

GAUTENG PROVINCE

HUMAN SETTLEMENTS
REPUBLIC OF SOUTH AFRICA

**STRATEGIC FRAMEWORK
ON
ANTI-FRAUD, ANTI-CORRUPTION AND
ETHICS MANAGEMENT**

Period:

2016/2017 – 2018/2019

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A. ABBREVIATIONS

AFCU	: Anti-Fraud and Corruption Unit
DPSA	: Department of Public Service and Administration
EA	: Executive Authority
EXCO	: Executive Council
GPG	: Gauteng Provincial Government
HOD	: Head of Department for Department of Human Settlements
MEC	: Member of the Executive Council (responsible for Cooperative Governance and Traditional Affairs and Human Settlements)
NACH	: National Anti-Corruption Hotline
OoP	: Office of the Premier
PACCC	: Provincial Anti-Corruption Coordinating Committee
PRECCA	: Prevention and Combating of Corrupt Activities Act (12 of 2004)
PDA	: Protected Disclosures Act
PFMA	: Public Finance Management Act
PSC	: Public Service Commission
SMS	: Senior Management Services as defined in the Public Service Regulations 2016

B. DEFINITIONS

Corruption - The Prevention and Combating of Corrupt Activities Act, 2004 (Act No.12 of 2004) provide a very specific legal definition of corruption. It can be summarized as follows:

"Corruption is where a person (A) gives (or offers to give) someone in a position of power (B) something (called 'gratification' in the Act) to use that power, illegally and unfairly, to the advantage of A (or a third person). B will also be guilty of the same crime if he/she accepts (or offers to accept) the gratification to wrongly use his position.¹"

Designated employees – Chief Construction Project Managers

Ethics - the term "ethics" refers to standards of conduct, which indicate how a person should behave based on moral duties and virtues arising from the principles of right and wrong. Ethics therefore involve two aspects: (1) the ability to distinguish right from wrong; and (2) the commitment to do what is right.

Fraud – the unlawful and intentional making of a misrepresentation which causes actual prejudice or which is potentially prejudicial to another.

Gratification – The Prevention and Combating of Corrupt Activities Act, 2004 (Act No.12 of 2004) (Section 1: ix) provide a very specific definition to: include money, donations, gifts, loans, discounts, status, honour, and employment.

Integrity – refers to the quality or state of being of sound moral principle; uprightness, honesty, sincerity.

Misconduct – means wrongful, improper, or unlawful conduct motivated by premeditated or intentional purpose or by obstinate indifference to the consequences of one's acts.

The Department - Gauteng Department of Human Settlements.

Values – refers to beliefs of a person or social group in which they have an emotional investment either for or against something.

Whistle blowing – whistle blowing is not about informing in the negative, anonymous sense, but rather about raising a concern about malpractice within an organization.

C. LEGISLATIVE AND POLICY FRAMEWORKS

Underscoring South Africa's efforts to combat and prevent corruption are the following pieces of legislations and policy framework:

I. LEGISLATIVE FRAMEWORKS

- a) The Prevention and Combating of Corrupt Activities Act, 2004 (Act No. 12 of 2004);
- b) The Promotion of Access to Information Act, 2000 (Act No. 2 of 2000);
- c) The Promotion of Administrative Justice Act, 2000 (Act No. 3 Of 2000)(the PAJA);
- d) The Protected Disclosures Act, 2000 (Act No. 26 of 2000);
- e) The Public Finance Management Act, 1999 (Act No. 1 of 1999) (the PFMA);
- f) The Finance Intelligence Centre Act, 2001 (Act No. 38 of 2001) (the FICA);
- g) The Prevention of Organised Crime Act, 1998 (Act No. 121 of 1998);
- h) The National Prosecuting Authority Act, 1998 (Act No. 32 of 1998);
- i) The Public Service Act, 1994 as amended;
- j) The Public Service Integrity Management Framework;
- k) The Public Service Regulations of 2016;
- l) The National Treasury Instruction SCM Instruction Note 3 of 2016/17

