NACS
National
Anti-Corruption
Strategy

NATIONAL ANTI-CORRUPTION ADVISORY COUNCIL

Presents the

MID-TERM REPORT

To the President, The Cabinet & The Country

MAY 2024

BUILDING CULTURES

INTEGRITY

COLLECTIVE ACTION

AGAINST CORRUPTION

PREVENTION

CONSTITUTIONAL VALUES

PARTICIPATIVE DEMOCRACY

UBUNTU

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INTRODUCTION

This mid-term report describes the work and key milestones achieved by the National Anti-Corruption Advisory Council (NACAC) in executing its mandate, from its inception in September 2022 to March 2024.

The Council has been established to deepen the country's efforts to rid society and the administration of corruption, improve investor confidence, and secure higher levels of public trust. The Council will advise the government on critical preventive measures, institutional capabilities, and resources required to proactively curb a recurrence of state capture and to prevent fraud and corruption in South Africa. - President Cyril Ramaphosa, 29 August 2022

Part One of this report presents the Council's recommendations for the establishment of the Office of Public Integrity and Anti-Corruption, known as OPI, as a permanent, independent, overarching anti-corruption body, described in the National Anti-Corruption Strategy (NACS) 2020 -2030. **Part Two** describes the NACAC's work processes over its first 18 months, with particular emphasis on the key activities achieved in the implementation of the NACS. **Part Three** identifies critical areas of further research and engagements with relevant stakeholders to accelerate the next phase of the implementation of the Council's mandate.

Why this Mid-Term Report?

One of the principal tasks in terms of the mandate of the National Anti-Corruption Advisory Council (NACAC) is the formulation of a proposal to the President and Cabinet regarding the creation of a new, independent, overarching institution, to play a leading role in the nation's work against corruption, in collaboration with existing law enforcement agencies.

The rationale for the establishment of a new independent anti-corruption body to fight corruption is in direct response to South Africa's National Anti-Corruption Strategy (NACS), adopted by Cabinet on 18 November 2020. The NACS commits government to the establishment of "an independent statutory/constitutionally entrenched state body that will report to Parliament". [NACS sec. 6.4] NACS's strategic objective describes the key component of work for the Advisory Council as the "research, conceptual development and drafting of a proposal to Cabinet for the establishment of the overarching body" [NACS, sec. 6.4].

Further, the NACS envisions that:

This overarching body will drive strategy roll-out and coordinate all the anti-corruption activities in the country. It is premised on an integrated operational model with cross-sectoral collaboration, in line with the country's whole-of-government and societal approach to combating corruption. [NACS, Appendix H]

This strategic intent of the NACAC was reiterated by President Ramaphosa in his 2021 State of the Nation Address, where he explained that he is relying on the Council to "oversee the initial implementation of the strategy and the establishment of an independent statutory anti-corruption body that reports to Parliament".

Based on evidence from extensive research, engagements with critical stakeholders, and lessons learned from international study visits, the Council has proposed the establishment of a permanent, independent, overarching anti-corruption body; its powers, functions, and design strategically located in South Africa's institutional anti-corruption architecture, as promised in the National Anti-Corruption Strategy. The Council recognises that in the transitional phase, the details will be worked out and legislation drafted and debated, but those details and debates must follow our recommendations set out in this document on the design and authority of the permanent anti-corruption body.

The Council regards the establishment of a permanent anti-corruption body as urgent. The NACS, adopted in 2020, anticipated that "[i]t will take some time, possibly up to two years, before a permanent body will be in place, with the required legislation passed, and appointments and budgets finalised." Even if our recommendations in this document are accepted, we are lagging woefully behind on the imperative to have people and resources permanently in place. We have done all we can to get our recommendations to the President speedily, and to keep this report concise and actionable.

Still, the Council has not been rushed or hasty; we have been deliberate and consulted widely with critical stakeholders. The NACS instructs that our recommendations should be informed by "all relevant international, Constitutional and legislated obligations, and current capacities of existing structures... findings of various judicial commissions of inquiry... [and a] review of mandates and functioning of all existing institutions with anti-corruption mandates... " Moreover, the NACS urges us to engage with the public, with all stakeholders, and "with relevant inter-ministerial committees, clusters, and social partners". [NACS, executive summary, table 1].

We have done all this and more. We have reviewed South Africa's international obligations and we have discussed various options with the heads of the various criminal justice institutions handling corruption cases at different stages. We have met with the leadership of the Public Service Commission, with the Forum of South African Directors-General (FOSAD) across government, and many more heads of relevant departments. We have been guided by the international standards for anti-corruption bodies known as the Jakarta Principles, and we have studied the Constitutional Court's judgments in the Glenister cases.

Suffice it to say here, by way of introduction, that we have benefitted greatly from the input of the leadership and professional staff of the many existing institutions that share responsibility for anti-corruption activities, and from the wisdom of scholars, civil society advocates, and those with comparative international experience. We have learned much from visits undertaken to Nairobi and Hong Kong, allowing us to interact with institutions – new and old – that have tackled related challenges across our continent and elsewhere in the world.

We are especially grateful for the experience, advice, and recommendations shared with us at our National Dialogue in November 2023. Alongside the President, the Chief Justice, members of Cabinet, the National Director of Public Prosecutions, and the heads of the Hawks, the Investigating Directorate, and the Special Investigating Unit, we were able to hear from more than a hundred citizens, including business leaders, civil society advocates, community representatives, and experts in numerous fields.

We have much to learn from experience around the world, but it is also clear to us that we in South Africa face challenges to our democracy from systemic corruption that are distinct from challenges elsewhere and are particular to our society, our history, and our continuing struggles. Big multinational companies, financial institutions, and consultancies have been accused of corruption in many countries over many decades, but the role that some have played in the saga of state capture in South Africa, described so painstakingly in the Zondo Commission's reports, deserves particular attention so that it is never repeated. Corruption in public procurement and state-owned enterprises is sadly commonplace across the world, yet how it rose to such heights in South Africa just a decade ago must be understood in our unique national context and addressed accordingly. Whistleblowers face retaliation in every country, but the extent of lethal violence and murder-for-hire in South Africa today makes the protection of whistleblowers in our country especially urgent, and especially difficult.

We will need to learn from best practices elsewhere, but we just as surely need new institutions with innovative leaders if we are to remove the scourge of systemic corruption here. The establishment of the new anti-corruption body is the essential starting point, and it is already overdue.

The Council recognises that the key enabling condition for the success of the OPI will be that the new Cabinet continues its efforts in building a capable state with ethical leadership and a committed professional public service based on good governance, transparency, integrity management, and accountability to society.

PART 1 – THE OFFICE OF PUBLIC INTEGRITY & ANTI-CORRUPTION (OPI)

1.1 Establishment of the Office of Public Integrity and Anti-Corruption (OPI)

Recommendation 1

We recommend that the Cabinet advance legislation to establish an Office of Public Integrity and Anti-Corruption (OPI) as a new permanent, independent institution in terms of Chapter 9 of the Constitution.

Recommendation 2

We further recommend that in the transitional phase, the OPI absorbs the mission, powers, and resources of the Special Investigating Unit (SIU), maintaining its full portfolio of work, thus enabling the OPI to be operational with immediate effect and adding to its functions, powers, staff, and resources.

