

Gauteng Office of the Premier

**Forensic investigation on behalf of the Gauteng
Office of the Premier into allegations pertaining
to Driving Licence Testing Centres within the
Gauteng Department of Roads and Transport**

Executive Summary

**Strictly private and confidential
August 2022**

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Attention: Ms Lebogang Sikwe

Director: Provincial Forensic Audits

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27 August 2022

Dear Ms Lebogang Sikwe

Executive Summary: Forensic investigation on behalf of the Gauteng Office of the Premier (“OoP”) into allegations pertaining to Driving Licence Testing Centres (“DLTCs”) within the Gauteng Department of Roads and Transport (“GDRT”)

1. In terms of our proposal dated 14 May 2021, we were appointed to investigate various allegations pertaining to the Gauteng DLTCs.
2. This Executive Summary only addresses our mandate, the key findings and recommendations of the investigation.
3. Should you have any comments please do not hesitate to contact me on (011) 312 4693 or 082 442 2780 or JabuM@ligwa.co.za.

Yours faithfully



Jabu Mahlangu

Director

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BACKGROUND AND MANDATE

1. In terms of our proposal dated 14 May 2021, we were appointed to investigate various allegations pertaining to the Gauteng DLTCs covering the period 01 April 2019 to 30 May 2021, which allegations relate to:
 - 1.1 The online booking process;
 - 1.2 Allocations of slots for learners and drivers' licence testing;
 - 1.3 Allegations around "fee dumping";
 - 1.4 Operational deficiencies of the Live Enrolment Unit ("LEU") system currently utilised for eye testing;
 - 1.5 Collusion between examiners, applicants and driving schools where kickbacks are paid for issuing of learners and drivers' licences;
 - 1.6 Possible conflicts of interest whereby licencing officials also own, directly or indirectly, driving schools; and
 - 1.7 Non-compliance with the circular issued by the MEC in November 2020.

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KEY FINDINGS

THE ONLINE BOOKING SYSTEM AND ALLOCATION OF SLOTS

Functioning of the online booking system

1. The online booking system was launched in an attempt to address the ongoing fraud and corruption that had been taking place at the DLTCs in terms of the booking of slots. The effect was that it took control of booking slots away from the DLTCs by implementing an online platform whereby applicants book their own slots on an online portal.
2. The DLTCs release available time per examiner against certain transactions to RTMC on Mondays and Tuesdays, based on an individual DLTCs' capacity. The Road Traffic Management Corporation ("RTMC") in turn processes the available time into slots per transaction and release booking slots on the online booking portal.
3. Once an online booking has been made by an applicant, the eNatis system allocates a unique reference number to the applicant, which is verified when the applicant goes to the DLTC to perform a transaction.
4. Without the unique reference number, an applicant would not be able to conclude any transaction at the DLTC as the eNatis system will block the applicant from finalising any transaction once they reach the cashiers.
5. DLTCs have no ability of releasing the slots on the online portal, nor to reserve any slots.
6. Once an online booking for driver and learner licence testing is made, the applicant is required to present themselves at the DLTC within three (3) days of making their booking to pay a confirmation fee. If an applicant does not present themselves within the three (3) days and makes the confirmation payment, then the slot is automatically released back to the online booking portal at 08h00 following the third day of making the booking.

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7. Applicants who make online bookings for the renewal of their driver licence and PrDPs are, however, not required to pay a confirmation fee and thus there is no requirement for the applicants to present themselves at the DLTCs within three (3) days of making the booking, or to pay a confirmation fee to confirm their booking.
8. There are instances where an applicant may present themselves at a DLTC on the day of their appointment and cannot be assisted due to operational and/or technical difficulties experienced by the DLTC, such as LEUs not being operational, loadshedding and/or temporary closure of the DLTC due to COVID-19.
9. The above led to a 14-day window period being introduced whereby the unique booking reference number allocated to an applicant is kept active for a period of 14 days to provide an opportunity for the applicant to return to the DLTC at a later date within the 14-day period to continue with their transaction, without having to book a new slot online.
10. Whilst the above 14-day window period sought to assist the members of the public, it also created a window of opportunity for members of the public who make online bookings for driver licence renewals and Public Drivers Permits (“PrDPs”), who are not required to confirm their slots and pay a confirmation fee, to not attend at the DLTC on the date and time of their appointment but rather attend at a later date and time within the 14-day window period.
11. This, according to management of some of the DLTCs, leads to congestion as the DLTCs tend to end up with more people showing up than those booked for particular days.
12. The current version of the Standard Operating Procedures (“SOPs”) utilised by DLTCs predates the introduction of the online booking system and have not been amended to incorporate updated procedures relating to the system.