1. INTRODUCTION

- 1.1 In pursuit of its mission to provide relevant differentiated, quality housing opportunities to qualifying beneficiaries in partnership with various stakeholders. The Department strives to ensure that public funds allocated and entrusted to it are used for its intended purposes.
- 1.2 To this end, the Department established the Anti-Fraud and Corruption Unit to combat fraud and corruption and promote ethical conduct in its business operations.
- 1.3 This strategic framework encourages and adopts the provisions and recommendations made in terms of the 2011 revised Gauteng Provincial Anti-Corruption Strategy, as well as the recommendations made by DPSA in 2001 on Minimum Anti-Corruption Capacity requirements to be implemented by Departments in its anti-fraud and corruption measures and programmes.
- 1.4 The strategy takes into consideration feedback from Department's Management, staff members, Audit Committee and other Stakeholders.
- 1.5 The strategic framework also includes description of AFCU internal structure and key business processes.
- 1.6 The AFCU will continue to expand its role in the combating fraud and corruption, as a catalyst to identify and mitigate integrity risk within the Department's operation. This strategy document is a roadmap to achieving those overarching goals.

2. BACKGROUND

- 2.1 In the Gauteng Province, the first Provincial Anti-Corruption Strategy was developed in 2002. This strategy was revised and in 2007 and approved by

EXCO. Subsequent to that the strategy was approved as well as the GPG Whistle-Blowing Policy.

- 2.2 The Gauteng Anti-Corruption Strategy was revised and approved in 2009. In the implementation of the 2009 strategy, the GPG noted lack of capacity, skill development and training of provincial anti-fraud, anti-corruption and ethics management initiatives of officials to implement the Gauteng Anti-Corruption Strategy and Public Service Integrity Management Framework. It further noted that corruption is a societal challenge that affected every citizen of GPG.
- 2.3 In order to address skills development, the Office of the Premier has trained forty (40) senior investigators, thirty (30) junior investigators and seventy (70) officials on Ethics Officer Certification Programme by 2015. Further training on Ethics Officer Certification Programme, Anti-Corruption training, Ethical Decision for Senior Management Service (SMS) members, Public Service Ethics Training Programme were provided by the Office of the Premier to officials in Gauteng Departments.
- 2.4 In efforts to strengthen the anti-corruption measures within the province, the 2009 Anti-Corruption Strategy was revised to include the broader participation and partnership of various sectors of the society as a forefront of the integrated efforts against corruption. As a result of this action, GPG adopted the 2015-2019 GPG Anti-Corruption Strategy with strategic objectives agreed upon by the public sector together with civil society and business. The adoption of this strategy embraced a shift from fighting corruption to increasing integrity as a move to transformation of the state and governance and building an ethical Public Service. It is against this background that the GDHS Anti-Corruption Strategy is developed.
- 2.5 In 2013/2014, the Department developed a Three Year Strategic Framework on Anti-Corruption, Fraud and Ethics which was informed by the GPG Anti-

Corruption Strategy. The Strategic Framework covered three (3) financial years ending in 2015/2016 financial year.

- 2.6 There has been developments in the legislative environment which requires that the necessary changes be incorporated in all strategies, policies aimed at combating fraud, corruption and to promote ethical conduct. For instance, the National Treasury Instruction SCM Instruction Note 3 of 2016/17 prescribe the period to investigate procurement irregularities and that these should be reported to the Provincial Treasury in the period prescribed by the Instruction Note.

3. OBJECTIVES OF THE STRATEGY

The specific objectives of this anti-corruption strategy are:

- 3.1 To fight fraud and corruption in the Department in all its forms, through prevention, detection, investigation and resolutions and recovery of losses suffered by the Department because of fraud and corruption.
- 3.2 To identify common strategic priorities in combating fraud and corruption in Gauteng human settlement sector.
- 3.3 To promote a culture of professional ethics and good governance within the Department.
- 3.4 To collaborate with other sectors of society for the purpose of information sharing of good practices and to encourage business and civil society to report allegations of fraud, corruption and unethical conduct.
- 3.5 To magnify Department's efforts to create awareness, training and education about fraud, corruption and unethical conduct including how and where to report corruption and/or any unethical conduct.
- 3.6 To promote and strengthen compliance to and enforcement of legislation, regulations and policies prescribed by government to fight fraud and corruption and to promote ethics in the Department.
- 3.7 To ensure that all suspected and reported acts or incidents of corruption in the Department are fully investigated.

