

THE
ETHICS
INSTITUTE

Local Government Ethics Committee Guidebook

Fatima Rawat and Kris Dobie

Project funded by:



Guidebook developed in partnership with:



Dedication

This guidebook is dedicated to

Municipal councillors and officials who champion the cause of ethics in their local government as well as all the stakeholders who support municipalities in their ethics journey.

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Local Government Ethics Committee Guidebook

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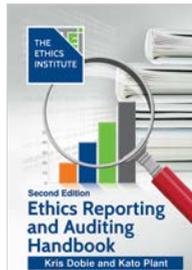
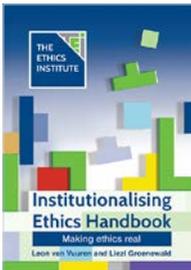
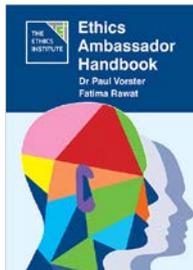
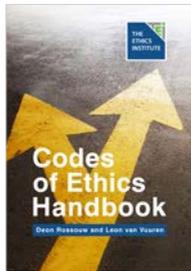
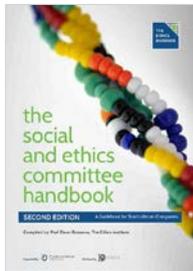
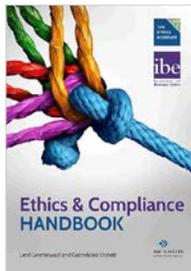
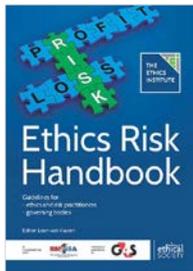
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The development and production of this guidebook was made possible courtesy of the Canadian Fund for Local Initiatives (CFLI)

We have had the fortune of working in partnership with national, provincial and local government to support municipalities on their ethics journeys. In our engagements and discussions across the spheres it was evident that even though the Local Government Anti-Corruption Strategy had been published in 2015, municipalities were not yet at the stage of implementing the Strategy.

One of the key foundational areas which municipalities wanted to engage on first was the ethics/integrity governance and management structures which they would have to set up, and how to go about doing that. We were keen to produce a resource which would assist municipalities to establish their ethics governance and management structures.

We would like to express our sincere appreciation to the Canadian Fund for Local Initiatives (CFLI) for the funding to produce this guidebook. Our thanks also to our partners across the spheres of government who generously gave of their time to share their insights and contribute to the thinking which informed this resource. We are privileged to have the opportunity to share our collective learnings through this guidebook.

Our gratitude to Professor Deon Rossouw for guiding us and helping us structure the content into a resource which will hopefully make a meaningful contribution to local government.

To councillors and officials who champion ethics/integrity and anti-corruption efforts in municipalities and to the national and provincial officials who support municipalities on this journey, we hope that this guidebook will be a useful resource as you collectively work towards building and shaping a professional ethical culture in local government,

Best wishes,

Fatima Rawat and Kris Dobie

February 2022

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Local government is the most immediate interface between citizens and government. The interaction between municipalities and the communities that they serve thus have a direct bearing on the quality of life of people.

People will only trust local government if they experience their councillors and local municipal officials as both competent and ethical. Since the dawn of democratic government, various initiatives have been taken to ensure that both competence and integrity prevails in municipalities.

This guidebook was written with the intent of enhancing the effectiveness of the ethics management processes and structures in local government that were created through various pieces of legislation and regulation. More specifically, this guidebook wishes to address a key aspect of ethics management in local government around which there is ambiguity and a lack of clarity, viz. the role of governance and operational ethics committees in building an ethical culture in municipalities.

This need was identified by The Ethics Institute through the work that we have been doing in municipalities over the last decade. Specifically, my colleagues Fatima Rawat and Kris Dobie have immersed themselves in the challenges and opportunities of governing and managing ethics in local government. I would like to express my sincere gratitude, but also admiration for the sterling work that they are doing in this sphere of government.

We are delighted that the Canadian Government took an interest in the role of ethics committees in local government in South Africa, and that they were willing to fund the creation and production of the *Local Government Ethics Committees Guidebook* under the Canadian Fund for Local Initiatives.

We have always been most fortunate to enjoy the support of two key players in local government governance, viz. the Department of Cooperative Governance (DCoG) and the South African Local Government Association (SALGA). We are most thankful for their enthusiastic support in producing this guidebook.

I trust that the *Local Government Ethics Committees Guidebook* will become a trusted and resourceful companion for those tasked with the responsibility of governing and managing ethics in our municipalities. We trust that this resource will assist you in building an ethical culture that will enhance service delivery to the citizens of our country.

