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PROVINCIAL GOVERNMENT
REPUBLIC OF SOUTH AFRICA

OFFICE OF
THE PREMIER

ANTI CORRUPTION POLICY

Document Approval Page

ANTI CORRUPTION POLICY

	Person	Signature	Date
Director General	Mr. N.S Nchabeleng		19/6/2018
Deputy Director General Administration	Ms. N.I Manamela		14/06/2018
Chief Director: EMSS	Mr. R.W Segooa		12/06/2018
Director:	Mr. FP. Masakona		12/06/2018
Deputy Director	Mr. AE Mudau		12/06/2018

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1. STATEMENT OF ATTITUDE TO CORRUPTION

The OTP requires all employees at all times to act honestly and with integrity and to safeguard resources for which they are responsible. The Office is committed to protect all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits.

Any corruption committed against the OTP is a major concern to the Executing and Accounting Authority. Consequently, any case shall be thoroughly investigated by the delegated SBU and appropriate corrective action shall be taken against anyone who is found guilty of corrupt conduct. This may include referral to the South Africa Police Services.

2. ACRONYMS AND ABBREVIATIONS

The following acronyms and abbreviations are used in this Policy:-

OTP	Office of the Premier
SBU	Strategic Business Unit
SAPS	South African Police Service
PDA	Protected Disclosures Act

3. INTRODUCTION

This policy is established to facilitate the development of controls which shall assist in the prevention and detection of fraud and corruption, as well as provide guidelines as to how to respond should instances of fraud and corruption be identified.

As a first step towards implementing an anti-corruption policy, that the Office of the Premier shall adopt and publish an Anti-Fraud Policy statement along the following lines:
The Office of the Premier recognises the likelihood of corruption in its operations; as such it is the policy and mission of Office of the Premier to strive for the protection of its employees and its other stakeholders through the implementation of an effective and efficient Anti-corruption Policy.

The Office of the Premier requires all employees to always act honestly and with integrity and to safeguard the resources for which they are either directly or indirectly responsible.

4. PURPOSE AND OBJECTIVES OF THE POLICY

The main purpose upon which the policy is based on the following:

- Creating a culture within the Office which is intolerant to unethical conduct, fraud and corruption;
- Strengthening broader participation in the fight against corruption in the Office;
- Strengthening relationships with key stakeholders, e.g. The Public Service Commission, Auditor General, SAPS, State Security Agency Employee Representative Unions and Communities, in the fight against corruption in the OTP;
- Deterrence of unethical conduct, fraud and corruption;
- Preventing unethical conduct, fraud and corruption which cannot be deterred;
- Detection of unethical conduct, fraud and corruption;

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- Investigating detected unethical conduct, fraud and corruption;
- Ensuring that appropriate action is taken in the event of such irregularities, e.g. disciplinary action, recovery of losses, prosecution, etc; and
- Ensure applying of sanctions, which include redress in respect of financial losses. The primary objective of this policy is to prevent fraudulent conduct before it occurs by encouraging a culture within the Office of the Premier where all employees, members of the public and other stakeholders continuously behave and promote integrity in their dealings with, or on behalf of the Office of the Premier.

To encourage all employees and other stakeholders to strive towards the promotion of integrity and the prevention and detection of unethical conduct, fraud and corruption impacting or having the potential to impact in the Office.

To improve accountability, efficiency and effective administration within the OTP, decision-making and management conduct which promotes integrity.

5. AUTHORITY OF POLICY

This policy is issued under the authority of the Premier as the Executing Authority and the Director General as the Accounting Officer for the Office of the Premier Limpopo Province.

6. LEGAL FRAMEWORK

This policy is guided by the following legal prescripts:

6.1 Public Sector Risk Management Framework

The Framework aims to ensure that public sector institutions share a common approach to risk management whilst providing sufficient scope institutions to adapt certain aspects to suit their institutional requirements

6.2 Provincial Risk Management Framework

The Framework aims to ensure that public sector institutions share a common approach to risk management whilst providing sufficient scope institutions to adapt certain aspects to suit their institutional requirements.

6.3 Prevention & Combating of Corruption Activities Act

The Act aims to prevent and fight corruption in government and in private sector. It was written to strengthen measures on prevention and combating corruption and corrupt activities.