- 3.8 To ensure that the Department applies sanctions and punitive measures to all persons and companies found to have committed fraud and corruption against the Department.
- 3.9 To ensure that the Department recovers financial losses from all persons and companies that might have suffered as a result of fraudulent and corrupt activities.
- 3.10 To ensure that disciplinary measures are taken against any employee who have transgressed against the provisions of any policy and procedure of the Department.
- 3.11 To report criminal conduct to the South African Police Services (SAPS) whereof allegations of fraud and corruption have been proven after investigation is conducted.

4. SCOPE

This strategy applies to all allegations of fraud, corruption and unethical conduct or suspected irregularities of any nature involving the following persons or companies:

- 4.1 All employees of the Department.
- 4.2 Members of the public who commit any act of fraud and corruption in the implementation of Human Settlements programmes of the Department.
- 4.3 Private individuals and entities who provide goods or services to the Department and to the public on behalf of the Department, including consultants, suppliers, contractors and other service providers to the Department.
- 4.4 Agencies and other parties receiving grants or allocated funds from the Department.
- 4.5 All other persons with a legitimate relationship with the Department.

5. AFCU MANDATE

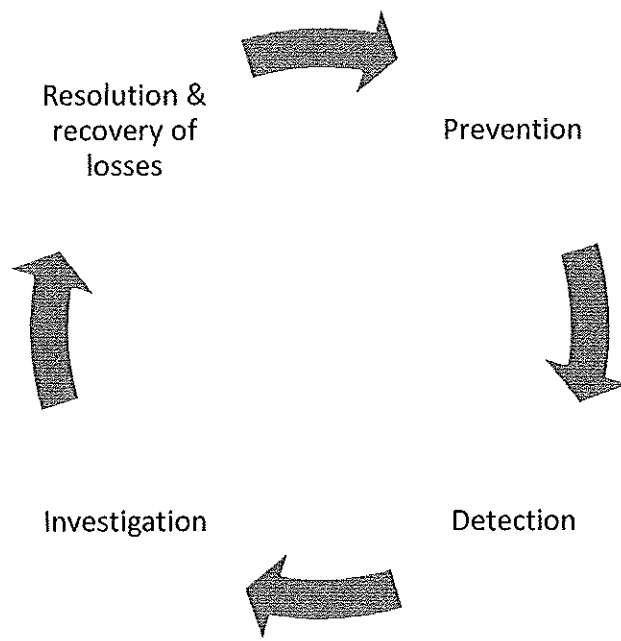
AFCU operates within a mandate delegated and endorsed by HOD in 2004, when the Unit was established, being:

- 5.1.1 To promote ethical culture and conduct in the Department by ensuring integrity in Department's operations and protect the Department against any reputational damage.
- 5.1.2 To investigate allegations of fraud, corruption and unethical conduct in the Department's operations.
- 5.1.3 To investigate financial misconduct (as defined in PFMA), against all employees of the Department and to investigate procurement irregularities as per the National Treasury Instruction SCM Instruction Note 3 of 2016/17 against employees and service providers
- 5.1.4 To assist in preventative efforts to protect Departmental funds from misuse and deter fraud and corruption in Department's operation.