Prof. Deon Rossouw

CEO: The Ethics Institute

The 2015 Local Government Anti-Corruption Strategy (LGACS) and its accompanying Municipal Integrity Management Framework (MIMF) provide that municipalities should, as part of their endeavours to combat corruption and build ethical organisations, establish a council committee which exercises oversight over the municipality's integrity promotion and anti-corruption strategy. There is, however, limited guidance provided to municipalities as to how to go about establishing this committee. This guidebook seeks to address that gap by providing clarity to municipalities on how to go about establishing this *Council Ethics/Integrity Oversight Committee* and ensuring its functionality. It further clarifies how this committee interacts with other council committees that also have an ethics/integrity-related function.

Ethics, Integrity, and Anti-corruption

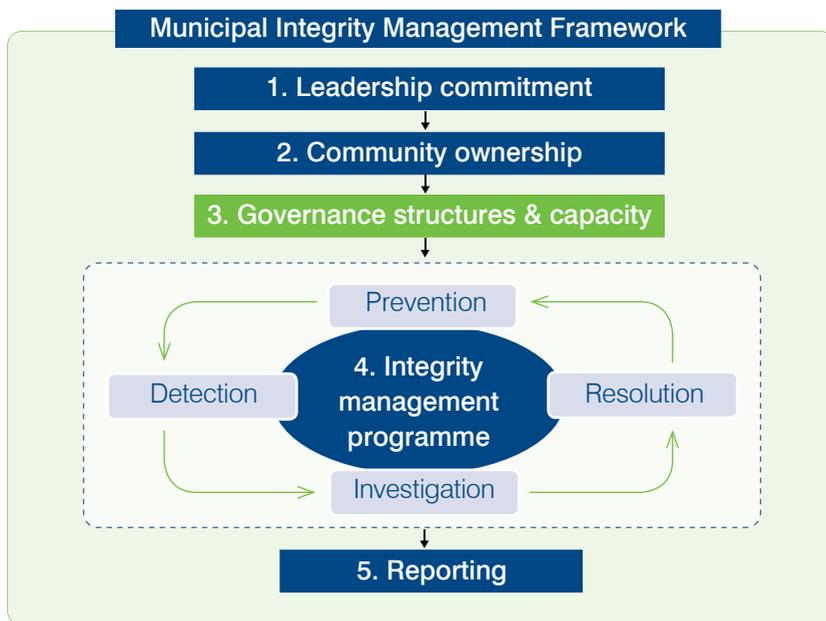
In this guidebook, we utilise the terms 'ethics' and 'integrity' combined and interchangeably. There is not a distinction between an ethics management programme or an integrity management programme. Both these concepts are strongly aligned with the pro-active elements of an anti-corruption programme. We, therefore, do not see that a municipality will have an ethics programme and a separate anti-corruption programme. These are one and the same, and both are contained in the MIMF

1.1. Context – The Municipal Integrity Management Framework

The 2015 Local Government Anti-Corruption Strategy (LGACS) introduced the concept of ethics/integrity management into the local government sphere. Prior to this, the concept of ethics management had already found expression in the 2013 Public Sector Integrity Management Framework (applicable to national and provincial government), and in the various King Reports on Corporate Governance.

The Municipal Integrity Management Framework (MIMF) forms part of the LGACS. It sets out the responsibilities of municipalities in implementing the LGACS.

It requires the following from municipalities:



Principles of the Municipal Integrity Management Framework (MIMF)

1. **Leadership commitment:** Municipal Leadership should set the tone and drive good governance, organisational integrity and anti-corruption initiatives.
2. **Community ownership:** Communities must be acknowledged as the owners of municipalities, and initiatives must be put in place to ensure transparent and accountable governance and community oversight.
3. **Governance structures and capacity:** Appropriate governance structures must be in place and should ensure effective governance, oversight, and the implementation of the integrity management framework. There should be sufficient capacity to implement the integrity management framework.

4. **Integrity Management Programme:** Municipalities should institutionalise integrity management initiatives based on the four pillars of prevention, detection, investigation, and resolution.
5. **Reporting:** Effective information management systems should be implemented, and municipalities must submit reports to appropriate entities to ensure transparency through monitoring, oversight, and accountability.

Municipal Integrity Management Framework, 2015

1.2. Focus of this guidebook

This guidebook will focus on unpacking the third element of this Framework, i.e. governance structures and capacity. It aims to:

- Unpack the concepts of the **governance** of a municipality's ethics/integrity programme *vs* the **management** of the programme.
- Explain which committees the municipality should have in place to govern its ethics/integrity, and how these should function.
- Explain the capacity that should be in place in the municipality for managing its ethics/integrity programme.
- Explain the reporting to and by the committees which govern ethics/integrity.