6.4 The Public Service Anti-Corruption Strategy

The strategy is aimed at fighting corruption in a holistic and preventative manner. The strategy emphasises a need to implement nine strategic considerations illustrated on the strategy.

6.5 The Promotion of Access to Information Act (No. 2 of 2000)

This Act gives effect to Section 32 of the Constitution (Access to Information) by setting out how anyone can get access to information held by the state. By so doing, it promotes transparency and prevents government from operating in secret.

6.6 The Promotion of Administrative Justice Act (No. 3 of 2000)

This Act gives effect to Section 33 of the Constitution (Just Administrative Action). It ensures that decisions that affect the public are taken in a way that is procedurally fair and it gives people the right to request written reasons for decisions they disagree with. In this way, it creates greater transparency - people may be less tempted to act corruptly if they know they shall have to explain themselves to the public.

6.7 The Protected Disclosures Act (PDA) (No. 26 of 2000)

The PDA (often called the 'Whistleblowers Act) was passed to encourage employees to disclose information about unlawful and irregular behavior in the workplace. It offers protection from victimization for 'whistleblowers', as long as they meet the requirements and follow the procedure set out in the Act. This act was under revision at the time of the compilation of this booklet (January 2006).

6.8 The Public Finance Management Act (PFMA) (No. 1 of 1999)

These Act set out the requirements for dealing with public finances in government organs.

6.9 The Financial Intelligence Centre Act (FICA) (No. 38 of 2001)

This Act creates the Financial Intelligence Centre and was designed to combat money laundering.

7. SCOPE OF APPLICATION

This policy, except otherwise indicated, is applicable to all employees of and all stakeholders related to the Office of the Premier.

8. DEFINITIONS

8.1 Corruption

8.1.1 The general offence of corruption is contained in Section 3 of The Prevention and Combating of Corrupt Activities Act. This section provides that any person who gives or accepts or agrees or offers to accept / receive any gratification from another person in order to influence such other person in a manner that amounts to:

- The illegal or unauthorised performance of such other person's powers, duties or

functions;

- An abuse of authority, a breach of trust, or the violation of a legal duty or a set of rules;
- The achievement of an unjustified result; or
- Any other unauthorised or improper inducement to do or not to do anything is guilty of the offence of Corruption.

8.1.2 Corruption in its wider meaning, and as referred to in this document, includes any conduct or behaviour where a person accepts, agrees or offers any gratification for him/her or for another person where the purpose is to act dishonestly or illegally. Such behaviour also includes the misuse of material or information, abuse of a position of authority or a breach of trust or violation of duty.

8.2 Forms of corruption (Definitions)

Corruption takes various forms in the workplace and within the society. The following are examples of different types of corruption:

8.3 Bribery

Bribery involves the promise, offering or giving of a benefit that improperly affects the actions or decisions of employees.

8.4 Embezzlement

This involves theft of financial resources by persons who control such resources.

8.5 Fraud

In South Africa, the Common Law offence of fraud is defined as “the unlawful and intentional making of a misrepresentation which causes actual and or potential prejudice to another”. The term “fraud” is also used in a wider sense by the general public.

In this regard, the term is used in this document in its widest possible meaning and is intended to include all aspects of economic crime and acts of dishonesty. In other words, fraud can be described as any conduct or behaviour of which a dishonest representation and/or appropriation forms an element.

8.6 Extortion

Coercion of a person or entity to provide a benefit to an employee or another person/entity, in exchange for acting (or failing to act) in a particular manner.

8.7 Abuse of power

The use by an employee of his or her vested authority to improperly benefit another person or entity (or using vested authority to improperly to discriminate against another person or entity)

8.8 Conflict of interest

The failure by employees to act or to consciously fail to act on a matter where the employees have an interest or another person or entity that has some form of relationship with employees has an interest.

8.9 Abuse of privileged information

This involves the use, by employees of privileged information and knowledge that an employee possesses as a result of his/ her office to provide unfair advantage to another person or entity to obtain a benefit.

8.10 Favouritism

The provision of services or resources according to the personal affiliation or relationship by an employee.

8.11 Nepotism

An official ensuring that family members are appointed to a positions or that family members receive contracts from the department where the other family member is working is regarded as nepotism.

These manifestations are by no means exhaustive, as corruption appears in many forms and it is virtually impossible to list all of these.