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Consultations with DLTCs regarding the online booking system

13. The main challenges raised by the DLTCs regarding the online booking system were:
 - 13.1 RTMC does not release the slots in time or fails to release all the slots made available by the DLTC, however:
 - 13.1.1 RTMC informed us that this is done to prevent “runners” from clogging the system and booking all the slots made available at once; and
 - 13.1.2 The decision to stagger the release of the slots throughout the day and throughout the week assists to ensure that applicants have opportunity to access the online booking system at various times and potentially be able to secure a slot.
 - 13.2 Some members of public do not honour their slots and take advantage of the fact that their online bookings remain valid on the eNatis system for a period of 14 days, which may lead to congestion at the DLTCs as these applicants may choose to show up on any day within the 14-day window period; and
 - 13.3 Capacity constraints due to unexpected closure of the DLTCs due to COVID-19 during the pandemic period and due to loadshedding.

Issues identified with “runners”

14. The online booking system effectively took control of booking slots away from the DLTCs; however, it also created a new opportunity for “runners”, who act as intermediaries, to profit from a system that sought to root out fraud and corruption.
15. The system has introduced a potential revenue stream for these “runners” that is funded by members of the public who:

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- 15.1 Struggle to secure a booking slot online due to the lack of slots being available at the time they access the online system to search for a slot;
 - 15.2 Do not have access to internet or a smart device that they can use to access the online booking system;
 - 15.3 Are not technologically proficient and may have challenges accessing the system, especially considering the timeout the eNatis has when booking a slot; and
 - 15.4 Can afford to pay the additional “fee” by securing the service of a “runner” as it is convenient and saves them the effort and time of having to secure a slot themselves.
16. We obtained the online booking data for the period 01 April 2019 to 31 May 2021 and subjected the data to analytical review. From a total of 570 617 online bookings analysed, we identified a total of 2304 mobile numbers that were utilised to make more than five (5) online bookings during the period, presumably by runners.
17. We extracted the top 25 numbers that were identified to be linked to multiple bookings. The top 25 numbers were also subjected to social media searches, which revealed instances where the individuals advertised to offer the services of booking online slots, in exchange for fees ranging between R150.00 to R200.00 per booking.
18. We further found that the top 25 mobile numbers alone represent 13 158 of the 570 617 online bookings, with the top number being associated with 1915 online bookings spread across 33 Gauteng DLTCs.
19. From the data analytics performed on the booking data, it is clear that there are individuals and businesses that are profiting from an online service that is supposed to be free and accessible to all South Africans.

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20. Currently the National Road Traffic Act, 93 of 1996, does not provide for any prohibition on the activities of “runners”.

Demand for slots

21. There is indeed a high demand for slots from members of the public and a general sense of frustration amongst members of the public owing to the issue of the availability of slots. From our investigation, the availability of these slots is wholly dependent on the resources available at the DLTCs, which the DLTCs communicate to RTMC on a weekly basis.
22. Several members of public have also indicated that due to difficulties to secure a booking at their closest DLTC, they often need to travel long distances to other DLTCs.
23. Notwithstanding the frustration expressed regarding the non-availability of slots, we obtained data for the period 01 April 2019 to 31 October 2020 and from our analytical review determined that a total amount of 43 351 online booking slots were booked but not honoured during this period.
24. The above shows that some members of the public also contribute the unavailability of slots by not honouring their bookings and presumably end up making another booking at a later stage.
25. No exercise has been conducted by GDRT to date to determine what the optimal capacity of an individual DLTC should be, relative to the needs of the members of public in the area to determine whether the current DLTCs are adequately resourced.
26. There are also no KPI's that DLTCs are required to meet. Slots are simply released based on the DLTCs resource availability at the given time.

REVIEW OF OPERATIONAL ISSUES WITH LEU MACHINES

27. The LEU system acts as a live in-moment system that tests an applicant's eyesight and electronically captures their fingerprints and photograph. The system further

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links to other databases such as Afiswitch and SAPS to pull through criminal records, if any, of applicants.