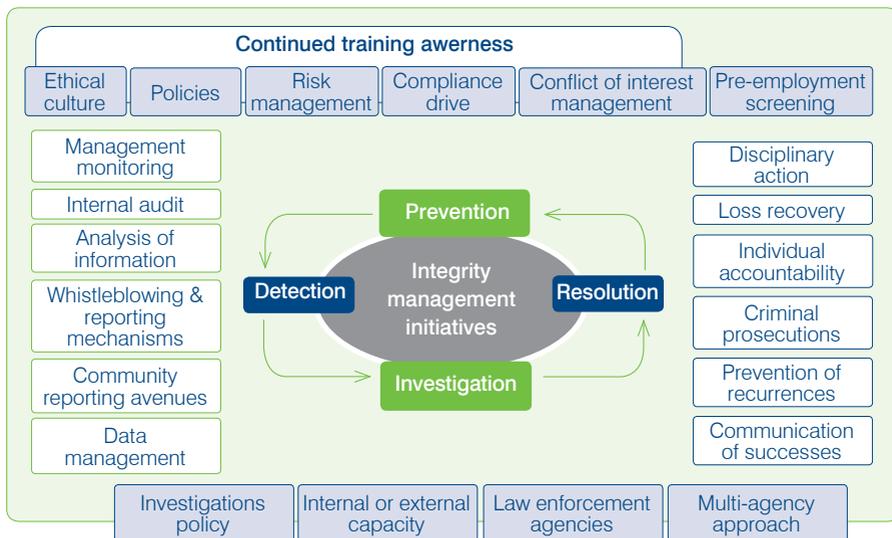
1.3. What is integrity management?

Before we elaborate on the relevant governance structures (committees) and capacity that should be in place, it is helpful to have a better understanding of what integrity management is.

The MIMF serves as a guideline for municipalities to manage ethics/integrity. It takes the approach that corruption will be much less likely to take root in an organisation that has a professional ethical culture.

As such, it consolidates requirements for municipalities to both promote ethics/integrity (proactive ethics interventions) as well as those to combat corruption (reactive ethics interventions) as part of their Integrity Management Programme.

The MIMF provides that municipalities should institutionalise integrity management initiatives based on the four pillars of prevention, detection, investigation, and resolution. The diagram below provides an overview of the four-pillar approach to integrity management, along with the associated activities as elaborated on in the MIMF.



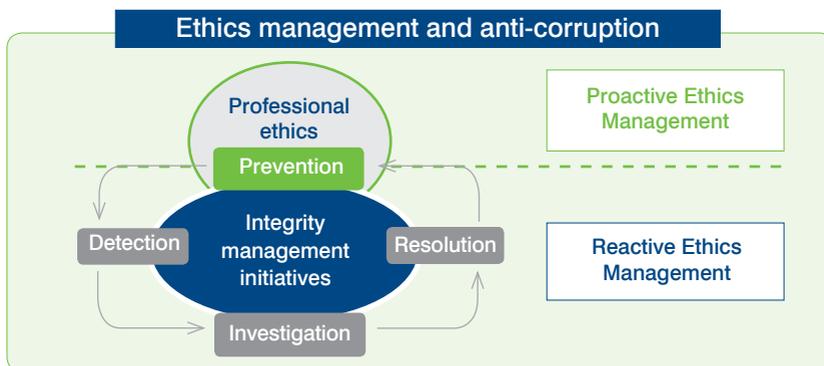
Schematic diagram of the integrity management initiatives

Pillar One, Prevention, is focussed on building the ethical culture of the municipality through continued training and awareness (proactive ethics management interventions). The ethics office is the primary custodian for managing the activities in this Pillar whilst drawing on other units in the municipality to assist.

Pillars Two, Three, and Four are focussed on the management of unethical behaviour once it has occurred and are therefore considered as reactive interventions. The responsibility for the implementation of these aspects might sit with different functions, ranging from Labour Relations, Risk, Finance, etc. The ethics office needs to work closely with other units or departments in the municipality to understand the emerging matters which are risks to the ethics/integrity of the municipality.

	Proactive interventions	Reactive interventions
Focus	Contributing to building an ethical culture.	Contribute to the management of unethical behaviour that has occurred.
Pillar	1. Prevention	2. Detection 3. Investigation 4. Resolution
Primary driver	Ethics office	Different functions as determined by the municipality.