9 POLICY PRONOUNCEMENTS

9.1 CORRUPTION CONTROL STRATEGY

The approach in controlling fraud and corruption shall be focused into 3 areas, namely:

- 9.1.1 Structural Strategies;
- 9.1.2 Operational Strategies; and
- 9.1.3 Maintenance Strategies.

9.1.1 STRUCTURAL STRATEGIES

Structural Strategies represent the actions to be undertaken in order to address corruption at the structural level. The following section outlines the corruption responsibilities associated with different roles within the Office of the Premier.

9.1.1.1 Accounting Officer

The Accounting Officer bears the ultimate responsibility for corruption risk management within the Office of the Premier. This includes the coordination of risk assessments, overseeing the investigation of suspected corruption, and facilitation for the reporting of such instances.

9.1.1.2 Risk Management Committee

The Office of the Premier's Risk Management Committee shall oversee the Office's approach to corruption prevention, fraud detection strategies and response to corruption

incidents reported by employees or other external parties and meet at least once a quarter as per the Risk Management Committee Charter to discuss the progress made in respect of implementing the Anti-Corruption Strategies.

9.1.1.3 An ethical culture

The Office shall conduct itself in an ethical and moral way as described in Public Services code of conduct and the set of principles referred to as values or norms of the Office of the Premier.

9.1.1.4 Executive Management commitment.

The Executive Management shall be committed to eradicating corruption and ensuring that the Office strives to be perceived as ethical in all its dealings with the public and other interested parties. In this regard, The Executive Management, under the guidance of the Accounting Officer, shall ensure that it does not become complacent in dealing with corruption and that it shall ensure the Institution's overall anti-corruption plan is reviewed and updated regularly. Furthermore, The Executive Management shall ensure that all employees and stakeholders are made aware of its overall anti-corruption strategies through various initiatives of awareness and training.

9.1.1.5 Assessment of fraud and corruption risk.

- a) The Office shall conduct annual fraud and corruption risk assessments to identify potential fraud and corruption risk exposures to the institution. This process shall ensure that actions to address the identified fraud and corruption risk exposures shall be implemented to mitigate these exposures.
- b) The above shall be formulated into "Fraud Risk Assessment" and which shall provide an indication of how fraud and corruption risks are manifested and, a "Fraud and Corruption Risk Register" which shall prioritise the fraud and corruption risks and indicate actions to mitigate these risks.

The fraud and corruption risk assessment shall be done as per the process as set out in the Risk Management Procedure Manual.

9.1.1.6 Employee awareness

All employees within the Office of the Premier shall receive training on the following:

- ✓ Anti-Fraud and Corruption strategy;
- ✓ Code of Conduct of the Public Service;
- ✓ Protected Disclosure Policy;
- ✓ How to respond to fraud and corruption; and
- ✓ Manifestations of fraud and corruption in the workplace.

9.1.2 OPERATIONAL STRATEGIES

The following are the operational structures to support Anti-Corruption measures in OtP:

9.1.2.1 Internal controls

- a) Internal controls shall be the first line of defence against corruption. While internal controls may not fully protect the Office of the Premier against fraud and corruption, they are essential elements in the overall Anti-Corruption Policy.
- b) The following are the identified areas within the Office of the Premier that require internal controls:-
 - ✓ Physical control (security of assets)
 - ✓ Authorization controls (Approval of expenditure)
 - ✓ Supervisory controls (supervising day-to-day issues);
 - ✓ Analysis of data;
 - ✓ Monthly and annual financial statements;
 - ✓ Reconciliation of bank statements, monthly; and
 - ✓ Reconciliation of vote accounts, monthly.
 - ✓ Procurement process
 - ✓ Segregation of duties (it reduces the risk of intentional manipulating or error and increase the element of checking.
- c) The Internal Audit shall be responsible for implementing an internal audit program which shall incorporate steps to evaluate adherence to internal controls.