28. The LEU system then shares this data with DLCA, who in turn then manufactures and delivers the driver licence cards.
29. The Driver Licence Card Account (“DLCA”) is the entity that has control over the maintenance of LEU machines and the production of driver licence cards in South Africa. These functions were initially outsourced by DLCA to an entity named Prodiba.
30. The Live Capture Unit (“LCU”) was initially introduced by DLCA, via Prodiba, as a system to try and modernise the DLTCs and improve efficiency and quality. Following the expiry of the contract with Prodiba, DLCA took over the production process and began to modernise the system by doing away with the LCU system and introducing a new LEU system, which sought to bring down the delivery time of producing and issuing driver licence cards down from 21 days to seven (7) days.

Challenges with the LEU system

31. Although DLCA sought to modernise the DLTCs by implementing the LEU machines, challenges are faced by the DLTCs in terms of the bandwidth requirements of the LEUs relative to available network infrastructure at the DLTCs, as well as the poor service delivery by DLCA, as expressed by the DLTCs, when it comes to troubleshooting and maintenance.
32. DLCA maintains that it is the outdated network infrastructure of the DLTCs that is contributing to the slowness of the system, as well as the fact that the DLTCs switch off the LEU machines in the evenings, during which time the LEU machines are supposed to upload data to DLCA.
33. The often-unstable infrastructure, be it due to the sub-standard network infrastructure of the DLTCs and/or lack of maintenance by DLCA, leads to the DLTCs not being able to service clients at times, which contributes to the frustration by members of the public and an increasing backlog in service delivery.

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34. There is no apparent reporting structure in place whereby all breakdowns or related issues with the LEU machines can be logged and monitored centrally by the GDRT to ensure that DLCA is meeting the requirements as set out in their SLA. Further to this, the SLA is not between GDRT and DLCA, but rather between the Department of Roads and Transport (“DRT”), which may present GDRT with issues should they attempt to enforce the provisions directly.

Potential corruption with Optometrist certificates

35. Whenever LEU machines are down and applicants cannot have their eyes tested, or when applicants fail their eye tests, they are referred to an Optometrist to be tested and be issued with Optometrists certificates, where appropriate.
36. An Optometrist that is in good standing with the HPCSA may approach the South African Optometrist Association (“SAOA”) to be issued with Optometrist certificates. These certificates are individually marked with a unique serial number that is recorded in a register once dispatched to an Optometrist.
37. “Runners” and other intermediaries have, however, taken advantage of this as well and produce fraudulent certificates using the details of registered Optometrists and sell these certificates to members of the public.
38. The DLTCs have no controls on their systems to verify that the certificate is valid and indeed issued by a registered Optometrist in good standing with the Health Professions Council of South Africa (“HPCSA”). This may also result in applicants without the requisite visual ability being issued a drivers’ licence, exposing themselves, their passengers and other motorists to significant risks.
39. It was discovered that fraudulent Optometrist certificates are being sold at the Alberton DLTC bearing the details of a duly registered Optometrist from Vanderbiljpark, without their knowledge. Through the sample of Optometrist certificates we reviewed, a total of four (4) fraudulent certificates were identified and confirmed to be fraudulent by both the SAOA and the Optometrist whose

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details were fraudulently used to complete the certificates. Instances of these fraudulent certificates have further been identified in Vereeniging.

PrDP medical certificates

40. As with the Optometrist certificates, there is no verification done on the LEU system to ensure that the PrDP medical certificates are indeed completed by a medical practitioner.
41. This certificate in fact has less controls than the Optometrist certificates, as it is a form that is easily accessible online or at the DLTC and completed by a medical practitioner.
42. Even if a control was implemented to verify that the medical practice number and medical practitioner details completed on the form are indeed those of a duly registered medical practitioner, there are no controls in place to determine whether it is indeed the medical practitioner that conducted the medical examination, if any, and issued the certificate. There is also no control in place to determine if the medical practitioner's details and signature were potentially forged.
43. Due to the form being a publicly accessible document, there is also no control through serial numbers to allow for tracking of these.