The diagram below illustrates the critical link between the proactive and reactive interventions:



The focus of proactive ethics management is on building the professional ethical culture in the municipality underpinned by its stated values and expected ethical standards.

Proactive interventions include elements such as:

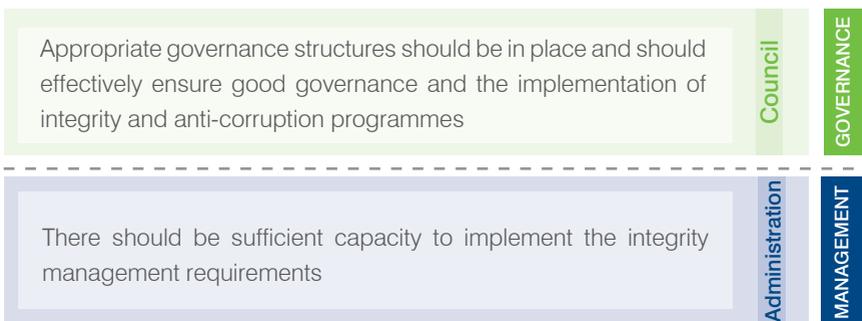
- training and awareness-raising efforts that promote ethical behaviour;
- ensuring that competent employees of skill and integrity are appointed; and
- putting systems in place to manage conflicts of interest (including gifts, financial disclosures, and external remunerative work).

In summary, proactive ethics management is about the municipality having a focussed plan in place to manage its ethics with a view to building a professional ethical culture. Currently, many municipalities set out their approach to combatting corruption in a separate anti-corruption strategy.

The MIMF, however, advocates that municipalities should develop Integrity Management Programmes which both proactively build the professional ethical culture whilst at the same time managing corruption through reactive ethics management initiatives. It therefore integrates the ethics programme with the anti-corruption programme.

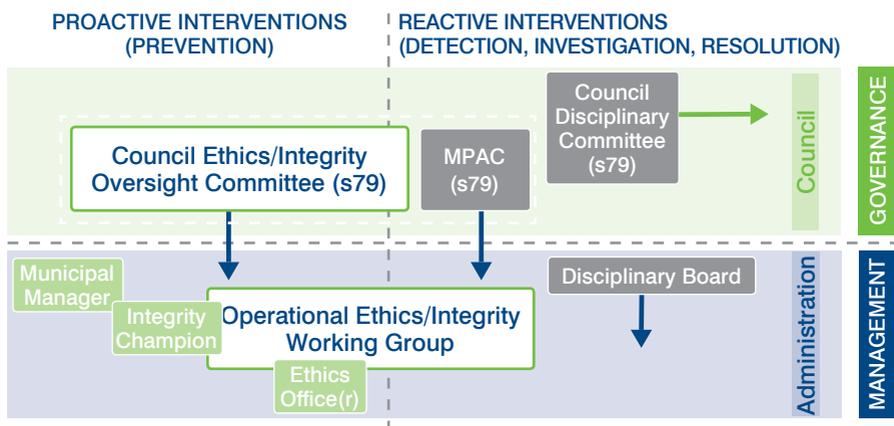
1.4. Governance of Integrity vs Management of Integrity

The third principle of the MIMF draws a very strong distinction between the oversight or governance of a municipality’s ethics/integrity initiative by Council and the management or implementation of a municipality’s ethics/integrity initiatives by the municipal administration as depicted below:



1.5. Overview of ethics/integrity governance structures and role-players

The following diagram indicates the various governance structures (committees) and role-players that will be discussed in this guidebook.



In Chapter Two, we will discuss the ethics governance structures focussing on the Council Ethics/Integrity Oversight Committee which should be in place to oversee the implementation of the MIMF in the municipality.

The Council Ethics/Integrity Oversight Committee should not be confused with these other council structures:

- A Council Disciplinary Committee can be established in terms of s79 of the Municipal Structures Act to assist the Speaker with maintaining the discipline of councillors. This is sometimes also referred to as a Council Rules and Ethics Committee.
- Council should establish a Disciplinary Board to provide oversight of allegations of financial misconduct and criminal proceedings among officials.
 - This is required by the MFMA: *Municipal Regulations on Financial Misconduct Procedures and Criminal Proceedings* (2014)

In Chapter Three we will focus on the ethics/integrity management structures and capacity which should be in place as per the MIMF, including the Integrity Champion, Ethics/Integrity Working Group, and the ethics office(r).