In this way, the OPI will be able to move forward swiftly and South Africa will avoid the costs and inefficiencies of adding an entirely new state institution to the existing array. More importantly, the OPI will begin expeditiously with an experienced, confident team, as well as build on the public trust and lessons learned in the law enforcement space.

The rest of this part of our report considers various components of the new OPI and the relationship of each to the existing law enforcement structures. These include its investigative powers and authority, and the role of the special tribunal currently within the SIU.

1.2 Powers and functions, and work of the Special Investigating Unit (SIU)

In this section, the current powers and functions, and work of the Special Investigating Unit will be described; as well as the limitations of the SIU in relation to its investigative powers and authority.

The Special Investigating Unit (SIU) was established as an independent statutory body in terms of the Proclamation of the President of the Republic of South Africa No. R. 118, 2001; and under section 2(1) (a) of the Special Investigating Units and Special Tribunals Act, 1996 [1] (Act No. 74 of 1996), to exercise or perform the powers, duties, and functions to investigate as contemplated in the said Act, any:

(a) serious maladministration in connection with the affairs of any State institution;
(b) improper or unlawful conduct by employees of any State institution;
(c) unlawful appropriation or expenditure of public money or property;
(d) unlawful, irregular, or unapproved acquisitive act, transaction, measure, or practice having a bearing upon State property;
(e) intentional or negligent loss of public money or damage to public property;
(f) corruption in connection with the affairs of any State institution; or
(g) unlawful or improper conduct by any person which has caused or may cause serious harm to the interests of the public or any category thereof.

Currently, the SIU may only commence investigations authorised by specific Presidential Proclamations. Once an investigation is authorised, the SIU's investigators have powers of search and seizure, and powers to require the attendance of witnesses and production of bank statements and mobile phone records, to interrogate persons under oath, and to

[1] "PROCLAMATION No. R. 118. 2001, Special Investigating Units and Special Tribunals Act (74/1996): Establishment of a Special Investigating Unit", published in No. 22531: GOVERNMENT GAZETTE, 31 JULY 2001.

litigate in civil proceedings on behalf of the State, either in the High Court or before a Special Tribunal. The power of the SIU to litigate in civil matters is provided by the Special Investigating Units and Special Tribunals Act 74 of 1996, which enables special tribunals to be established "to adjudicate upon civil matters emanating from investigations by Special Investigating Units, and to provide for matters incidental thereto".

The SIU, through civil litigation, has the power to recover financial assets lost through the misconduct it finds, and to correct any wrongdoing it uncovers in its investigations.

However, the SIU has no powers to prosecute criminal matters, as these are constitutionally reserved for the National Prosecuting Authority (NPA). The SIU investigators also do not conduct criminal investigations or prepare criminal dockets. At present, when SIU investigators come across criminal conduct, they refer the matter to the NPA, which in turn refers the matter to the Directorate for Priority Crime Investigations (Hawks), or elsewhere in the South African Police Services (SAPS), for further investigation.

A Presidential Proclamation issued in 2019 established a Special Tribunal with a mandate to recover public funds obtained from the state through corruption, fraud, or other illicit financial acts. Today, the Special Tribunal has jurisdiction only over matters arising from investigations conducted by the SIU, and its members are appointed by the President without security of tenure and are not necessarily judges. For these reasons, among others, the Constitutional Court ruled in March 2023 that the Special Tribunal is not a court [Ledla Structural Development (Pty) Ltd and Others v. SIU (CCT 319/21) ZACC 8]. The Special Tribunal operates according to rules it promulgates itself and, as described by the Department of Justice, in contrast to ordinary civil proceedings, it "adopts a more flexible and expeditious approach to legal actions … more inquisitorial in nature".

In the subsequent sections, we will examine how the proposed OPI with its powers and functions will address the current limitations of the SIU. The Council, therefore, is not recommending that the statute transform the SIU into the OPI, or for the SIU to specify its divisions or the programmes it must implement. In presenting our recommendations for the establishment of the OPI, we discuss the reasons for the choices we make.

1.3 Proposed powers and functions of the Office of Public Integrity and Anti-Corruption (OPI)

Recommendation 3

The Council recommends that the Office of Public Integrity and Anti-Corruption (OPI) should have the power to conduct investigations into systemic corruption, either through a Presidential Proclamation or in line with the mandate given to it by drafting a new enabling legislation.

The power and functions of the newly established OPI will address the limitation in the current regime that restricts the SIU investigations authorised by specific Presidential Proclamations. In the Council's view, this restriction contradicts the Jakarta Principles and the principles of independence enunciated by the Constitutional Court in Glenister II. At the same time, we recognise it is important that the OPI does not have an open mandate to pursue any matter it chooses on its own.

The OPI will locate itself in a strategic niche in the existing law enforcement architecture to investigate systemic corruption. Systemic corruption does not always involve individual criminal acts and is not necessarily punishable through criminal law. It enables corrupt actions; it is usually unethical, but not always criminal. It often involves hidden networks of public and private actors that distort and capture democratic processes to facilitate the misuse of public authority for their own personal and political advantage. These networks are governed by unwritten rules, and held in place by rewards (including promotion) or punishments (including bullying). Systemic corruption has eroded the value systems of democratic institutions, turning their purpose from ubuntu to personal gain.

The OPI will need to use a combination of different powers, functions, and capacities to expose and dislodge systemic corruption where it has implanted itself, since it is resistant to conventional methods of reform. For it is here, in the realm of systemic corruption, that the institutional mechanisms of our young democracy have failed and been harmed most dramatically. Corruption has affected the functioning of public institutions and impacted negatively on public welfare and the delivery of public services.

Recommendation 4

The Council proposes a prosecutor-led investigation system in collaboration with the OPI investigative team to fight systemic corruption.

The OPI will work in close collaboration with the SAPS and the NPA during the course of any systemic investigation. When the OPI investigation encounters evidence of criminal conduct during a systemic investigation, it will refer this case to the NPA or Investigating Directorate (ID), which will assign an ID prosecutor to lead further investigations.

Recommendation 5

The NACAC recommends that the investigators employed by the OPI be granted 'search and seizure powers' to properly and fully investigate any potential criminal conduct that is discovered during the course of a systemic investigation. About any criminal conduct arising from systemic investigations, the OPI needs to be given powers to prepare criminal dockets for presentation to the NPA.

The Council acknowledges the mandate of the SAPS and respects that the SAPS will retain its power to arrest and detain any person suspected of criminal conduct in the course of an OPI systemic investigation. The powers of arrest and detention will remain with the police, who must be authorised to execute any warrant of arrest arising from a decision to prosecute made by an NPA prosecutor in respect of an OPI investigation. Such OPI powers and functions should improve the timeliness and effectiveness of criminal charges arising from OPI investigations, avoiding the need to refer matters investigated by the OPI back to the police for further investigation.

The Council also acknowledges the independence of the NPA to retain its exclusive role in criminal prosecutions enshrined in the Constitution, thus preserving its function as an important check and balance about any extraordinary powers of the OPI.

Recommendation 6

The Council recommends that the OPI should have a mandate in its civil recovery processes to claim damages or utilise other civil recovery mechanisms; this should be expanded to include asset recovery arising from criminal investigations.

Recommendation 7

The NACAC further recommends that there must be a legislative amendment to enable the Special Tribunal to have powers of criminal forfeiture, such powers only to be exercised by the OPI in collaboration with the NPA Asset Forfeiture Unit (AFU) and subject to the provisions of the Prevention of Organised Crime Act (POCA).