INVESTIGATION OF FEE DUMPING FROM THE REGISTERING AUTHORITY PROCESS

Fee dumping

44. From our various consultations we understand the process of fee dumping to be as follows:
 - 44.1 Upon renewal of a vehicle licence, the owner of a vehicle would query from a registering authority official the total amount of outstanding motor vehicle licence fees linked to their Traffic Register Number ("TRN");

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- 44.2 This would then be calculated on the system and be provided to the individual in order to renew;
 - 44.3 Where there are arrears on the motor vehicle licence fees, the individual would be required to settle the arrears before being able to renew the motor vehicle licence for the current period, depending on the options applied to the eNatis system at the time;
 - 44.4 Allegedly, instead of settling the arrears, a change of ownership transaction would then be initiated, whereby the motor vehicle ownership would be transferred with its arrears onto the TRN of a deceased person; shell entity; fake TRN; or even a random individual (the “temporary owner”);
 - 44.5 Once the transfer of ownership of the motor vehicle is completed (the “dumping”), the Motor Vehicle Registering Authority (“MVRA”) official would then process another change of ownership, to move the motor vehicle back to the original owner, leaving the arrears on the name of the deceased person, shell entity or fraudulent/fake TRN profile, thereby “dumping” the arrears fees; and
 - 44.6 With the arrears fees being dumped and the ownership changed back, the individual can then process their current renewal without having to pay for the fees in arrears, resulting in the arrears fees remaining on the TRN profile the fees were dumped on.
45. Due to the fact that the eNatis system did not initially prevent licencing transactions in instances where arrears existed, change of ownership transactions could be processed which led to:
- 45.1 The actual dumping of arrears fees on TRNs associated with deceased persons; fake TRN's; shell entities or unrelated persons; or
 - 45.2 The processing of change of ownership of vehicles to new owners without collecting the arrears fees from the original owner, leaving the arrears fees

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on the TRN of the original owner with the possibility of GDRT not collecting the arrears fees.

46. The eNatis system is not linked to the Department of Home Affairs, thus the system cannot detect if a person is deceased, nor can it detect if potentially fraudulent documentation is being utilised to register a TRN.
47. During 2016, the previous management company of the eNatis system, Tasima (Pty) Ltd (“Tasima”), had identified instances where officials from various MVRAs had potentially dumped outstanding motor vehicle licence fees.
48. We reviewed the above-mentioned Tasima database and noted that the data identified a total of 4912 potential fee dumping transactions that took place within Gauteng over the period 01 January 2008 to 31 March 2016, which amounted to a sum total of R38 757 495,91 of arrears motor vehicle licence fees that had potentially been dumped.
49. From consultations with GDRT we determined that the Gauteng data was shared with GDRT, who in turn shared the data with the respective Municipal DLTCs to conduct further investigations, whilst GDRT initiated investigations into the Provincial DLTCs.
50. From the limited information we have been provided with, we understand that due to the jurisdiction, the GDRT could only suspend access rights to eNatis of the officials identified but could not initiate any disciplinary actions against any officials employed at municipal MVRAs, as this was the responsibility of the respective municipalities.
51. At the provincial DLTCs, several staff members were suspended and their access right to eNatis revoked, however disciplinary proceedings were never concluded as the GDRT officials were allegedly threatened by members of the public. The matters remain unresolved.

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52. RTMC informed us that since August 2016, the eNatis system had been updated to ensure no licensing transaction could be performed without first settling any arrears linked to the TRN of an individual/entity.
53. We selected a sample of 30 transactions from the Tasima dataset and requested details of these from RTMC. From our investigation of these, we established that:
- 53.1 The transactions do not relate to instances where changes of ownership were processed to dump the arrear fees and then subsequently transferred ownership back to the original owner;
- 53.2 Instead, these revealed instances where changes of ownership were processed from one individual/entity to another, without first collecting the arrear fees and penalties from the initial owner who was liable for the arrears. These arrear fees, however, remained linked to the TRN of the initial owner, even after the change of ownership;
- 53.3 This was due to a potential weakness in the eNatis system at the time, as the system allowed for the processing of changes of ownership to take place, even if there were arrears linked to the vehicle;
- 53.4 We identified 13 officials who processed the above transactions, one of which informed us that this has been an accepted practice throughout the province. This official had also been on suspension with full pay regarding this matter for five (5) years; and
- 53.5 Considering the above, there may likely be a large sum of motor vehicle licence arrears and penalties that may potentially remain uncollected should the individual/entity not have needed to perform any licencing transaction post August 2016, whereupon the system would identify the arrears and prohibit any licence renewals until the arrears were settled.