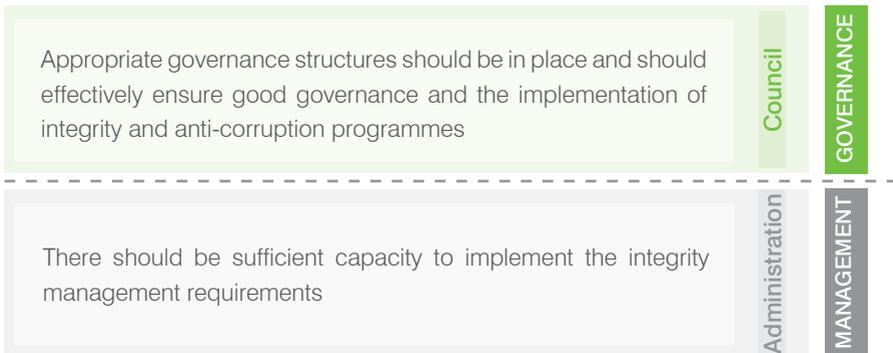
We will conclude with Chapter Four which will look at the reporting relationships between the ethics governance and ethics management structures.

1.6. Principle of differentiation

The MIMF is grounded in the principle of differentiation. This means that it encourages municipalities to implement the principles of the MIMF as best as it can within its own context and reality. Municipalities should not strive to build the *Rolls Royce* of ethics programmes if it simply does not have the resources to do so. They should rather broadly adhere to the principles of the MIMF to achieve an ‘overall net positive effect’ of a professional ethical culture. Readers are therefore encouraged not to take a compliance mindset, but rather to see how best the principles of the MIMF can be applied in their specific municipalities.

In this Chapter, we will unpack the first part of MIMF Principle Three which relates to municipalities having appropriate governance structures in place to ensure good governance and the implementation of the municipality's integrity and anti-corruption programmes.

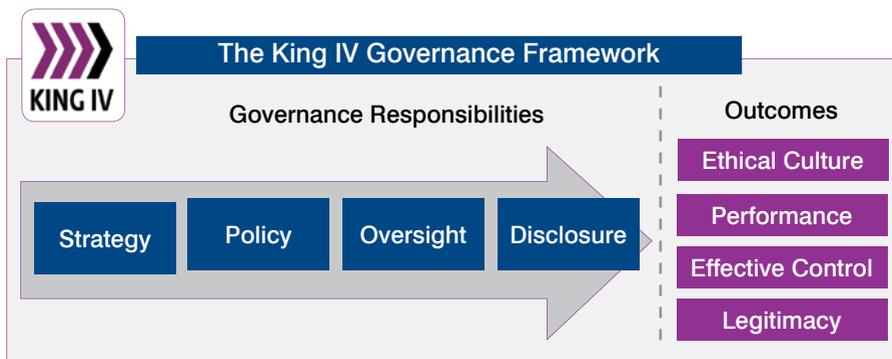
MIMF Principle Three: Governance structures and capacity



The role of municipal council is like that of a board or a governing body. According to the Municipal Supplement to King IV, the legislated role of Council as set out in the Constitution, Municipal Finance Management Act, Municipal Structures Act and Municipal Systems Act is to:

1. Set strategy;
2. Give effect to strategy by approving policy, including plans, frameworks, structures, and procedures;
3. Providing oversight over implementation (which includes holding role-players accountable); and
4. Demonstrating transparency through disclosure in the municipality's annual reports.

King IV places the responsibility on Councils to fulfil these governance roles to attain the governance outcomes of an ethical culture, good performance, effective control, and legitimacy. This is summarised in the diagram below.



*Schematic diagram of governance responsibilities and outcomes
(Source: King IV, 2016)*

King IV also sets out specific responsibilities for Council with regards to governing the ethics of the municipality, which aligns with the responsibilities set out in the MIMF:

Principle Two of King IV – Municipal Supplement

“Council should govern the ethics of the municipality in a way that supports the establishment of an ethical culture”

- King IV, 2016

Whilst Council is responsible for governance and oversight, it has the leeway – in terms of the Municipal Structures Act – to create council committees that can support it to exercise its oversight role.

Section 79 of the Municipal Structures Act provides that ‘a municipal council may establish one or more committees necessary for the effective and efficient performance of its functions or the exercise of any of its powers’.

Section 80 of the Municipal Structures Act provides that if a municipal council has an executive committee or executive mayor, it may appoint (in terms of s80) committees of councillors to assist the Executive Committee or Executive Mayor.