Currently, the Tribunal does not have such legislative powers, although the rules of the Tribunal were amended to make provisions for the preservation and forfeiture of assets. The Prevention of Organised Crime Act (POCA) governs the preservation and forfeiture of assets in respect of proceeds of crime, and the National Director of Public Prosecutions is authorised to bring such applications in terms of chapters 5 and 6 of POCA. The NPA has argued that only the NPA Asset Forfeiture Unit (AFU) should have the power to bring applications of this nature. The legislative amendments will grant powers of criminal forfeiture, to be exercised by the OPI in collaboration with the NPA AFU and subject to the provisions of POCA.

1.4 Independence of the OPI

The Constitutional Court has established rigorous tests for the independence of an anti-corruption institution. In 2011, the Court in its Glenister II decision described "the main criteria for effective anti-corruption agencies to be independence, specialisation, adequate training, and resources". These criteria have become known as the STIRS criteria (specialised, trained, independent, and resourced, with security of tenure) and are incorporated in the NACS [section 6.3.2]. Specifically, the Constitutional Court tested the independence of an anti-corruption institution by first examining its insulation from political influence through appointments and budget allocations, and second, the security of tenure of its staff and head.[2]

Recommendation 8

The Council recommends that the appointment of the Head of the OPI as the Accounting Officer must meet certain statutory criteria of eligibility and qualifications.

The qualifying criteria for the appointment should include a post-graduate degree in law, economics, public administration, or a similar field relevant to the position; several years of experience in senior management in a relevant organisation in any sector; and a strong record and reputation of integrity. As the OPI is to be established in terms of Chapter 9 of the Constitution, we recommend that the appointment process of its director as well as any deputy directors be the same as for the Public Protector. In terms of budget and financial accountability, we recommend that the director of the OPI be its accounting officer and that the OPI manages its budget as established by Parliament, remains accountable to Parliament for its financial activity, and is subject to annual and special audits by the Auditor General.

1.5 Powers to convene public hearings

Recommendation 9

The NACAC recommends that the OPI be granted additional powers to convene public hearings into instances of systemic corruption, to compel the attendance of witnesses at those hearings, and to require the production of documents and other physical and digital evidence in conjunction with those hearings.

When it exercises this power, the OPI should be required to submit a final report of those hearings to the President, making whatever recommendations it feels are supported by the evidence received and in the public interest. The Zondo Commission recommended the establishment of a permanent commission to investigate and expose acts of state capture and corruption, hold public hearings, and make findings and recommendations to the President. The Council supports this recommendation and proposes that the OPI be given the necessary authority to fulfil this role.

[2] Batohi and Stone. 2023. https://www.bsg.ox.ac.uk/research/publications/chandler-papers-worlds-anti-corruption-efforts-need-reset

1.6 Mandate to Drive the National Anti-Corruption Strategy (NACS) 2020-2030

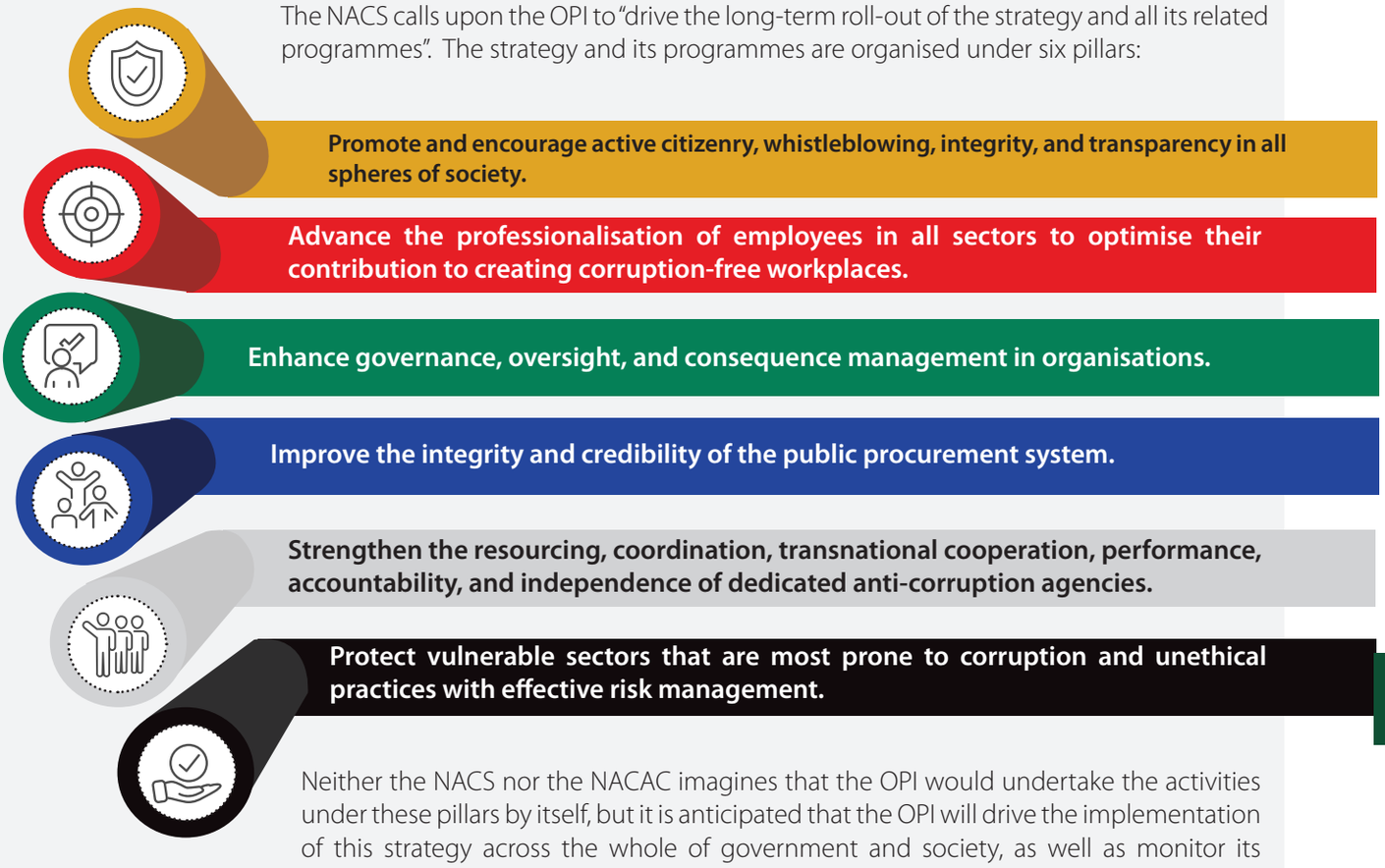
Recommendation 10

The Council recommends that the statute must give the OPI the mandate to "drive the long-term roll-out of the National Anti-Corruption Strategy"; and advise the government on policy measures to advance the NACS, to educate and mobilise the public, to gather and analyse data relevant to corruption and anti-corruption, and to monitor and evaluate the impact of measures designed to prevent corruption, including the receipt and analysis of materials classified as restricted, confidential, or secret.