6. STRATEGIC PILLARS

The Strategic Framework is built around four interrelated pillars:

- 6.1 Prevention
- 6.2 Detection
- 6.3 Investigation
- 6.4 Resolution and recovery of losses



6.1 Prevention

AFCU is now focusing on increasing attention and resources on its prevention efforts by advocating professional ethics and integrity in the department's operations. The principal objectives of these activities are:

- 6.1.1 Leadership of the Department setting the tone of an ethical culture by participating and championing ethics campaigns and programmes;
- 6.1.2 Implementation of effective training programmes on ethical leadership and ethics culture for internal and external stakeholders;
- 6.1.3 Appointment of a Senior Manager, Deputy Director General level, as Ethics Champion to coordinate and implement ethics programme as prescribed by the Public Service Regulations of 2016;
- 6.1.4 Education and awareness on the Code of Conduct through workshops and campaigns;
- 6.1.5 Workshops to educate employees and create awareness on fraud and corruption;
- 6.1.6 Effective ethics helpdesk to advise employees on ethical dilemmas, declarations of gifts and hospitality, remunerative work outside the public service, and declaration of interest and financial disclosure;
- 6.1.7 Consistent and efficient application of disciplinary measures as an integral component of effective fraud and corruption prevention;
- 6.1.8 Conducting fraud risk assessment to identify business areas of the Department exposed to high risk of fraud and strengthen control measures and put in place mitigating strategies;
- 6.1.9 Ensure compliance with relevant legislation and policies that are in place to combat fraud and corruption; and
- 6.1.10 To leverage the knowledge gained from investigations, fraud risk assessments and other relevant sources to provide practical and

timely advisory services to the Department's staff and Management on fraudulent and corrupt activities and unethical conduct.

Further preventative measures were introduced by the National Treasury Instruction No.3 of 2016/2017, Prevention Abuse in the Supply Chain Management System wherein Treasury stated that the purpose thereof is to provide guidance on measures to prevent and combat abuse in the Supply Chain Management System. Treasury prescribe as follows:

- 6.1.11 **Register of complaints.** The Accounting Officer must establish a system that deals with the management of complaints and or allegations of abuse in the Supply Chain Management System. Complaints that implicates the Accounting Officer must be reported to the relevant Treasury within 14 days calendar days of the receipt of the complaint, by the delegated official in relevant institution;
- 6.1.12 **Investigate complaints.** The Accounting Officer must initiate an investigation within 14 days of receipt of the complaint and or allegation of abuse. The investigation must be completed within 30 calendar days from date of initiation unless extension was approved the relevant treasury. The Accounting Officer must inform the relevant treasury of the outcome of the investigation, together with the proposed actions within 7 calendar days of receiving the investigation report;
- 6.1.13 **Implement remedial action.** The Accounting Officer must initiate disciplinary proceedings if the investigation report confirms the allegations of financial misconduct. Report such allegations to the South African Police Service (SAPS) within 7 working days if the investigation report confirms the allegations of a criminal nature. Inform Treasury, in writing, of any criminal case registered with SAPS within 7 days of the case being reported;

- 6.1.14 **Report outcomes.** The Accounting Officer must table the reports on the allegations received, outcome of the investigations and the remedial actions at the Provincial Legislature on quarterly basis;
- 6.1.15 **Restriction of Suppliers, Shareholders and Directors.** The Accounting Officer must notify the supplier and any other person of the intention to restrict by registered and the letter must amongst others provide for grounds for restriction, period of restriction which must not exceed 10 years, a period of 14 calendar days for the supplier to provide reasons why the restriction should not be imposed; and
- 6.1.16 **Deviation from normal bidding process.** The Accounting Officer must only deviate from inviting competitive bids in cases of emergency and sole supplier status. Any other deviation will be allowed in exceptional cases subject to the prior written approval from the relevant treasury.