9.1.2.2 Prevention strategies

The Office shall employ a number of combined initiatives result in an overall preventative environment in respect of fraud and corruption. ***These include (amongst others) the following:***

- a) Employee awareness

Employee awareness of the Anti-Corruption Policy, Code of Conduct, Protected Disclosure and the manifestation of fraud and corruption in the workplace shall assist in the creation of an environment which may be considered to be hostile to a would-be transgressor.
- b) Pre-employment screening

Pre-employment screening shall be carried out by Risk management Unit for all appointments of employees and service providers, and evidence of such screening shall be maintained by the Human Resources Management and Supply Chain Management respectively. Consideration should be given to the following pre-employment screening:

 - ✓ Verification of citizenship.
 - ✓ Police criminal history.
 - ✓ Reference checks with the two most recent employers.
 - ✓ Confirmation of Drivers Licence if required
 - ✓ Verification of formal qualifications claimed.
 - ✓ Directorship in any business entity
 - ✓ Verification of Fraudsters Database
- c) Recruitment process

Recruitment shall be conducted in accordance with the human resources policy. It shall be a transparent process and all appointments shall be confirmed only after due recommendation. Any person, involved in any decision-making process, who may have a conflict of interest during the process of appointment, must declare such a conflict in writing to the HRM immediately when noticing the interest to a particular candidate.

d) Internal Audit

The Internal Audit Annual Plan shall be based on the results of risk assessment report which shall prioritise high corruption risk areas. As part of the prevention strategy, internal audit shall examine and evaluate the adequacy and effectiveness of the system of internal control according to the plan, commensurate with the extent of the potential exposure/risk in the various segments of the Office of the Premier.

e) Disclosure of interest

All employees are required to disclose their business interests on an annual basis. The HRM shall develop the disclosure register that shall record all interest disclosed by the employees.

9.1.2.3 Detection strategies

a) Detection of fraud and corruption may occur through:

- ✓ Vigilance on the part of employees, including line management;
- ✓ The Internal Audit function;
- ✓ Ad hoc management reviews;
- ✓ Anonymous reports; and
- ✓ The application of detection techniques
- ✓ Risk Assessments

b) External Audit

The Office recognises that the external audit function is an important control in the detection of corruption. The interactions with all engaged external auditors to ensure that due consideration is given in respect of Fraud within the institution is vital.

The auditor role in detecting corruption (fraud) is in those fraudulent activities that have the potential of causing material misstatements in the financial statements. Therefore in case of independent auditor's audit engagement, the following two acts are considered as per Auditing International Standards ISA 240 (*The Auditors' Responsibility to Consider Fraud in the Audit of a Financial Statement*).

- ✓ Misstatements in the financial statements arising out of fraudulent reporting
- ✓ Misstatements in the financial statements arising out of misappropriation of assets

9.1.2.4 Response strategy

a) Reporting fraud and corruption – the Protected Disclosure Policy (Whistle Blowing)

One of the key obstacles to fighting corruption is the fear by employees of being intimidated

to identify or “blow the whistle” on fraudulent, corrupt or unethical practices witnessed in the work place. Those who often do “blow the whistle” end up being victimised and intimidated. For this reason, the Office has approved a Whistle Blowing Policy setting out the detailed procedure which must be followed in order to report any incidents of fraud and / or corruption. This policy was designed to comply with the provisions of the Protected Disclosures Act.

Any suspicion of fraud and corruption shall be treated seriously and shall be reviewed, analysed, and if warranted, investigated. If an employee becomes aware of a suspected fraud, corruption or any irregularity or unethical behaviour, such issues should be reported in terms of a Whistle Blowing Policy.

b) Investigating fraud and corruption.

Dealing with suspected fraud and corruption

In the event that corruption is detected or suspected, investigations shall be initiated, and if warranted, disciplinary proceedings, prosecution or action aimed at the recovery of losses shall be initiated.

c) Investigations

- i. Any reports of incidents of fraud and / or corruption shall be confirmed by an independent investigation. Anonymous reports may warrant a preliminary investigation before any decision to implement an independent investigation is taken.
- ii. Investigations shall be undertaken by the Risk Management Strategies or any investigative organ of state appointed by the Accounting Officer.
- iii. Any investigation initiated shall be concluded by the issue of a report by Risk Management Strategies or state organ such as Hawks or Special Infestation Unit. Such reports shall only be disseminated to those persons required to have access thereto in order to implement action is deemed appropriate as a result of the investigation.
- iv. Investigations may involve one or more of the following activities:
 - ✓ Interviewing of relevant witnesses, internal and external, including obtaining statements where appropriate;
 - ✓ Reviewing and collating documentary evidence;
 - ✓ Forensic examination of computer systems;
 - ✓ Examination of telephone records;
 - ✓ Enquiries from banks and other financial institutions (subject to the granting of appropriate approval/Court orders);
 - ✓ Enquiries with other third parties;
 - ✓ Data search and seizure;
 - ✓ Expert witness and specialist testimony;
 - ✓ Tracing funds / assets / goods;
 - ✓ Liaison with the police or other law enforcement or regulatory agencies;
 - ✓ Interviewing persons suspected of involvement in fraud and corruption; and
 - ✓ Report preparation.