In adopting the National Anti-Corruption Strategy, the Cabinet has committed the government to bolster its preventive and educational efforts against corruption. As the Strategy itself explains:

> *The NACS is premised on the principle that there should be more emphasis on the prevention of corruption through good governance, transparency, integrity management, and accountability in society, and early detection of potentially corrupt practices to supplement the reactive measures executed by law enforcement agencies and other anti-corruption bodies in society. [NACS, executive summary].*

The NACS calls upon the OPI to "drive the long-term roll-out of the strategy and all its related programmes". The strategy and its programmes are organised under six pillars:



Neither the NACS nor the NACAC imagines that the OPI would undertake the activities under these pillars by itself, but it is anticipated that the OPI will drive the implementation of this strategy across the whole of government and society, as well as monitor its implementation and effectiveness.

1.6 Structure and resources of the OPI to support its mandate and functions

The Council is mindful that the leadership of the OPI will need to create the internal organisation it believes will be most effective and efficient in the realisation of its mandate and its multifaceted functions.

Recommendation 11

The Council recommends that the OPI have statutory authority to create an organisation and to employ staff with expertise in particular areas, which will be essential to its participation with other government entities in the implementation of the NACS.

Specifically, the OPI should have the mandate to employ persons with expertise in any areas it deems necessary for the effective implementation of the NACS or its successor strategies, including, but not limited to; the design and execution of mass media educational campaigns, the drafting and issuance of sector-specific guidance, structures and operations of internal audit and compliance functions, the protection and encouragement of whistleblowers, and the management and mitigation of corruption risks. These expert resources should be deployed in such a way to be able to support individual ministries, departments, agencies, provinces, and municipalities in the effective implementation of preventative and educational activities under one or more of the six pillars of the NACS.

We are mindful that the role of these experts within the OPI is twofold: to alert other organs of government to the risks and dangers accompanying anti-corruption strategies, and to encourage institutional leaders to champion the effective implementation of the pillars of the NACS. For example, anti-corruption educational campaigns have been found in some instances to increase public cynicism and defeatism rather than to mobilise the public to dislodge corrupt practices, and any encouragement of whistleblowing must take account of the risks that whistleblowers assume, as well as the need to deal with false whistles.

These risks simply underscore the need for expertise within the OPI to be available across government and society as the pillars of the National Anti-Corruption Strategy are driven forward.

In summary, the OPI should work in partnership with leaders of public institutions to support them in implementing corruption prevention measures in their institutions and rolling out anti-corruption educational programmes with their constituents and stakeholders. Like the Office of the Comptroller-General in Brazil, the OPI should collaborate with institutions mandated to prevent corruption in the public sector (e.g., the Public Service Commission and the Technical Assistance Unit of the Department of Public Service and Administration) and with individual departments, to analyse corruption problems in individual entities, recommend solutions, and support their implementation. This is the hard, ongoing work of building cultures of integrity in the public sector that will remain resilient in the face of changing forms of systemic corruption.

1.7 The OPI's role in matters of procurement

The Zondo Commission recommended the creation of a standalone institution to deal with matters of public procurement, and, at the time of writing this document, new legislation is under consideration that would reform many matters regarding procurement. We raise questions of our own regarding the regulation of public procurement in Part Two of this report, but our recommendations regarding the role of the OPI in matters of procurement are set out here.

We do not believe that the OPI requires a formal mandate on procurement beyond what has already been discussed. The SIU already investigates matters of corruption and maladministration in procurement and brings cases to the Special Tribunal when there are funds to be recovered. In addition, we have recommended above that the OPI employ experts in this area to work alongside the heads of individual departments as they reform their practices and reduce corruption risks in their procurement processes. These two capacities – one investigative and one preventative – should be enough for the OPI to play its part in the fight against corruption in public procurement.

1.8 South Africa's anti-corruption institutional architecture

Recommendation 12

We recommend that South Africa retain its multi-institution architecture in its fight against corruption rather than consolidating all the work and powers in a single commission or other institutions.

The NACS identified more than 30 separate government departments, parliamentary bodies, and coordinating mechanisms responsible in part for preventing and fighting corruption. [NACS sec 4.3]. Many of these were compromised in the course of state capture, but not all of them. Indeed, the redundancy in the architecture proved its salvation, as institutions like the Public Protector, the Constitutional Court, and the Office of the Auditor General were able to avoid capture and play significant roles in its undoing.

The principle of the division of responsibilities among the institutions authorised to conduct criminal investigations will apply in a multi-institution anti-corruption architecture. The Council suggests that the OPI focus on systemic corruption, that the NPA's Investigating Directorate (ID) focus on high-level corruption, and that the DCPI focus on organised crime and lower-level, opportunistic corruption. Still, those categories are not mutually exclusive, and overlaps are inevitable.

Recommendation 13

The Council recommends the establishment of conflict resolution mechanisms to deal with problems that arise when more than one institution is investigating a particular situation.

Section 24 (4) of the NPA Act provides that Directors of Public Prosecutions may give written directions or furnish guidelines to the Provincial Commissioner of the police service within his or her area of jurisdiction, or any other person within his or her area of jurisdiction who conducts investigations about offences. This clause could be expanded to deal with the issue of 'conflict resolution mechanisms', should the investigating agencies, where more than one institution is investigating a particular situation, not manage to agree.

We do not recommend that any one of these institutions be given authority to stop investigations in any of the others, as this would only make future efforts at capture easier and thus more attractive.

Recommendation 14

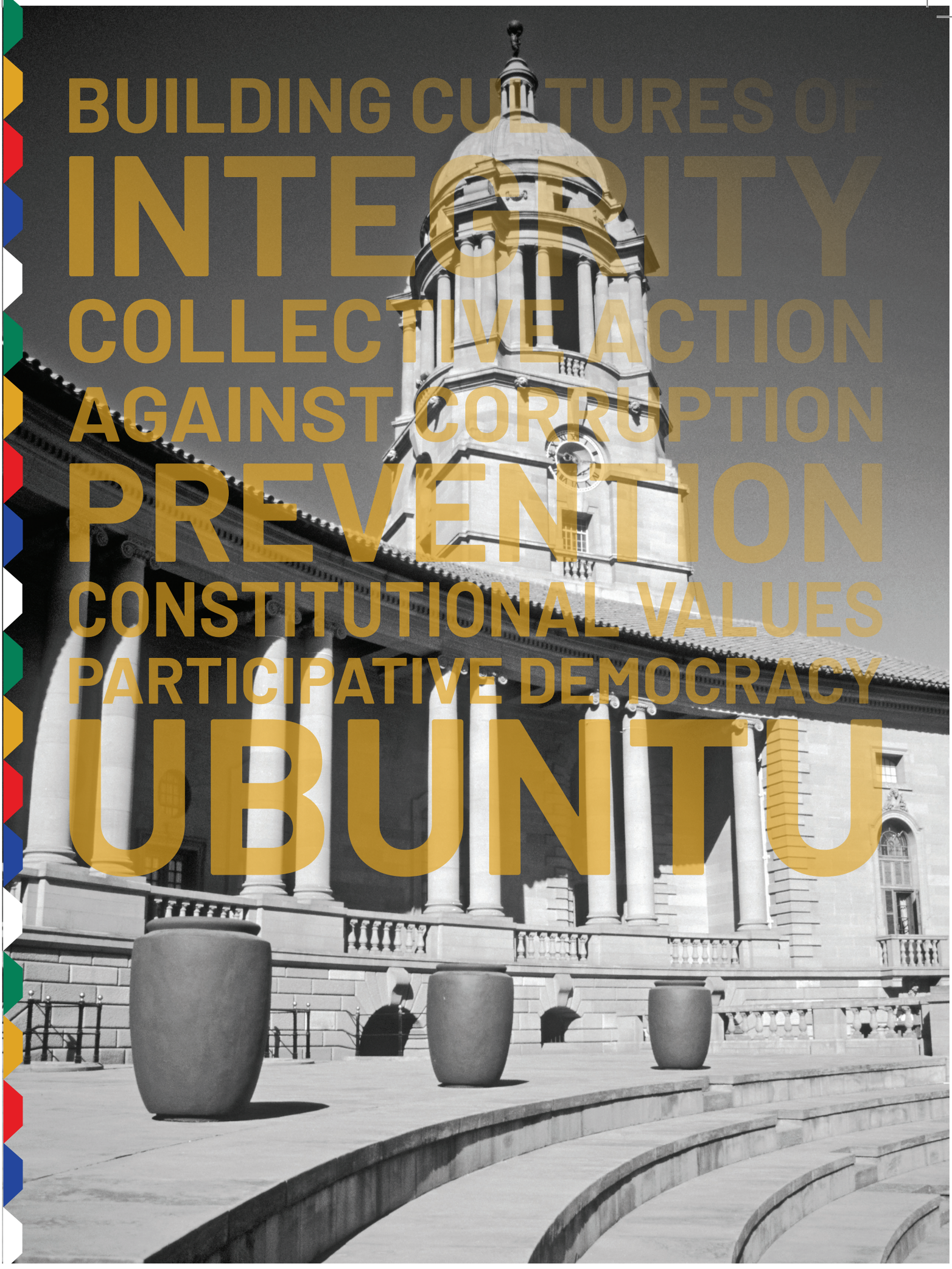
The Council recommends strengthening the efficiency and effectiveness of the National Prosecution Authority's coordination and collaboration role in a multi-agency anti-corruption framework and system.