Section 79 committees have been found to be best suited for the council oversight functions, unlike section 80 committee which tend to be reserved for portfolio committees. The MIMF provides that municipalities should have the following committees in place:

MIMF Principle Three: Governance Structures and Capacity

1. Oversight committees

- a) Each municipality must establish an Audit Committee (in line with the MFMA s.166), which must be effective in fulfilling its mandate.
- b) Municipalities should also consider establishing the following committees (in line with section 79 of the Municipal Structures Act as amended):
 - Municipal Public Accounts Committee (MPAC)
 - Council Disciplinary Committee.

Note: The 2021 Amendments to the Municipal Structures Act now provide for the establishment of MPAC in terms of s79A (new provision).

2. Oversight of allegations and outcomes

- a) The municipal council must provide oversight of allegations and outcomes as set out in the MFMA: Municipal Regulations on Financial Misconduct Procedures and Criminal Proceedings (2014).

Note: The Regulation refers to this body as a Disciplinary Board.

3. Oversight of the anti-corruption/integrity management programme

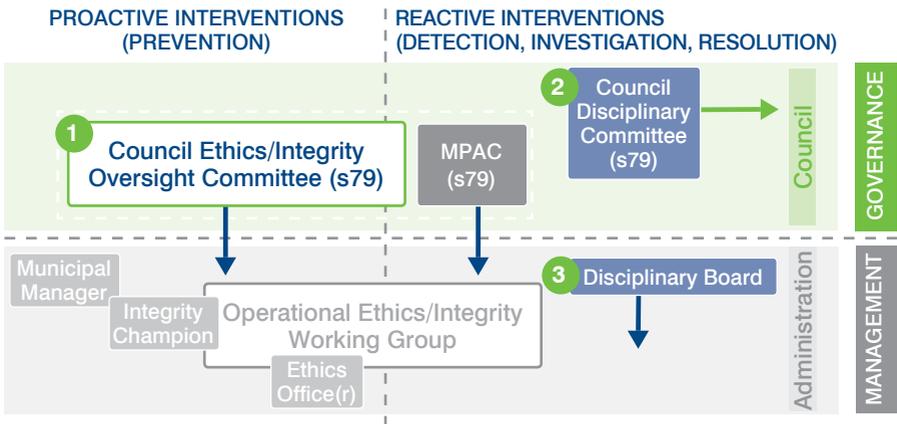
- a) A relevant committee (such as the Municipal Public Accounts Committee) should provide strategic guidance and oversee implementation of the municipality's integrity promotion and anti-corruption strategy.

Note: We refer to this as a Council Ethics/Integrity Oversight Committee.

Municipal Integrity Management Framework, 2015

Of these committees, the Audit Committee is considered a standard governance committee and will not be discussed in this document.

The other governance structures that are required by the MIMF are shown in the diagram below:



The main committee that we want to focus on is the Council Ethics/Integrity Oversight Committee. In most municipalities there is currently no structure that takes responsibility for oversight of the implementation of the MIMF.

We will, however, also discuss the Council Disciplinary Committee, the Disciplinary Board, and MPAC as there might be some confusion about the roles these committees play with respect to the oversight of ethics/integrity.

2.1. Council Ethics/Integrity Oversight Committee

The MIMF only gives the following guidance on establishing a Council Ethics/Integrity Oversight Committee.

3.3. Oversight of the anti-corruption / integrity management programme

- a) A relevant committee (such as the Municipal Public Accounts Committee) should provide strategic guidance and oversee implementation of the municipality's integrity promotion and anti-corruption strategy.
- b) The relevant committee should continuously monitor progress with the implementation of the strategy. Where there is lack of implementation there should be a response. This could include improved support and resources or holding non-performing officials accountable..

Municipal Integrity Management Framework, 2015

The MIMF does not prescribe which committee of council should take on this responsibility. The discretion is left with Council to either establish a new council committee to take on this oversight role, or to assign the role to an appropriate existing committee of council.

The MIMF does, however, suggest that the Municipal Public Accounts Committee (MPAC) could be an appropriate committee to take on this oversight role in addition to its existing mandate.

At the time at which the MIMF was drafted, MPAC was the council committee which performed an oversight function on behalf of council. MPAC was established in terms of section 79 of the Municipal Structures Act and was considered an independent, potentially well-capacitated committee which was key in combating corruption.

The 2021 amendments to the Municipal Structures Act provide for the establishment of MPACs in terms of s79A which reiterate the independence of MPACs and also provide that MPAC can attend to and make recommendations to the municipal council on any matter referred to it by the

municipal council, executive committee, a committee of the council, a member of this committee, a councillor, and the municipal manager – this leaves room for MPAC to be given the responsibility of oversight over ethics/integrity management.