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COLLUSION BETWEEN EXAMINERS, APPLICANTS AND DRIVING SCHOOLS AND POSSIBLE CONFLICTS OF INTEREST

Driving schools and links to officials

54. Whilst there are suspicions of links between driving schools and DLTC officials, finding evidence to support these matters has proven difficult in light of the following:
- 54.1 Driving schools operate as sole proprietorships and are not always registered with CIPC. There is currently also no requirement for driving schools to be registered with the DRT either; and
 - 54.2 We established that licencing officials usually do not own driving schools in their own names but rather work through family members who own the driving schools, thus removing any direct link, be it on paper or flow of funds.
55. We conducted social media searches on driving schools throughout Gauteng and selected a sample of 24 driving schools which we contacted to determine their services and fees.
56. From the sample of driving schools we contacted, we noted, inter *alia*, the following:
- 56.1 Seven (7) of the driving schools offered a “guaranteed pass”;
 - 56.2 The going rate for a “guaranteed pass” was R6500,00 and included the applicant’s learner licence and driver’s licence;
 - 56.3 Some driving schools informed us that with the guaranteed pass, the applicant does not have to study anything and will receive assistance with the learner licence test; and

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- 56.4 One (1) driving school further informed us that there is an option available where the applicant does not have to do the driver's licence test themselves to obtain their driver's licence.
57. We further consulted with and obtained an affidavit from a member of public, who provided information of an incident at the Xavier DLTC whereby a driving school contacted her and notified her that she would be required to pay a bribe if she wanted to pass her driver's licence test.

Other control issues

58. There are no controls in place to identify or deter possible fraud and corruption whilst examiners conduct the drivers' tests, especially once they leave the yard to conduct the road test.
59. In most instances, there are no CCTV cameras in place in both the yard and within the DLTCs, especially over the CLLT venue, which can at least be monitored on a sample basis by a party independent to the DLTC to flag potential irregularities.

Lifestyle audits on DLTC officials

60. In order to establish any indicators of any officials that may be involved in corrupt activities, we conducted lifestyle audits on 912 Gauteng DLTC officials by taking into account assets owned by, credit commitments and salary information of these officials.
61. Our starting point was officials who had multiple vehicles registered in their names which were also not financed.
62. From this exercise, we identified 13 officials whose assets and credit commitments were not commensurate with their salaries.
63. Consultations were held with the 13 officials wherein various explanations were provided for multiple vehicles and properties registered in their names. Whilst some of the officials did indeed confirm having other sources of income, we could not confirm this other income, nor could we ascertain the legality of same.

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64. Although draft affidavits have been drawn up and communicated to the officials for their review and finalisation, as requested by them, we have at the date of this report only received a total of eight (8) signed affidavits/statements.
65. Based on the responses received and lack of supporting information such as bank statements, consideration may be given to approach local law enforcement to assist in obtaining bank statements of the following officials to conduct a more detailed lifestyle audit exercise on the officials.

Annual declaration of interest

66. Although there currently is no express requirement in the SOPs that require DLTC staff to submit annual declarations of interest, this is a requirement as required in terms of the Public Service Act, 30 of 2007, and the Public Service Regulations, 2016.
67. Through our engagements with the DLTC officials we consulted with in terms of our procedures relating to lifestyle audits, we were informed that they were either not aware of the requirement to disclose other remunerative work or that they believe it is only required in instances where this is in conflict with the work they perform at the DLTCs.
68. The 13 officials we identified through our lifestyle audits were further not able to provide us with any evidence of them having declared the other remunerative work.

NON-COMPLIANCE TO DEPARTMENTAL POLICIES, PROCESSES AND PROCEDURES

MEC circular 01/2020

69. Due to the COVID-19 outbreak and the various restrictions that followed the initial lockdown the country was subjected to, members of public whose drivers licences or PrDPs had expired were not able to renew these due to various reasons related to the pandemic.

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70. On 11 November 2021, the MEC issued a Circular instructing all DLTCs to immediately allocate 70% of their resources to the renewal of drivers licences and PrDPs in order to deal with the severe backlog. A further handwritten note on the Circular read that Provincial DLTCs were to allocate 80% of their resources, and not 70%. This was further confirmed with various DLTCs we consulted with.
71. Our approach to determine whether DLTCs complied with the above-mentioned circular issued by the MEC was to consider the total transactions performed by the DLTCs relative to those referred to in the Circular, being the renewal of drivers licences, applications and renewals of PrDPs.
72. From an analytical review of the DLTC transaction data received from GDRT for the period 01 December 2020 to 31 August 2021, we determined that the following DLTCs did not comply to the MEC's circular as indicated by the resources allocated being below either the 70% (Municipal) or 80% (Provincial) stipulated:
- 72.1 Temba (59%);
 - 72.2 Kagiso (54%);
 - 72.3 Mabopane (70%);
 - 72.4 Xavier (68%);
 - 72.5 Alberton (63%);
 - 72.6 Boksburg (62%);
 - 72.7 Edenvale (67%);
 - 72.8 Fochville (66%);
 - 72.9 Germiston (61%);
 - 72.10 Krugersdorp (66%);
 - 72.11 Bronkhorstspuit (63%);
 - 72.12 Langlaagte (61%);
 - 72.13 Midrand (64%);