The Council is of the view that the coordination mechanisms of prosecution within the NPA need to be resourced and strengthened to optimise the location of respective provincial and national heads (Directors of Public Prosecutions and National Director of Public Prosecutions) and avert potential challenges of coordination and collaboration.

The Council is also of the view that the NPA/ID should chair the corruption/organised crime case management coordination mechanism, since the NPA is the final decision-maker in whether or not to prosecute. However, the Hawks and the OPI, as members of the multi-agency system that meet regularly with other relevant bodies (Financial Intelligence Centre, SARS, etc.), should be invited to participate where appropriate.

In summary, we recommend that the OPI take on the role that the NACS envisions for its permanent, independent, overarching body, with the appropriate powers and functions, gaining a wider mandate and stronger independence. The OPI must have a wide, flexible mandate, with broad authority in respect of investigation, prevention, and education. Perhaps, most importantly, it has the potential to become a trusted, expert partner to officials leading government departments across the whole of South African society.

We have not answered every question that might be asked, but we urge the nation to move forward with the proposed course of action as set out in this document as quickly as possible, while there is still time and hope for our young democracy to escape the scourge of corruption and capture.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PART 2 – THE WORK OF THE NATIONAL ANTI-CORRUPTION ADVISORY COUNCIL (September 2022 to March 2024)

2.1 Introduction

Part Two describes the NACAC's work processes and key activities in the first phase of implementation in the 18 months from September 2022 to March 2024.

2.2 The mandate of NACAC

As outlined in the President's letter of appointment to Council members, the mandate of the NACAC is to:

- Advise on the effective implementation of the National Anti-Corruption Strategy (NACS) by government, civil society and the private sector;
- Advise key role players on the overarching purpose of the NACS, namely the six pillars upon which it is premised;
- Advise on the strengthening of South Africa's anti-corruption architecture;
- Host national anti-corruption summit(s), bringing together government, civil society, business, and academia, to set the country's anti-corruption agenda and evaluate progress in the implementation of the NACS.

THE NATIONAL ANTI-CORRUPTION STRATEGY IS PREMISED ON THREE KEY PRINCIPLES:

1. The prevention of corruption through good governance, transparency, integrity management, and accountability in society.
2. Supporting law enforcement agencies and other anti-corruption bodies to combat corruption through early detection of potentially corrupt practices.
3. Raising public awareness about corruption and promoting constitutional values and ethical leadership throughout South African society.

The NACAC is also expected to advise on the implementation of the recommendations of 'The Judicial Commission of Enquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector, including Organs of State' (the Zondo Commission) from a strategic and systemic perspective.

2.3 Composition of the Council

The NACAC was appointed by the President following a public call for nominations. Council members represent civil society, traditional authorities, academia, the legal profession, and labour. These members are:

1. Professor Firoz Cachalia (Chair)
2. Inkosikazi Nomandla Dorothy Mhlauli (Deputy Chair)
3. Ms Kavisha Pillay
4. Mr David Harris Lewis
5. Mr Nkosana Dolopi
6. Ms Barbara Schreiner
7. Adv. Nokuzula Gloria Khumalo
8. Mx Sekoetlane Phamodi
9. Ms Thandeka Gqubule-Mbeki

2.4 Accountability of NACAC to the President and engagement with government departments and the Forum of South African Directors-General (FOSAD)

The NACAC reports and accounts to the President through the Office of the Minister in the Presidency. At times it may be necessary for the NACAC Chairperson to have a one-on-one with the President to brief him on urgent matters. Advisory and related matters arising from the work of the NACAC that require implementation by government departments may be handled through the Minister in the Presidency.

The NACAC may advise, or report on its work to the Forum of South African Directors-General (FOSAD) through the Director-General in the Presidency and Secretary of the Cabinet in her capacity as the Chairperson of FOSAD. The NACAC thus engages with all government departments through the Office of the Director-General of the Presidency.

2.5 Organising structure and functions of NACAC

The NACAC convenes monthly plenary meetings and ad hoc plenary meetings as and when needed. Decisions of the Council are taken at the plenary meetings. Advisories to the President are approved by the full Council before submission to the President. To date, the NACAC has submitted seven advisories to the President.

To facilitate its work, the NACAC established six workstreams to address identified priority areas. Each workstream is led by a NACAC councillor and has other councillors as members, supported by members of the NACAC secretariat. Each workstream committee provides progress on its key activities and recommendations to the NACAC at plenary meetings for noting, decision-making, or action, as may be the case. Several of the workstreams established reference groups made up of subject experts to inform their work.

- **Institutional Architecture:**
  Mr. David Lewis (convenor), Prof Cachali and Ms. Schreiner (members)
- **Public Procurement:**
  Adv. Gloria Khumalo (convenor), Ms Schreiner (member)
- **Monitoring, Evaluation, Research, and Learning:**
  Mx Sekoetlane Phamodi (convenor), Ms. Schreiner and Mr. Dolopi (members)
- **Legislation Reform & Transparency:**
  Ms. Kavisha Pillay (convenor)
- **Communication and Engagement:**
  Ms. Nkosikazi Mhlauli (convenor) Mr. Dolopi, and Mr. Lewis (members)
- **Whistleblower Protection:**
  Ms Thandeka Gqubule-Mbeki (convenor)

The NACAC's work is supported by a Secretariat composed of officials from the Presidency, the Department of Planning, Monitoring and Evaluation, and the State-owned Entity established by the Office of the Director-General in the Presidency.