6.2 Detection

The aim of anti-fraud and corruption detection efforts is to enhance the ability of the Department's staff, management and stakeholders to identify and report suspected fraudulent and corrupt practices and to strengthen anti-fraud and corruption capacity to identify such incidents proactively. This effort will be achieved by:

- 6.2.1 Promoting a culture of whistleblowing as a reporting mechanism to detect fraud and corruption;
- 6.2.2 Educating and capacitating all employees how to detect red flags of fraud and corruption and report such incidents;
- 6.2.3 Improving stakeholder's awareness of and access to the Department's whistleblowing mechanisms; and
- 6.2.4 Using the following tools to enhance proactive detection of fraud, corruption and unethical conduct:
- 6.2.4.1 Ethics culture surveys;
 - 6.2.4.2 National Anti-Corruption Hotline cases;
 - 6.2.4.3 Fraud Risk Assessments;

- 6.2.4.4 Auditor General's Reports findings;
 - 6.2.4.5 Findings on analysed financial disclosures;
 - 6.2.4.6 Identified potential and conflicts of interest; and
 - 6.2.4.7 Investigation findings
- 6.2.5 **Analysis of financial disclosures submitted by SMS members and designated employees including application for Remunerative Work Outside the Public Service (RWOPS) and declaration of interest by employees.**
- 6.2.5.1 The Ethics Officer shall conduct analysis of financial disclosures submitted by Senior Management Services (SMS) members annually to identify potential and/or actual conflict of interest.
 - 6.2.5.2 Analysis of financial disclosures is a tool to detect conflict of interest of SMS members and designated employees.
 - 6.2.5.3 Where interests (listed in Regulation 19 of the Public Service Regulations 2016) declared by an SMS member has potential or actual conflict of interest, the Ethics Officer shall on behalf of the Executive Authority (Member of the Executive Council [MEC]) consult with the employee concerned on appropriate steps to remove the conflict of interest and deal with the matter as prescribed in the Public Service Regulations 2016.
 - 6.2.5.4 The Ethics Officer is required in terms of the Department of Public Service and Administration's Guidelines on the performance of other remunerative work outside the public service, to gather all relevant information and/or facts when considering the application for Remunerative Work Outside the Public Service (RWOPS).
 - 6.2.5.5 Information and/or facts provided in the application form for RWOPS will help the Ethics Officer to make a determination whether there is potential and/or actual conflict of interest in

the remunerative work to be performed by the employee and provide appropriate recommendations to the Executive Authority.

- 6.2.5.7 Declaration of interests by employees who are members of Committees of the Department such as Bid Committees, Recruitment Panels shall be made available to the Ethics Officer for analysis to identify potential and/or actual conflict of interest.

6.3 Investigation

Investigation strategy (based on fully capacitated organogram of AFCU):
Cases whereof allegations of fraud, corruption and unethical conduct are reported and they warrant an investigation, cases are classified as follows:

- 6.3.1 Simple cases 30 days to investigate and provide a final report;
- 6.3.2 Medium cases 60 days to investigate and provide a final report; and
- 6.3.3 Complex cases 90 days or more AFCU to investigate and provide a final report.

In line with Cabinet instructions, the Department will provide the DPSA, through the Office of the Premier and the Gauteng Provincial Treasury with the following minimum information at the end of each financial year:

- 6.3.4 Number of allegations of corruption received and corruption cases detected per defined categories as defined in the Prevention and Combating of Corrupt Activities Act, 2004 and service delivery areas;
- 6.3.5 Number of allegations and cases referred to in (6.3.4) above:
 - 6.3.5.1 Handled in terms of disciplinary procedure;
 - 6.3.5.2 Referred to law enforcement agency or other body;
 - 6.3.5.3 Not investigated for disciplinary purposes or not referred;
 - 6.3.5.4 Description of corruption risk areas; and
 - 6.3.5.5 Report on the performance of its minimum anti-corruption capacity as part of its annual report.

6.3.6 The Public Service Regulations, 2016, Chapter 2, Anti-corruption and ethics management provides that the Head of Department shall—

6.3.6.1 Analyse ethics and corruption risks as part of the department's system of risk management;

6.3.6.2 Develop and implement an ethics management strategy that prevents and deters unethical conduct and acts of corruption;

6.3.7 Establish a system that encourages and allows employees and citizens to report allegations of corruption and other unethical conduct, and such system shall provide for—

6.3.7.1 Confidentiality of reporting;

6.3.7.2 The recording of all allegations of corruption and unethical conduct received through the system or systems;

6.3.8 Establish an information system that—

6.3.8.1 Records all allegations of corruption and unethical conduct;

6.3.8.2 Monitors the management of the allegations of corruption and unethical conduct;

6.3.8.3 Identifies any systemic weaknesses and recurring risks;

6.3.8.4 Maintains records of the outcomes of the allegations of corruption and unethical conduct; and

6.3.9 Refer allegations of corruption to the relevant law enforcement agency and investigate whether disciplinary steps must be taken against any employee of the department and if so, institute such disciplinary action.

