information and data on reported or suspected cases of corruption improved	Percentage improvement in the efficiency and effectiveness of intelligence information systems.	System performance reports, analysis of intelligence outcomes.	Evaluation of system performance against key indicators.	Risk: Technological challenges and resistance to system changes. Assumption: Sufficient budget allocation and technological support.		
	5.C.2 Use of intelligence products and advisories in corruption matters improved	Increase in the percentage of corruption cases successfully prosecuted with the aid of intelligence products.	Prosecution records, intelligence product utilization reports.	Comparative analysis of case outcomes with and without intelligence product support.	Risk: Legal challenges in admitting intelligence products as evidence. Assumption: Adequate legal framework supporting the use of intelligence products.		ACTT
	5.C.3 Advanced skills development programmes for	Percentage increase in the number of investigators and	Training program records, skills assessment reports.	Analysis of training completion and skills assessment results.	Risk: Resistance to advanced training due to workload.		National School of Government or relevant training institution; ACTT

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	investigators and prosecutors implemented	prosecutors with advanced skills in economic and financial crime and cybercrime.			Assumption: Clear understanding of the benefits of advanced skills in tackling sophisticated crimes.		
	5.C.4 Specialised training, with supportive mentoring and coaching programmes, provided to investigators in the field of sophisticated economic and financial crime as well as cybercrime	Percentage increase in successful investigations and prosecutions resulting from specialized training and mentoring.	Investigation and prosecution reports, mentoring and coaching program evaluations.	Analysis of outcomes of cases handled by individuals who underwent specialized training and mentoring.	Risk: Limited availability of experienced mentors. Assumption: Commitment from experienced professionals to act as mentors.		ACTT
5.D Safeguard the independence of key anti-corruption agencies responsible for investigating and prosecuting corruption	5.D.1 Effective oversight of anti-corruption agencies through direct performance reporting to the relevant clusters, Parliament and through public scrutiny undertaken by civil society and members of the public.	Regular and comprehensive performance reports submitted by anti-corruption agencies to relevant clusters, Parliament, and the public.	Performance reports, parliamentary records, public disclosure platforms.	Analysis of the frequency, completeness, and transparency of performance reports.	Risk: Resistance to public disclosure due to sensitive information. Assumption: Legal frameworks supporting transparent reporting.		Anti-Corruption Agencies Parliamentary Oversight Committees Civil Society Organizations
	5.D.2 Anti-corruption agencies receive adequate budgets	Percentage increase in the anti-corruption agency budget allocation compared to previous fiscal years.	Budget documents, financial reports.	Comparative analysis of budget allocations over time.	Risk: Budget constraints due to competing priorities. Assumption: Recognition of the importance of anti-corruption efforts in budgetary decisions.		

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
		Timely disbursement of allocated budgets to anti-corruption agencies.	Budget documents, financial reports.	Analysis of budget disbursement timelines.	Risk: Administrative delays in budget disbursement. Assumption: Effective financial management systems.		
PILLAR 6 - PROTECTION OF VULNERABLE SECTORS (Focus - Protect vulnerable sectors that are most prone to corruption and unethical practices with effective risk management)							
6.A Conduct research into public and private sectors vulnerable to corruption	6.A.1 Risk management framework developed to guide the assessment of vulnerable sectors	Successful development and implementation of a risk management framework for assessing vulnerable sectors.	Official documentation of the risk management framework, training records.	Review of the framework documentation and training records.	Risk: Resistance to adopting the framework. Assumption: Comprehensive stakeholder engagement during the framework development. Responsible		National Anti-Corruption Advisory Council (NACAC) Ministry of Justice and Constitutional Development
	6.A.2 Key industries, sectors and government departments at all three tiers and state-owned entities that are most vulnerable to corruption/exploitation identified	List of key industries, sectors, government departments, and state-owned entities identified as most vulnerable to corruption/exploitation.	Vulnerability assessment reports, stakeholder consultations.	Review of vulnerability assessment reports and stakeholder meeting minutes.	Risk: Reluctance to disclose vulnerabilities. Assumption: Incentives for honest reporting and collaboration.		NACAC Anti-Corruption Task Force
	6.A.3 Comprehensive research undertaken into each of the identified areas regarded as most vulnerable to corruption, with recommendations to address risks	Completion of comprehensive research reports for each identified vulnerable area, including recommendations to address risks.	Research reports, recommendations documentation.	Analysis of research reports and associated recommendations.	Risk: Limited access to critical data for research. Assumption: Cooperation from stakeholders and data providers.		Research Institutions; ACTT

Programme	Activity	Indicator	Data sources	Means of verification	Risks / Assumptions	Frequency	Responsible
	Risk management framework developed to guide the assessment of vulnerable sectors	Implementation of recommended risk mitigation measures.	Progress reports on the implementation of recommendations. ⁵⁶	Analysis of progress reports and outcomes.	Risk: Resistance to change within vulnerable sectors. Assumption: Adequate resources and commitment for implementation.		Relevant Government Departments / entities

⁵⁶ DPME uses Management Response Plans / Similarly the Auditor General has various report and feedback mechanisms for documenting and tracking institutional accountability