2.6 Relevance of the NACAC mandate

The contextual relevance of the NACAC mandate and its custodianship in implementing South Africa's Anti-Corruption Strategy must first be measured in terms of its responsiveness to corruption in South Africa in the last decade, as highlighted by the State Capture Commission. Secondly, the relevance of the NACAC mandate must be measured in terms of its alignment with international and national legal frameworks. The United Nations Convention against Corruption (UNCAC) was developed as a comprehensive response to this global problem. UNCAC requires state parties to ensure the existence of a body or bodies that prevent corruption (article 6), and that specialise in combating corruption through law enforcement (article 36). It provides that States parties shall grant such a body or bodies the necessary independence to enable them to carry out their functions effectively and free from any undue influence, as well as the necessary material resources, specialised staff, and training that such staff may require to carry out their functions. South Africa is also a signatory to the following international conventions: the Organization for Economic Co-operation and Development (OECD) Anti-Bribery Convention, the SADC Protocol Against Corruption, and the AU Convention on Preventing and Combating Corruption.

The NACAC's mandate is to address corruption that negatively impacts socio-economic development and service delivery in the country and undermines the governance of private and public institutions and the rule of law. The NACAC's strategic intent is to respond to the South African Constitution's obligations to protect the values embedded in a democratic South African state and the whole of society – values of openness, responsiveness, and accountability. The Constitution describes state institutions and their obligation to prevent and combat crime, as well as the state's responsibility to protect the poor and vulnerable sections of society and to put them first in state budgeting and provision of social services.

2.7 Description of the work of the NACAC

The work and key activities of the National Anti-Corruption Advisory Council over the past 18 months are described in this section.

The NACAC Plenary met monthly to plan and report on activities of the different workstreams, to take key decisions, and to propose actions for the implementation of the NACS. The Plenary has adopted key advisories to submit to the President, which will be discussed in the respective workstream reports.

2.7.1 Institutional Architecture

The Institutional Architecture workstream focused its work on understanding the current anti-corruption institutional architecture and on developing a recommendation for the creation of an anti-corruption agency to deal primarily with systemic corruption. This recommendation was discussed in the previous chapter.

The workstream convened a reference group of experts from civil society who provided research and advice to support its work. Various engagements and interviews were held with law enforcement and government stakeholders, in particular the heads of institutions like the Special Investigating Unit, the National Prosecuting Authority, the Directorate for Priority Crime Investigation, and the collective Anti-Corruption Task Team (ACTT). To understand the institutional architecture, the workstream conducted a collaborative system mapping workshop with heads and staff of law enforcement agencies and civil society representatives on 15 September 2023 to collect data on problems faced by anti-corruption agencies. This was held as part of the ongoing research that will inform the recommendations to the President on reforms to the country's anti-corruption architecture. The workstream conducted a series of in-depth expert interviews with key stakeholders from law enforcement agencies. It also did extensive desktop research, gathering sufficient evidence to inform its analysis of the ecosystem of law enforcement agencies and to make recommendations on strengthening the criminal justice system. Based on this research, and the engagements with national and international players in law enforcement agencies, the workstream conceptualised the creation of a new, independent, overarching institution to play a leading role in dealing with systemic corruption.

2.7.2 Procurement Reforms

Public procurement is a key pillar of service delivery, and of realising the aspirations of our Constitution for equitable and just social and economic development. The government spends around R1 trillion per annum on the procurement of goods, services, and works.

While we have made progress in the fight against state capture and corruption, much work remains to rebuild the capacity of the state to reduce the risk of corruption in procurement.

State capture revealed significant deficiencies in the existing procurement systems and processes. The public procurement system was the primary site for the redirection of state resources, particularly in state-owned entities, which have the largest procurement, capital, and operational budgets.

Enhancing the integrity of the public procurement system must therefore be a central component of the state's response to state capture. It is also a pillar of the National Anti-Corruption Strategy, which anticipates a public procurement system that is insulated from corruption and is better structured to drive development, expand the productive base of the economy, and support innovation and investment. A sound procurement system can significantly reduce the risks of corruption in public procurement. The recommendations by the NACAC are made with this in mind.

The recommendations are also made mindful of the need to ensure that the fight against corruption does not lead to perverse outcomes. The Public Finance Management Act (PFMA) and the Municipal Finance Management Act (MFMA) were designed to enable managers to manage while holding them accountable. The intention is for accounting officers to be problem-solvers, and not to be prosecuted for making decisions in good faith. This was a need recognised by the Zondo Commission.

The Public Procurement Reform workstream established a reference group of experts from academia and civil society to support its work. The workstream held a workshop at the Protea Hotel, Hatfield on 21 September 2023, which was co-hosted by the United Nations Office on Drugs and Crime. The dialogue and input from different sectors of society contributed to a rich evidence base that informed the analysis of and recommendations on procurement reforms. Various engagements took place with key government stakeholders regarding public procurement, and also with the Kenyan Public Procurement Regulatory Authority, Kenya Institute of Supply Management (KISM), and Kenya Institute of Supplies Examination Board (KISEB), on a study tour to Kenya.

The NACAC approved an advisory to the President on the Public Procurement Bill on proposed procurement reforms, which addressed several weaknesses in the Bill from an anti-corruption perspective.

It recommended that the Bill should:

- provide for the establishment of an independent Public Procurement Regulatory Authority (PPRA) to ensure independence and effectiveness in the regulation of public procurement and refer issues of corruption and procurement fraud to the relevant law enforcement bodies;
- reduce the exclusions and complexity of the regulatory system, since excessive exclusions and complexity are breeding grounds for corruption;
- provide for the establishment of a procurement professional body and accreditation system;
- set out clear principles and an approach to guide open data and transparency requirements;
- require the PPRA to refer issues of corruption and procurement fraud to the relevant law enforcement bodies;
- protect whistleblowing about public procurement within the framework established in the Protected Disclosures Act;
- embed open contracting reforms throughout the full procurement cycle to strengthen anti-corruption measures; and
- make provision for a national anti-corruption charter to be signed by all bidders on state contracts, as envisaged by the Zondo Commission.

2.7.3 Monitoring, Evaluation, Research, and Learning

The NACAC Monitoring, Evaluation, Research, and Learning (MERL) workstream hosted a workshop in October 2023 on the design of a NACS Implementation Plan and Monitoring Framework. The key objective was to build consensus on the NACS Implementation Plan, which is critical for the institutionalisation of NACS interventions in government programmes. Participants included the NACAC MERL workstream and its reference group, other NACAC workstreams and the NACAC secretariat, and representatives from the Department of Planning, Monitoring and Evaluation (DPME), the Human Sciences Research Council (HSRC), the WITS Centre for Learning on Evaluation and Results (CLEAR-AA) and the GIZ Transparency, Integrity and Accountability Programme (TIP).

To support the development of a coherent conceptual framework by which South Africa can be able to monitor and assess whether the NACS is making a meaningful contribution to mitigating corruption risk and strengthening integrity in the public sector and society at large, the workstream has conducted a literature review to benchmark approaches to measure the efficacy of anti-corruption strategies. The purpose of this literature review is to guide the development of a monitoring system with robust indicators that support the use of an evidence-based approach to measure the implementation of the NACS. The draft indicators will guide the alignment of specific programmes and projects that will be implemented individually and collectively by social partners in the all-government and all-society approach prompted by the NACS. The literature review will be developed into a discussion document for further engagement with sectoral partners.