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72.14 Randfontein (66%); and

72.15 Westonaria (50%).

Expired Service Level Agreements

73. During consultations with GDRT, we established that there were a number of Municipal DLTCs that were operating under expired SLAs and were now operating month to month, apparently due to GDRT and the Municipalities not agreeing on the terms of the SLAs, including the high agency fees the Municipalities sought.

74. After a follow up with GDRT on the current status of the expired SLAs, we were advised that the following Municipalities were still operating under expired SLAs:

74.1 City of Johannesburg;

74.2 City of Tshwane;

74.3 Merafong;

74.4 Rand West City; and

74.5 Mogale City.

OTHER MATTERS IDENTIFIED

Potential corruption taking place at MVRAs

75. From our consultations with MVRA management, we were informed that certain MVRA officials offer a service to members of the public who do not wish to stand in long queues to renew their motor vehicle licences. In exchange for a fee, MVRA officials would then collect the applicants documents and process the motor vehicle licence renewal without the owner of the vehicle being present at the MVRA.

76. We were informed of a recent case at the Vanderbijlpark MVRA that was being investigated by RTMC. Several MVRA officials were found to have been processing motor vehicle licence renewals for parties without having received

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payment, or there being any documentation saved on the eNatis system for the transaction. This was detected through the bank reconciliation.

Maintenance of the licencing centres

77. During our site visits, we noted that the following two (2) DLTCs and MVRAs were in a dilapidated state in terms of maintenance:

77.1 Vereeniging:

77.1.1 We were informed that the entire MVRA side of the building had been declared unsafe and thus the MVRA officials were removed;

77.1.2 There were MVRA officials who were not public facing that were working in the MVRA side at their own risk;

77.1.3 In certain areas of the building, the ceilings had collapsed and there were certain areas where the roof itself was damaged to an extent that one could easily gain access to the DLTC via the roof due to the large holes and collapsed ceilings; and

77.1.4 There were no operating security and access controls at the DLTC. Our team members were able to walk right in from the street and gain access the cashier's office where we noted cash on hand that was not even secured in a safe.

77.2 Mabopane:

77.2.1 We noted that the entire MVRA side of the building had significant damage, which according to the Centre Manager, was a result of a bombing attack a few years back, and resulted in the MVRA being moved to a smaller space that could not house enough cashiers to accommodate the demand;

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- 77.2.2 The Centre Manager informed us that no progress had been made to date to get the MVRA side repaired;
- 77.2.3 In order to access the offices where the DLTC and MVRA staff work, one needed to go through the MVRA section that was not operational; and
- 77.2.4 The grounds themselves were not well maintained and presented security risks.

Vehicle Testing Stations

- 78. We noted that very few of the DLTCs have a Vehicle Testing Station (“VTS”) that are operational. We requested feedback from the management of the DLTCs where they have VTS that is not operational, and they advised that the majority of the DLTCs have issues with the equipment being outdated or needing calibration and that there is no funding for this.
- 79. We noted that only the following stations had VTSs that were operational:
 - 79.1 Heidelberg;
 - 79.2 Kempton Park;
 - 79.3 Meyerton;
 - 79.4 Randfontein;
 - 79.5 Vereeniging; and
 - 79.6 Springs.

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RECOMMENDATIONS

1. We below set out our recommendations based on our above findings.
2. Regarding the additional applicants who need to be processed at DLTCs on certain days as they could not be assisted on their booked days for whichever reason, but are still within the 14-day period, we recommend that GDRT consider the following:
 - 2.1 In the event that an applicant attends a DLTC on the day of their booking and cannot be assisted due to operational or technical issues, the DLTC management should record their details and require them to return on a particular, dedicated day of the week;
 - 2.2 The DLTC should then share this information with RTMC so the latter should, on the day that the above applicants are to return, avail less online slots which take into account these applicants who need to return to be serviced on that day;
 - 2.3 This should assist with the current challenge of congestion due to applicants returning on days that are already fully booked; and
 - 2.4 If a returning applicant does not present themselves on the day of their booking, the DLTC should notify RTMC to cancel the booking, which will require the applicant to make a new booking on the online booking portal.
3. GDRT should request RTMC to ensure that the online booking system is updated to prevent multiple bookings from being made which are linked to the same mobile number.
4. GDRT should update the DLTC SOPs to include procedures relating to the online booking system, following which training for all the DLTC officials should be considered.