The Western Cape provincial government has recommended to its municipalities that they include the responsibility to exercise oversight over ethics/integrity management in the mandate of MPACs. This has since been taken on board by many of the municipalities in the Western Cape and incorporated into the mandate and Terms of Reference of MPAC.

Source: focus group discussions with provincial officials supporting local government

2.1.1. Use an existing committee, or establish a new one?

Given the envisaged oversight role, the committee would be a s79 committee. Is it best to use an existing s79 committee or create a new s79 committee?

If there is an existing council committee whose role includes oversight over issues related to governance, it may be an option to use that (especially in smaller municipalities). If this option is chosen, the decision will need to be formally taken by Council, after which the Terms of Reference of that committee would need to be amended to include oversight of the integrity and anti-corruption programme.

When determining whether there is an existing committee which can take on this role, some considerations would include:



- Is there a synergy between the existing mandate of the committee and the oversight over the integrity management and anti-corruption programme?



- Will the committee have the time, resources, and capacity (considering its existing mandate and agenda items) to do justice to the matters that will need to be considered for it to meaningfully exercise oversight over the municipality's integrity and anti-corruption programme? This is a critical consideration and should weigh heavily in deciding whether/not to use an existing committee.



- Is the chairperson of the committee willing to take on the additional oversight role?

- What are the practical implications of taking on this additional oversight role in terms of time, money, and capacity?



- Do the current members of the committee have the skills, knowledge, and expertise to exercise oversight of the anti-corruption/integrity management programme?

The consideration of the above will assist Council in its deliberations of whether to use an existing council committee or not.

Establishing a new Council Committee

If there is not an appropriate council committee to take on this role, or if Council feels that it would be best to have a dedicated committee to focus on the oversight of its integrity and anti-corruption programme, then Council would need to take a decision around the establishment of a new council committee.

As outlined above, generally oversight committees tend to be established as s79 committees which report directly to Council and their Terms of Reference are determined by Council. It is recommended therefore that, should a municipality opt to create a new committee, it be done in terms of s79 of the Municipal Structures Act.

A key factor to consider when deciding whether or not to establish a new committee is the financial aspect. What can the municipality afford in terms of capacity? Is a new committee justified, or is it best to use an existing committee?

In larger municipalities that have 40+ councillors, the municipality must pay their s79 chairs a full-time councillor salary. In a small municipality, they may establish a s79 committee without having to pay a full-time salary.

Some other questions for consideration:



- How should the committee be composed? How many councillors should serve on the committee?

- How should the councillors who serve on the committee be selected?

- What capacity, level of skills, knowledge, and experience should be required of councillors?



- Should it be necessary, s79 committees may 'co-opt advisory members who are not members of council'. This means that external expertise can be brought in.



- What support will be required for the committee to fulfil its mandate? is there a need for a researcher, secretary assisting, etc.?

- How often will the committee meet?

2.1.2. Mandate

The establishment of this council committee is in line with Principle 2 of King IV – the idea being that there should be an appropriate governance committee whose role it is to exercise oversight over the municipality’s integrity promotion and anti-corruption programme. The committee should ensure that the ethics/integrity and anti-corruption efforts of the organisation is managed in a way that supports the establishment of a professional ethical culture.

In engagements with municipalities, there was a sense that the Council Ethics/ Integrity Oversight committee should also look at the ‘overall big picture’ of the municipality’s ethics. This would include whether the municipality and its people (both councillors and officials) are behaving ethically or not, the impact which the municipality has on its stakeholders and broader society, as well as risks to the municipality’s reputation and how best these can be managed.

According to the King IV, the role of the governing body when exercising oversight of ethics would be to:

- a) Determine whether there is an appropriate strategy for managing ethics in the organisation;
- b) Determine whether the organisation has developed a code of ethics and related policies and standards to guide employees and supply chain on what is ethically appropriate conduct;
- c) Exercise regular and proper oversight over the ethics performance of the organisation; and
- d) Ensure that the ethics performance of the organisation is reported and disclosed to stakeholders.

The MIMF outlines that this committee should:

- a) Provide strategic guidance and oversee the implementation of the municipality's integrity promotion and anti-corruption strategy.
- b) Continuously monitor progress with the implementation of the strategy.
- c) Where there is lack of implementation there should be a response. This could include improved support and resources or holding non-performing officials accountable.

Each of these aspects are unpacked in further detail below:

The first task for the committee is twofold, i.e.

- i. Provide strategic guidance; and
- ii. Oversee the implementation of the municipality's integrity promotion and anti-corruption strategy.

What is Strategic Guidance?

From King IV, we understand that a key role of governing bodies is to provide direction and strategy, and to then give effect to the strategy by approving policies (including plans, frameworks, etc.).