The workstream has prepared an advisory on the mainstreaming of the NACS through government, which has been referred to the President. The advisory urges the President to raise the NACS as the guiding framework for all anti-corruption programmes and initiatives conducted by government in the development of the mid-term strategic framework of the seventh administration. It goes further to urge the integration of the NACS into the annual performance planning cycle of government, starting in the 2024/25 financial year.

2.7.4 Legislation & Transparency

This workstream focused their work on strengthening transparency in political party funding. Money and politics have long been intertwined, often resulting in a complex relationship that can deeply affect democratic processes and, in unregulated environments, give rise to corruption and state capture. Financial support from wealthy individuals and corporations can shape elections and policy decisions, potentially leading to outcomes that favour private interests over the needs of the broader population. In response to recommendations emanating from both the State Capture Commission and the National Anti-Corruption Strategy (NACS), that regulations and transparency relating to political party funding should be strengthened and improved, the NACAC legislative reform and transparency workstream submitted two advisories to the President on this matter.

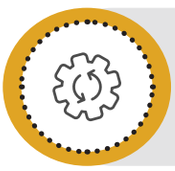
In its first advisory, NACAC made the following recommendations:

Corrupt donations: The Political Party Funding Act (PPFA) should not introduce the Corrupt Donation Crime as a separate offense, as recommended by the State Capture Commission. Instead, it should reference Section 13 of the Prevention and Combating of Corrupt Activities Act (PRECCA), which already criminalises corrupt donations.

Disclosure and caps: Any amendments to the current thresholds for disclosure and caps on donations should be postponed until sufficient evidence is available to make informed decisions regarding more appropriate thresholds and caps.

Natural person disclosures: Natural persons who donate amounts exceeding the Section 9(1)(a) threshold should be required to disclose their donations directly to the Independent Electoral Commission (IEC).

Circumvention of caps: Natural persons and juristic entities should be prohibited from circumventing the Section 8(2) cap by making multiple donations through related juristic entities.



Bank account for donations: Section 10 of the PPFA should be strengthened by requiring all private monetary donations to political parties to be deposited directly into the bank account specifically created for donations in Section 12(1)(a).

Internal party races: Donations made to internal party races should be subjected to the same disclosure thresholds and prescribed maximum caps as those applied to political party funding by the PPFA.

Investment vehicles: Mandate the disclosure of sources of investment income for political party investment vehicles and subject them to the same prohibited sources of income imposed on political parties in Section 8(1).

Independent candidates: Donations received by independent candidates should be regulated and guidelines set for how they receive money from public funds, as established in Sections 2 and 3.

Political Party Funding Unit: The Political Party Funding Unit (PPFU) within the IEC should be adequately resourced and staffed to effectively conduct oversight, monitor donations, and investigate complaints.

Following the adoption of the Electoral Matters Amendment Bill (EMAB) by the National Assembly and National Council of Provinces, the NACAC submitted a second advisory.

This advisory cautioned the President that, if he enacts certain provisions of the Electoral Matters Amendment Bill (EMAB) without concurrently issuing a proclamation based on a resolution from the National Assembly specifying both disclosure thresholds and maximum donation limits, political parties and independent candidates will not be legally obligated to reveal their funding sources, nor will there be any imposed upper limits on the donations they can receive.

NACAC was concerned that this legal gap, especially during a critical election period, could increase the risks of both quid pro quo and clientelist corruption, thereby undermining the integrity of the election.

To address these concerns, NACAC advised the President to assent the EMAB into law, but specify an alternative commencement date for the sections concerning disclosure thresholds and donation limits. To avoid a lacuna in law, protect the integrity of the electoral process, and mitigate corruption risks, we recommended that these provisions come into effect on 1 July 2024. This approach will ensure a seamless transition during the election and reinforce the PPFA during the interim period.

Improving data collection and use to fight corruption in South Africa

Another key milestone achieved by the workstream was the hosting of the InData workshop, held on 18 -19 September 2023, organised in conjunction with the Special Investigating Unit, Department of Cooperative Governance, and the Transparency, Integrity, and Accountability Programme of the GIZ, which brought together key stakeholders to explore the role of data analytics and science in combating corruption in South Africa. Organised by NACAC in partnership with various stakeholders, the event introduced participants to corruption intelligence and data mapping, offered practical skills in data collection and analysis, and discussed the challenges and opportunities of using data-driven approaches in anti-corruption efforts.

The workshop's primary objectives included:

- **Data mapping:**
  To provide participants with tools for data collection and analysis, helping to map organisations collecting corruption data and to demonstrate how data tools can identify corruption risks and vulnerabilities.
- **Opportunities and challenges:**
  To discuss the opportunities available from existing data, including entity profiling, identifying high-risk organisations, data-driven risk assessments, and predicting waves of corruption. The challenges, such as legal, privacy, and ethical concerns, data specificity, and the need for data standards, were also explored in the workshop.
- **Data-driven strategies:**
  To examine specific strategies for addressing corruption in vulnerable sectors such as healthcare, local government, and infrastructure.

The key issues that emerged from the consultative sessions were:

- **Legal and ethical considerations:**
  The need to balance transparency and compliance with laws like POPIA (the Protection of Personal Information Act), as well as ensuring sensitive data is handled appropriately.
- **Data specificity:**
  The need for specific and granular data must be managed around the risks of accessibility of data for different audiences.
- **Central repository:**
  Participants called for a central data repository, although concerns regarding privacy, accuracy, and accessibility protocols were raised.
- **Trust and collaboration:**
  Participants emphasised the need for trust-building within and across sectors, and establishing a culture of responsible and ethical data sharing.

Consensus and way forward:

The workshop emphasised the importance of data-centric interventions, collaboration, and innovation in anti-corruption efforts:

- **Data governance:**
  Developing a framework to guide ethical and lawful data sharing.
- **Cross-sector collaboration:**
  The need for partnerships to integrate and analyse data efficiently.
- **Capacity building:**
  The importance of employing data analysts/scientists in the public sector to create the capacity to use data techniques and tools.

In 2024, NACAC plans to organise a follow-up workshop to further discuss data governance, standards, and collaboration, alongside practical training sessions.

2.7.5 Whistleblower Protection and Support

This workstream conducted extensive research on international best practice frameworks, including research visits to the Netherlands and Kenya on whistleblower policy. In addition, the workstream conducted collaborative research with South African experts from civil society, including engagement with key stakeholders – the Department of Justice and Constitutional Development in particular – in finding solutions to improve the legal and policy framework governing the support and protection of whistleblowers.

In line with Pillar One of the NACS, which aims to protect and support whistleblowers and resource whistleblower mechanisms, this workstream developed two Presidential Advisories on whistleblowing. The first advisory was on the appointment of a retired judge as an interim arrangement for the protection of whistleblowers while the legislative reforms and institutional architecture were developed and processed.

The first advisory makes the following recommendations related to the protection and support of whistleblowers:

That the President issues further public communication in support of whistleblowers who are exposing corruption. This could be in the form of a media statement, or from the President's weekly 'From the Desk of The President' newsletter;

That the President should table his support for whistleblowers at a Cabinet meeting and note that retaliatory behaviour towards whistleblowers will not be condoned. A statement by Cabinet should be released to the public in this regard, outlining the potential consequences for public servants and public office bearers who attack and victimise whistleblowers.