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5. In order to facilitate efficient servicing of applicants at the DLTCs and also mitigate the issue of “runners”, GDRT should request that RTMC ensure that the following information is set out on the online booking system:
 - 5.1 A list of documentation that will be required to be submitted by an applicant at the DLTC;
 - 5.2 The associated fees for the transaction they are booked for;
 - 5.3 An indication whether the DLTC operates cashless or not;
 - 5.4 The address of the DLTC; and
 - 5.5 A security reminder that no security guard or licencing official may request a fee for access to the DLTC or to obtain the forms that need to be completed.

6. To further assist with the issue of “runners” we recommend that GDRT consider the following:
 - 6.1 All DLTCs should have proper signage outside the DLTC setting out the transactions the DLTCs can perform, and the relevant costs associated. It should further also be clear whether a DLTC is operating cashless or not, and that no official or individual may request payment other than a cashier, who will provide the applicant with an official receipt for payment;
 - 6.2 DLTCs should exercise effective physical access controls at the DLTCs premises by insisting on booking reference numbers in order to prevent “runners” from gaining access to the DLTC premises;
 - 6.3 Where DLTCs and MVRAs share the same buildings, we recommend that proper separation be applied by means of access-controlled partitions to ensure that “runners” entering the MVRA side cannot make their way to the DLTC area without having to go through a security check to ensure they have a booking;

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- 6.4 Where driving schools seek entry to the DLTC yard to assist the applicant with a driving school vehicle, they need to be accompanied by the said applicant, who has a booking reference, otherwise access by driving schools vehicles to the DLTC and yard area should be prohibited;
 - 6.5 An awareness drive or campaign aimed at informing the public not to make use of “runners”; and
 - 6.6 In light of the runners identified and considering that such actions by them may not be necessarily illegal in terms of the current legislation, consideration should be given to appropriate action to be taken as these runners benefit from unsuspecting public members who end up paying for services that should not necessarily be paid for.
7. In light of the increased demand for slots, we recommend that GDRT conduct an assessment to determine the optimal capacity for each DLTC to service clients in the specific area the DLTC operates in. The assessment should facilitate identification of additional resources required, if any.
 8. Regarding the LEU system, we recommend that GDRT consider:
 - 8.1 The implementation of an online portal that links DLCA; RTMC; DLTCs and GDRT; whereby complaints on the LEU system can be logged and tracked in real time and be considered. In instances where DLCA is not delivering in terms of the turn-around times as per the SLA, the system should automatically flag this;
 - 8.2 Conducting a review of the network infrastructure requirements for the LEU’s as determined by DLCA against the current status of the DLTC network infrastructure. Where it is found that the infrastructure is below the requirements, GDRT should initiate steps to improve such network infrastructure to better service the public. The network requirements and maintenance thereof should further also form part of the SLA’s between

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- the GDRT and the Municipalities to ensure that the Municipal DLTCs also have the required network infrastructure in place to best serve the public;
- 8.3 Informing all the Gauteng DLTCs of the requirement that the LEU machines should not be switched off in the evenings, so as to allow the data to synchronise to DLCA after hours; and
- 8.4 Follow up and hold DLCA accountable for any LEU downtime suffered by the DLTCs which is attributable to the LEUs not being attended to in line with the SLA.
9. Considering the potential fraud and corruption that is taking place with the usage of the Optometrist Certificates, we recommend that GDRT:
- 9.1 Together with DLCA, SAOA and RTMC, consider implementing a new system for Optometrists whereby they are linked to the HPCSA via an online portal. Optometrists in good standing can then capture the results of the eyes tests on the system, which will then upload the test results directly into the eNatis system;
- 9.2 In the event the above recommendation takes time to be tested and implemented, consideration should be given to have the serial numbers of the certificates issued by the SAOA to Optometrists recorded on the eNatis system so that when an Optometrist certificate is tendered by an applicant, the serial number can be captured for automatic validation of the certificate by the LEU system; and
- 9.3 The above recommendation should be considered for medical certificates issued by general practitioners as well that are used for PrDPs.
10. Regarding the potential fraudulent Optometrist Certificates that were identified at the Alberton DLTC, the GDRT should register a criminal case with SAPS.