d) Disciplinary proceedings

All disciplinary proceedings shall take place in accordance with the procedures as set out in the disciplinary procedures.

e) Recovery action

Where there is clear evidence of corruption and there has been a financial loss to the Office, recovery action, criminal, civil or administrative, shall be instituted to recover any such losses.

In respect of civil recoveries, costs involved shall be determined to ensure that the cost of recovery is financially beneficial.

f) Internal control review after discovery of fraud

i. In each instance where fraud is detected, Line Management shall reassess the adequacy of the current internal control environment (particularly those controls directly impacting on the fraud incident) to consider the need for improvements.

ii. The responsibility for ensuring that the internal control environment is re-assessed and for ensuring that the recommendations arising out of this assessment are implemented shall lie with Line Management of the business unit concerned.

9.1.3 MAINTENANCE STRATEGIES

9.1.3.1 Review of the effectiveness of the Anti-Corruption Policy.

The Office shall rely on the Internal Audit regarding review of the Anti-corruption plan annually to determine the effectiveness thereof. The Accounting Officer is ultimately accountable for this review and shall delegate such responsibility to a delegated business unit such as Risk Management Strategies to execute this responsibility.

9.1.3.2 Review and updating the Anti-Fraud and Corruption strategy.

Risk Management Strategies is key on making sure that this policy is reviewed when need arises.

9.1.3.3 Handling a fraud allegation

Risk Management Strategies is responsible for handling all allegation of corruption reported and appropriate action via the Accounting Officer should be taken to attend to such an allegation

9.1.3.4 Other matters

In each instance where fraud is detected, the Office shall reassess the adequacy of the internal control environment (particularly those controls directly impacting on the fraud incident) and consider the need for improvements. Where improvements are required, they should be implemented as soon as practicable.

9.1.3.5 Reporting fraud to police and / or external parties

- a) The Accounting Officer is responsible for reporting to the police, in circumstances in which there is evidence of corruption against:

- i. An employee/volunteer of the Office
- ii. A client of the Office;
- iii. A stakeholder or
- iv. A supplier to the Office.

- b) Reporting corruption to the police for investigation shall be subject to the requirements as set out in all applicable acts.
- c) Any decision not to refer an allegation of corruption to the police for investigation (where there is sufficient evidence to justify making such a report) shall be referred to the Executing Authority, together with the reasons for the decision.
- d) Responsibility for complainant statements lodged with Police shall be assigned on a case by case basis by the Accounting Officer in consultation with the investigator.

9.1.3.6 Recovery and other remedies

- a) The Office shall actively pursue the recovery of any money or property lost through fraud, provided there is a strong prospect of a net benefit to the Institution from such action.
- b) Where it is considered appropriate that the matter not be reported to the police, the Institution reserves its right to pursue a range of other remedies including appropriate disciplinary action. Any disciplinary action pursued shall be done in accordance with the disciplinary procedures.
- c) Exit interviews and exit checklist procedures shall be performed in the event of dismissal from the employee for misconduct or corruption. This is necessary to ensure that factors contributing to misconduct and fraudulent activity by employees can be managed as a process to mitigate fraud risk.

9.2 FRAUD AND CORRUPTION RISK ASSESSMENT

Fraud and corruption risk assessment shall be conducted in four identified focus area. Those focuses are:

- a) Human Recourses employment practices.
- b) Supply Chain process
- c) Service Delivery
- d) Financial Systems and Controls.

The outcome of the Fraud and Corruption Risk Assessment shall consist of the following:

- ✓ Components of risk under each focus area as well as manifestations (materialization) of frauds/corruption of each component; and
- ✓ The corruption risk register containing all the risk manifestations and the recommendation to address each manifestation

10 DEFAULT

Any employee who contravenes the provisions of this policy which may lead to violations of the Public Service Code of Conduct or any rules or policies, that employee shall be charged with misconduct and the necessary disciplinary measures will be taken against him or her.