That, through the relevant NACAC workstream, the President should convene a small gathering of whistleblowers who exposed corruption at various state entities, to publicly recognise these individuals for their efforts, integrity, and perseverance, and to better understand the plight they faced.

That the President considers acknowledging whistleblowers who exposed corruption with national orders of merit for their duty to our country and service to our nation.

The second advisory was on the reform of the Protected Disclosures Act and the need for next-generation whistleblower legislation in South Africa.

2.7.6 Communication and Engagement

NACAC has approved the NACS Communication and Engagement Strategy. This workstream led the collaboration with broader society by hosting the National Anti-Corruption Dialogue 2023, which was held on 8 and 9 November 2023 at the Birchwood Conference Centre in Ekurhuleni with support from the Transparency, Integrity and Accountability Programme of GIZ and the United Nations Office on Drugs and Crime. The event was attended by the President, Chief Justice Zondo, numerous cabinet ministers, representatives from the National Economic Development and Labour Council (Nedlac), foreign dignitaries, and the media. The dialogue brought together 300 invitees from government, business, and civil society. The first day, facilitated by the chairperson of the Public Service Commission, involved addresses from the President, the Chief Justice, the Chairperson of NACAC, Prof Christopher Stone, as well as inputs from Nedlac labour and civil society representatives. The second day provided an opportunity for in-depth engagement and consultation on the focus areas of the NACAC workstreams. In addition, the workstream organised two roadshows in North West and Limpopo provinces that took place during the review period. These were hosted by the respective Premiers' offices and led by the NACAC communication workstream. The workstream developed a logo and a website.

PART 3 — THE NEXT PHASE OF IMPLEMENTATION OF NACAC

In the next phase of implementation, NACAC will prioritise the further development of the OPI and the implementation of the different pillars of NACS across the whole of government and South African society.

3.1 Key issues to be addressed through further research and engagements

Part Three deals with issues that the NACAC will address through further research and engagements.

Planning for the transitional arrangement for the establishment of the Office of Public Integrity (OPI)

As a transitional arrangement, the NACAC will plan to establish a new institution with clearly delineated functions and powers to deal with systemic corruption, by using and expanding on the existing infrastructure, resources, personnel, and powers of the Special Investigating Unit. This will allow the new body to take up its strategic mandate without the delays and expenses that an entirely new institution would necessitate. Further research will be conducted in drafting the enabling legislation and/or amendments to current legislation for the establishment of the OPI, in particular defining its mandate, powers, and functions in close engagements with key stakeholders.

Strengthening the capability and independence of law enforcement agencies

The NACAC, through further research and engagement with key stakeholders, will work towards strengthening the existing capability and independence of law enforcement agencies, streamlining functions to manage duplication, and facilitating collaboration and coordination.

For example, the NACAC recognises that, despite advances in the NPA Amendment Act, the overall governance of the NPA compromises its independence and, by extension, that of the Independent Directorate to prosecute corruption cases effectively. The NACAC plans to engage in further research and consultations to strengthen the independence and resourcing of the NPA in terms of the criteria for independence set out in STIRS and the Jakarta Principles. The Council will conduct further research on strengthening law enforcement agencies and the criminal justice system.

Strengthening legislative reform and transparency

In the NACAC's next phase, the Council will produce advisories relating to enacting legislation on lobbying, as well as the appointment processes of senior government officials. Additionally, we will commence with research and deliver advice on how to effectively combat financial crimes in South Africa.

Strengthening the public procurement system

Following the advisory to the President on strengthening the Public Procurement Bill, the NACAC intends to make further recommendations about the framework of the Public Procurement Regulatory Authority as it pertains to the control and reduction of corruption risk and the relationship with the proposed OPI; the establishment of a professional institute and accreditation system for procurement practitioners; and open data and e-procurement.

Strengthening professionalisation and discipline management in the public sector

The NACAC recognises that poor enforcement of lifestyle audits and discipline management in the public sector enables corruption. The NACAC intends to engage with the Public Service Commission and the DPSA to strengthen lifestyle audits and discipline management in the public service. Discerning the correct institutional framework for this task is beyond the mandate of the NACAC. Accordingly, the NACAC will engage with PSC to consider research to reform and strengthen discipline management in the public sector, and to examine how lifestyle audits can be conducted in the local government sphere and state-owned entities. We believe that the imperative to strengthen discipline management in the public sector is a critical component of the government's stated commitment to the professionalisation of the public sector. The Council will conduct further research into strengthening professionalisation and integrity management systems within the government. This will include recommendations relating to the process governing the appointment of senior public officials.

Strengthening whistle-blower protection and support

The NACAC will have to consider whether whistleblower and witness protection functions should be located in the OPI. The NACAC will conduct further research in several areas: on the exact design of the proposed new permanent institution, considering international best practices; how to deal with all whistleblowers, not just those assisting the OPI; how to define whistleblowers, i.e., determine the threshold for support and protection; exactly what capabilities the permanent institution will require; resourcing the new institution; further research topics that include education/communication campaigns based on international models; and on the system of compensation, rewards, and awards; and how whistleblower policy should deal with different types of whistleblowers, e.g., the innocent 'good faith' whistleblower versus the person implicated in criminal conduct.

Institutionalising the implementation, monitoring, and reporting on the key pillars of the National Anti-Corruption Strategy in the Medium Term 2024-2029 Plan of Government.

The Council will engage with key governance structures and committees to encourage government institutions to institutionalise the implementation, monitoring, and reporting of the key pillars of the NACS in the Medium Term 2024-2029 Plan. The strategic plans (2024-29) and annual plans and programmes of government institutions should focus on strengthening state capability through the prevention of corruption. Strategic interventions should aim to promote good governance, transparency, integrity management, accountability, and early detection of potentially corrupt practices in government; and should include discipline and consequence management. National departments should drive the implementation and monitoring of key strategic interventions in NACS in partnership with key stakeholders in the 'whole of government and whole of society'. The monitoring framework of the NACS should include key performance measurements for each intervention to guide the gathering and analysing of data relevant to corruption and anti-corruption, and to monitor and evaluate the impact of measures designed to prevent corruption. The critical issues of gender and human rights should inform performance measurements of outputs and outcomes, data sourcing, data analysis, and reporting.

3.2 Concluding remarks

In the past 18 months, in its first phase of implementation, the National Anti-Corruption Advisory Council (NACAC) responded to the State Capture Commission recommendations on the prevention and combating of corruption. The NACAC executed its operational activities in collaboration with key stakeholders in civil society, business, and government, and achieved its outputs as planned. Furthermore, through a broad consultative process with key national and international stakeholders and social partners, the NACAC was able to develop a proposal for submission to the President on the establishment of a permanent anti-corruption body in collaboration with existing law enforcement agencies to strengthen the detection, investigation, and prosecution of systemic corruption. The NACAC produced evidenced-based advisories to the President to strengthen procurement, mitigate risks of party-political funding, and implement whistleblower protection and support policies.

In the next phase of implementation, the NACAC's work will focus on establishing the anti-corruption body and facilitating the implementation of the NACS. The Council will intentionally enhance its communication and advocacy of the NACS as an all-of-society effort, with government, business, and civil society working together to contribute to significantly reduced levels of corruption, and improved investor and public confidence in South Africa.

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Presents the

MID-TERM REPORT

To the President, The Cabinet & The Country

MAY 2024

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