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11. Regarding our findings that certain driving schools offer a guaranteed pass which may point to likely collusion between driving schools and DLTC officials, we recommend that GDRT refer these to law enforcement for further investigation to be undertaken.
12. Regarding the apparent attempt by a driving school representative to solicitate a bribe from Ms Twaya at the Xavier DLTC, GDRT should consider registering a case at SAPS for further investigation to be undertaken.
13. Regarding the officials who were arrested at the Benoni DLTC but were not convicted and were allowed to return back to work, we recommend that GDRT and/or DLTC management should establish the reasons for the withdrawal of the matter and that the GDRT should insist that the DLTC conduct its own disciplinary hearing into the matter.
14. The GDRT should consider finalisation of the disciplinary action against all the officials who were identified as having processed vehicle change of ownership without first recovering the arrears owing by the previous owners. This should, however, take into account the fact that this seem to have been an accepted practice and the eNatis system allowed for this to happen.
15. The GDRT should consider recovery of the arrear fees that were not recovered upon change of ownership prior to August 2016. The GDRT should, however, consider the time elapsed for such debt, insofar as prescription may be an issue, the volume of the balances in relation to the amounts owing, and the uncertainty as to whether the previous owners may still be alive or in existence.
16. With regard to the officials who have been suspended for inappropriately long period of time for fee dumping as was identified in our investigation, the GDRT should establish reasons thereof and consider appropriate action against officials who allowed for this to happen.
17. GDRT should engage with RTMC to have the eNatis system linked to the Department of Home Affairs database, alternatively allow for verification of details

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- against the Department of Home Affairs database, in order to ensure that no TRNs can be registered using fraudulent details or details associated with deceased persons.
18. We recommend that GDRT make provision in the SOPs and SLAs between GDRT and the Municipal DLTCs that all licencing officials may be submitted to lifestyle audits from time to time.
19. With regard to driving schools, we recommend that GDRT consider that:
- 19.1 Driving schools be required to be registered with GDRT and/or DRT and that they be issued with registration certificates that should be renewed annually. When an applicant wishes to make use of a driving school's vehicle for their test, the driving school should be required to present proof that they are registered and in good standing with GDRT/DRT before the applicant is allowed to make use of the vehicle; and
- 19.2 A portal of registered driving schools in good standing, accessible to the public, should be maintained.
20. Based on the findings of the lifestyle audit performed where it was found that the assets and expenses of the officials were not commensurate with their salaries, we recommend that the GDRT consider referring these to law enforcement authorities for further investigation.
21. Based on our findings that the 13 officials identified during our lifestyle audit exercise were not able to provide any evidence of them having disclosed their other remunerative work to their employers, we recommend that GDRT request the management of the various municipal DLTCs to initiate disciplinary proceedings against these officials for their failure to disclose their other remunerative income, as is required by the Public Service Act, 30 of 2007, and the Public Service Regulations, 2016.
22. Regarding non-compliance to the MEC's Circular, we recommend that GDRT engages with the management of the following DLTCs that did not adhere to the

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requirements of the Circular, and following such engagement, decide on corrective action to be taken:

- 22.1 Temba;
 - 22.2 Kagiso;
 - 22.3 Mabopane;
 - 22.4 Xavier;
 - 22.5 Alberton;
 - 22.6 Boksburg;
 - 22.7 Edenvale;
 - 22.8 Fochville;
 - 22.9 Germiston;
 - 22.10 Krugersdorp;
 - 22.11 Bronkhorstspuit;
 - 22.12 Langlaagte;
 - 22.13 Midrand;
 - 22.14 Randfontein and
 - 22.15 Westonaria.
23. We recommend that GDRT consider equipping each DLTC with working CCTV cameras inside and outside the DLTCs, as well as in the yard where the tests are conducted.
24. Regarding the expired SLAs between GDRT and several Municipalities, we recommend that these GDRT ensure the SLAs be renewed and should include clear consequence management relating to allegations of fraud and corruption.

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25. Regarding the list of other matters identified throughout our investigation as discussed above in the report, we recommend that GDRT consider following up on these matters. These matters relate to:
- 25.1 Potential corruption taking place at MVRAs;
 - 25.2 Maintenance of the licencing centres; and
 - 25.3 Issues relating to non-operational VTS throughout Gauteng.