6.3.10 How allegations of fraud and corruption should be reported.

6.3.10.1 **Step one:** The first step will be for the employee to raise the concern with his/her immediate supervisor/ manager. This may be done verbally or in writing;

6.3.10.2 **Step two:** If for whatever reason, the employee feels unable to raise the concern with his/her manager or feel that the matter is so serious that he/she cannot discuss it with any one in his/her business unit, the employee can approach the Director: Anti-Fraud & Corruption Unit as per below information:

Anti-Fraud and Corruption Unit
Bank of Lisbon Building
Cnr. Pixley Seme and Market Street
2nd Floor
(011) 355-4229/4326/4324 (tel.)
(011) 355-4327 (fax)
Email: EthicsDHS@gauteng.gov.za

Where a concern relates to a very sensitive issue or high profile such that it cannot be reported telephonically or by fax for security reasons, employees can call the AFCU and the necessary arrangement will be done;

6.3.10.3 **Step three:** If the above steps have been followed but the employee still have the concern or if an employee thinks that the concern is so serious that he/she cannot discuss it with any of the above, he/she must contact the Head of Department;

6.3.10.4 **MEC or Chapter 9 & 10 State Institutions:** Should an employee exhaust these internal mechanisms or where an employee has substantial reason to believe that there would be a cover-up or that evidence will be destroyed or that the matter might not be handled properly. He/she may raise the matter in good faith with a Member of the Executive Council (MEC) for Cooperative Governance, Traditional Affairs and Human Settlements in Gauteng, Member of the Provincial Legislature, procedures prescribed for in the Protected

Disclosure Act of 2001, State Institutions established in terms of Chapter 9 & Chapter 10 of the Constitution of the Republic of South Africa; and

6.3.10.5 **National Anti-Corruption Hotline:** The Department encourages communities and stakeholders or service provider who suspect fraud and corruption to contact the National Anti-Fraud Hotline that is administered by the Public Service Commission on 0800 701 701. The National Anti-Corruption Hotline is available 24 hours in all official language, you have an option to remain anonymous or identify yourself when reporting.

6.3.10.6 **Premier's Hotline:** The Premier's Hotline is aimed at accelerating service delivery in the province. Launched in 2012, the hotline will focus on improving service delivery by providing accurate, reliable and timeous information to the residents of Gauteng on all services rendered by government. Residents will also be encouraged to send opinions and recommendations, which will be used to improve service delivery. The hotline was informed by statistics released by the national Presidential Hotline, which showed that the majority of calls logged emanated from Gauteng.

6.3.11 Investigation conducted without interference:

6.3.11.1 All allegations of fraud, corruption and unethical conduct reported to the Department will be investigated without fear and favour;

6.3.11.2 No member of staff or Management may interfere with any investigation conducted lawfully in line with all relevant Legislation, Regulations, and Treasury Regulations after allegations have been reported for investigation.

6.3.12 Unethical conduct enquiries:

- 6.3.12.1 All allegations of unethical conduct reported to the Ethics Officer shall be recorded and an enquiry conducted to establish whether or not the allegations reported are valid or not.
- 6.3.12.2 The Ethics Officer shall compile a report for the attention of the Head of Department and recommend remedial action to be taken to deal with the unethical conduct.
- 6.3.12.3 Where upon assessment by the Ethics Officer, the allegations are beyond unethical conduct (fraud and corruption) the matter shall be referred to the Investigations Sub-Directorate of the Anti-Fraud & Corruption Unit for further processing.