11 INCEPTION DATE

The inception date for this policy will be within 30 days after the approval by the Accounting Officer and it supersedes and replaces the 2015 version

12 TERMINATION AND REVIEW CONDITIONS

This policy will be reviewed by the Office of the Premier's SPPC directorate at least every 24 months based on the comments and inputs from the stakeholders. The amendments resulting from the review will be processed in line with paragraph **Error! Reference source not found.** of this policy.

This policy will remain in force until and unless it has been withdrawn and amended by Executing Authority.

13 ENQUIRIES

Enquiries regarding this policy should, in the first instance, be directed to the Directorate Risk Management Strategies.

IMPLEMENTATION PLAN OF THE PUBLIC SERVICE ANTI-CORRUPTION STRATEGY (PSACS) AND RESOLUTIONS OF THE 3rd NATIONAL ANTI-CORRUPTION SUMMIT

OFFICE OF THE PREMIER 2018//2019

A. Public Service Anti-Corruption Strategy Implementation Plan

No	Objectives (as per PSACS)	Activity	Performance Indicators/ Measures	Responsibility	Timeframe
1.	Review & consolidation of the legislative framework	Review Anti-Corruption Strategy	Approval of the Amended Departmental anti-corruption and its implementation plan	Director : Manager: Risk Management Strategies	31 July 2018
2.	Increased institutional capacity	Establish Minimum anti corruption capacity	All vacant posts for dealing with Anti-Corruption work are filled	Human Resources Management	31 March 2018
3.	Improved access to report wrongdoing and protection of whistleblowers	Promote culture of whistle blowing amongst employees	Employees reported cases of malpractices	Director : Risk Management Unit	31 March 2019
4.	Prohibition of corrupt individuals and businesses	Promote integrity & ethics within the public service and businesses	Departmental electronic register for corrupt business & individuals is developed and utilised	Director : Supply Chain Management Unit	31 March 2019
5.	Awareness, Training and education	Conduct organisational Awareness & education on anti corruption.	Awareness & education programme is developed & implemented	Director : Risk management Unit	31 March 2019
6.	Improved management policies and Practices	Promote accountability for preventing corruption	Fraud risk Assessment is conducted annually and approved	Deputy Director :Integrity	31 March 2018

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No	Objectives (as per PSACS)	Activity	Performance Indicators/ Measures	Responsibility	Timeframe
7.	Managing professional ethics	Enhance Professionalism and confidence in the public sector	Code of conduct of the Public Sector is complied with.	Director: HRM	31 March 2019
8.	Partnership with stakeholders	Strengthen corruption preventative and combating measures	Participation in Provincial and National Anti-Corruption initiatives	Director: Risk Management Strategies Unit	31 March 2019
9.	Social Analysis, Research and Policy advocacy.	Conduct social analysis and research on the trends and causes of corruption	Departmental Corruption trends is reported quarterly	Director : Risk Management Strategies	31 March 2019
B.	Implementation plan on the 3 rd Anti corruption Summit Resolutions				
10.	To develop systems of disclosure of interests for employees.	Establish effective systems of disclosure of business interest for employees.	Disclosure forms are issued collected, analysed and submitted	Director : HRM	31 March 2019
11.	To investigate allegations of corruption without fear or favour, in accordance with past and present anti-corruption legislation	Investigated all cases reported are	All cases reported are investigated within 40 Days	Director : Risk Management Strategies	31 March 2019
12.	To promote the National Anti-Corruption Hotline and	Ensure that allegations of corruption in the workplace	Allegations of corruption reported are investigated	Director : Risk Management	31 March 2019

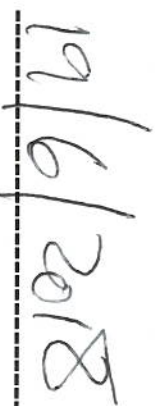




No	Objectives (as per PSACS)	Activity	Performance Indicators/ Measures	Responsibility	Timeframe
13.	To train public officials in all spheres of government in ethics, conflict of interest principles, constitutional and administrative law and the principles of <i>Batho Pele</i>	Conduct training on ethics, principles of conflict of interest and etc for employees in the Office of the Premier.	within 40 Days via the NACH and capacity to deal with corruption improved. Training Programme is Developed	Director : Risk Management and HRD	31 July 2018



Director General



Date