Appendix Four: Summary of Engagements

Meeting	Online/ In person	Date	Attendees	Summary
NACS monitoring framework workshop	Garden Court O.R. Tambo International Airport	18 October 2023	Kaas, Rabea GIZ ZA Ishreen Ismail, Mthente bschreiner@win-s.org jonathan@dpme.gov.za Maleka, Mokgapi GIZ ZA Kitshoff, Ruan GIZ ZA sekoetlane@mrphamodi.co.za shirley@dpme.gov.za Sindile Khani, Mthente victor@dpme.gov.za advocate.zolakhumalo@gmail.com andisiwe.mthatyana@dpsa.gov.za colette@1stintegrity.net colettefrancisashon@gmail.com gpienaar@hsrc.ac.za isaack@dpsa.gov.za mbekithandeka@gmail.com sinenhlanhla.tsekiso@wits.ac.za sunelleb@ssa.gov.za	Overview of the study's scope and approach. Presentation of the skeleton implementation plan, including goals, impact measures, activities, and outputs. Discussing the path forward.
MERL Workshop Debriefing	Online	20 October 2023	Kaas, Rabea GIZ ZA Ishreen Ismail, Mthente bschreiner@win-s.org Maleka, Mokgapi GIZ ZA ndolopi@sadt.org.za Kitshoff, Ruan GIZ ZA sekoetlane@mrphamodi.co.za shirley@dpme.gov.za Sindile Khani, Mthente	Formal debriefing and engaging in a collaborative discussion to determine the optimal path forward. a) Mthente to develop two revised key outputs using the implementation monitoring framework (IMF excel document): a results chain and a log frame. b) A draft of these outputs to be shared with the MERL Workstream and Reference Group for validation and inputs on the 14th of November. c) The aim is to finalize the templates by the end of November/mid-December, including pre-existing data from the old Excel IMF. d) The validation of the outputs will happen in January and possibly beyond, with virtual consultations held by Mthente with social partners defined by MERL/GIZ to fill gaps and verify/validate. d) The final report submitted by Mthente will include a history of framework development, the revision and validation process, key M&E terminologies, the revised and validated result chain and log frame, and recommendations for progress reporting, technical data collection tools, and incidental implementation handling/monitoring. e) A cost-neutral contract extension is suggested to complete the tasks with adequate diligence, with a new deadline for all final deliverables as the 31st of March 2024. f) Confirmation of agreement with the way forward and extension is requested by the 31st of October to initiate the contract amendment process.

Meeting	Online/ In person	Date	Attendees	Summary
NACS results chain draft	Online	21 November 2023	Kaas, Rabea GIZ ZA (rabea.kaas@giz.de) Organizer Diane Manuel-Oaker Ishreen Ismail Nedson Popphiwa Sindile Khani sunelleb@ssa.gov.za	Formal discussion of the Mthente draft for the NACS results chain and logical framework
Mthente update: Draft Implementation Framework	Email from Shirley Maboane	13 December 2023	Shirley@dpme.gov.za	Shirley provided feedback on the NACS implementation plan and an expressed intent to collaborate further to finalise the plan.
Mthente update: Draft Implementation Framework	Email from Sekoetlane Phamodi	21 December 2023	sekoetlane@mrphamodi.co.za	a) Sekoetlane identified areas for improvement, such as limitations in outcomes and indicators, and suggestions to get feedback. b) Proposal of sharing a "zero-draft" with the Reference Group for early feedback and suggestions of prioritising quality over speed. c) Acknowledgement of the need to integrate the frameworks activities but recommended on focusing on producing a quality record first.
Draft NACS implementation/monitoring	Online	22 January 2024	Kaas, Rabea GIZ ZA Ishreen Ismail, Mthente ndolopi@sadtu.org.za Nedson Popphiwa, Mthente sekoetlane@mrphamodi.co.za shirley@dpme.gov.za Sindile Khani, Mthente bschreiner@win-s.org Maleka, Mkgapi GIZ ZA Kitshoff, Ruan GIZ ZA	a) Sekoetlane provided feedback on the suggested changes and structure of the document. b) The most significant change is the inclusion of a section on M&E measures currently in place. c) Sekoetlane approved the suggested structure of the document.
NACS/Mthente update	Online	28 February 2024	Kaas, Rabea GIZ ZA Organizer Ishreen Ismail Nedson Popphiwa Sindile Khani	a) Feedback on the literature review b) Progress on outcome indicators (if any) c) Amendment of ToRs
NACS M&E Feedback	Online	29 April 2024	Kaas, Rabea GIZ ZA Ishreen Ismail, Mthente jonathan@dpme.gov.za	Feedback and suggestions on the literature on the final structure of the framework. On the literature review:

Meeting	Online/ In person	Date	Attendees	Summary
			Nedson Pophiwa, Mthente victor@dpme.gov.za	<ul style="list-style-type: none"> ❖ Validation and acknowledgement by DPME as a helpful basis for further M&E work <p>On the M&E framework:</p> <ul style="list-style-type: none"> ❖ Suggestion to hide two columns (one on responsibility and one on frequency). ❖ Suggestion to add the legislation relevant per outcome and to align it with the President's response to the Zondo report ❖ Suggestion to reduce number of indicators to a workable framework ❖ Suggestion to include FATF recommendations
NACS M&E Activities Alignment Workshop	Radisson Red Hotel, Cnr Oxford & Park, 4 Parks Blvd	14 May 2024	Maleka, Mokgapi GIZ ZA; Maleka, Mokgapi GIZ ZA; Gugu Thimane; Victor Naidu; Takunda Chirau; Sekoetlane Phamodi; Shirley Maboane; Jonathan Timm; Futhi Umlaw; Thokozani Mntungwa; Steven Masvaure; Silvia De Sousa; Kaas, Rabea GIZ ZA; Kitshoff, Ruan GIZ ZA; Mark Everett; Jardine, Aziz GIZ ZA; sgordon@hsrc.ac.za; Angela Bester; Shakilah Syed; Elphus Ndou; SUNELLE BRUWER; Nkosana Dolopi; Candice Morkel; tersia.lewis@un.org Cc: Tibane, Nomsa GIZ ZA; Faith Baloyi	Coordinate efforts and prepare for the transition of work from Mthente to CLEAR-AA, who will support Victor in his new role.