6.4 Resolutions and recovery of losses;

The AFCU will continue to recommend to the HOD on resolute measures to be implemented where investigation findings reveal that the Department suffered financial loss as a result of fraud and corruption.

6.4.1 Where fraud and corruption is found to have been committed by employees, management, stakeholders, service providers, the following measures will be recommended:

- 6.4.1.1 Resolution of procurement irregularities allegations in line with the National Treasury Instruction No.3 of 2016/2017, Prevention Abuse in the Supply Chain Management System;
- 6.4.1.2 Disciplinary action in terms of the Code of Conduct and Public Service Regulations applicable;
- 6.4.1.3 Criminal prosecution in terms of criminal justice system with the assistance of law enforcement agencies;

6.4.1.4 Recovery of losses suffered by the Department through civil litigation process with assistance of Legal Advisory Services; and

6.4.1.5 Any other legal remedies at the Department's disposal

7 ACCOUNTABILITY

7.1 The AFCU reports monthly, quarterly and annual to the HOD and the MEC;

7.2 The AFCU further reports to the Audit Committee and the Risk Management Committee in the Department;

7.3 Externally the Department reports to the Gauteng Legislature, Public Service Commission, National Department of Human Settlement, Department of Public Service and Administration, Office of the Premier, the Provincial Anti-Corruption Coordinating Committee (PACCC), and the Provincial Treasury;

7.4 Provides required information and evidence to The Presidency, Planning, and Monitoring & Evaluation and the Office of the Premier in its management of the Management Performance Assessment Tool (MPAT).

8 HUMAN AND BUDGETARY RESOURCES

8.1 Preventing and investigating corruption requires an adequate commitment of professional resources to investigate allegations of misconduct or corrupt and fraudulent activity.

8.2 Therefore the following activities have been identified:

8.2.1 Pursuing a focused recruitment strategy to increase and diversify staffing along multiple and functional lines;

8.2.2 Reduce the "case to investigator" ratio, so as to improve turnaround time of investigation process;

8.2.3 Increase capacity to meet escalating demands;

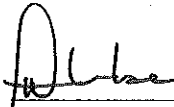
- 8.2.4 Reduce historical dependency on service providers to augment AFCU limited capacity, as this practice has proven to be cost-inefficient and operationally unsound.
 - 8.2.5 Membership of professional bodies such as the Association of Certified of Fraud Examiners (ACFE) and the Ethics Institute of South Africa.
 - 8.2.6 Strive for Investigators to be Certified Fraud Examiners (CFE), an international recognised designation conferred by the ACFE.
- 8.3 The Anti-Fraud and Corruption Unit is committed to cost cutting measures as prescribed by the National Treasury and will eliminate dependency on service providers to provide investigative, forensic investigations services and instead elect to recruit full time staff members with the required skills. Recruitment of staff to provide these services in-house, will shift these resources to building up needed expertise, and documenting lessons learned.

9 ADOPTION AND REVIEW OF STRATEGY

- 9.1 The strategy makes a major shift towards proactive interventions to prevent, detect, and investigate allegations of fraud, corruption and unethical conduct and to recover monetary losses through high priority investigation that will demonstrate impact and commitment of the Department in fighting fraud and corruption.
- 9.2 The strategy is that of the Department, approval and adoption thereof will be done by the Head of Department and the Member of the Executive Council.
- 9.3 The strategy is a three year plan for the Department and will be reviewed annually or as when there are changes in the legislative and policy environment are gazetted or promulgated to accommodate new strategic inputs. The effective implementation of the Department in embracing the

strategy and in leading by example and setting the tone at the top as envisaged by the Public Service Regulations 2016.


10 APPROVAL AND ADOPTION OF THE STRATEGY



Mr. Mpendulo Radebe

Acting Director: Anti-Fraud and Corruption Unit

Date: 13/12/2016



Ms. Matilda Gasela

Head of Department: Department of Human Settlements

Date: 03 FEBRUARY 2017

Approved



Not Approved