In addition to providing strategy, the governing body has a crucial role to play in guiding the organisation by giving advice, direction, and support to management – essentially guiding the organisation smoothly through the process of implementing the strategy, ensuring that the strategic values of the organisation are at the centre.

Strategic guidance refers to the role which the committee will play in guiding the implementation of the municipality’s integrity promotion and anti-corruption strategy. This aligns with the thinking in King IV which requires governing bodies to move beyond mere oversight to also providing strategic direction to the organisation.

Hence it is important that members of the committee understand the objective of the committee, its mandate and purpose, as well as the vision and mission of the LGACS, the MIMF, King IV, and applicable documents so that the committee can provide strategic guidance to management.

How does a committee oversee the implementation of the municipality’s integrity promotion and anti-corruption strategy?

What is Oversight?

The ISO Standard 37000 which focusses on the Governance of Organisations provides the following guidance.

Principle of Oversight

“The governing body should oversee the organization’s performance to ensure that it meets the governing body’s intentions for, and expectations of, the organization, its ethical behaviour and its compliance obligations.”

Rationale for Oversight

“Effective oversight by the governing body ensures the organizational purpose and strategic outcomes are achieved in the intended and required manner.

Oversight is important because the governing body needs to ensure that delegated responsibilities are performed as required and decisions are made within the delegated authority.”

ISO 37000:2021 Governance of organizations: Guidance

Checklist: Oversight over pro-active integrity promotion

TEI’s handbook series <https://www.tei.org.za/handbooks> contains practical and leading practice guidance and are extremely useful resources which will assist Ethics/Integrity Committee members. The Ethics Office Handbook as well as the Institutionalising Ethics Handbook, in particular, will assist Ethics/Integrity Committee members to better understand proactive ethics management.

As part of its oversight function, the Ethics/Integrity Oversight Committee should ensure that the following ethics/integrity management processes are effectively managed:

No.	Ethics/Integrity Process	Check
i.	Leadership commitment	
	<p>Commitment from leadership across all levels in the organisation for the municipality’s ethics journey is absolutely critical. This is emphasised in King IV, the LGACS, and the MIMF.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - How is leadership across all levels in the municipality demonstrating support for ethics? - Are there any instances in which leadership may be hampering the municipality’s ethics/integrity efforts? - Are there ways in which the committee can assist to un-block any challenges with leadership commitment for the ethics/integrity initiatives? 	

No.	Ethics/Integrity Process	Check
ii	<p>Are regular ethics risk and opportunity assessments conducted?</p>	
	<p>An ethics risk and opportunity assessment will provide the municipality with a sense of its ethics risks and opportunities. (For more information on Ethics Risk Assessment please refer to TEI's Ethics Risk Handbook as well as TEI's Institutionalising Ethics Handbook.)</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Has an ethics risk and opportunity assessment been conducted? - When was it conducted? - What were the findings of the assessment? - What actions were taken following the assessment? - Please provide the committee with copies of the ethics risk assessment reports? <p>If an ethics risk and opportunity assessment has not been conducted, the committee should guide the municipality to conduct an ethics risk and opportunity assessment. Once the ethics risk and opportunity assessment has been commissioned, the committee should provide guidance throughout the process.</p>	
iii.	<p>Has an ethics management strategy been developed? If so, is it being implemented?</p>	
	<p>An ethics strategy is developed after an ethics risk and opportunity assessment. It sets out the ethics strategy and vision for the organisation. It would be accompanied by an implementation plan that sets out the collective responsibility for the implementation of the strategy. The strategy would need to be approved by the Ethics/Integrity Oversight Committee.</p>	

No.	Ethics/Integrity Process	Check
	<p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Has an ethics management strategy been developed? If so, when was it developed? Please provide a copy of the approved ethics strategy? - Is there an approved implementation plan? Please provide a copy and advise as to progress with rolling out the implementation plan? 	
iv.	<p>Does the municipality have a Code of Ethics/Code of Conduct?</p>	
	<p>In the municipal environment the codes are pre-defined in legislation. The municipality can, however, develop a values-statement to support the codes of conduct.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Does the municipality have a values-statement to support the codes of conduct? - If so, how are the codes and the values statement being institutionalised in the municipality 	
v.	<p>Are relevant ethics policies developed?</p>	
	<p>King IV provides that the governing body should approve codes of conduct and ethics policies that articulate and give effect to its direction of organisational ethics.</p> <p>The following are considered core ethics policies:</p> <ul style="list-style-type: none"> - conflicts of interest; - gifts and hospitality; - anti-corruption; - protected disclosure/whistleblowing; - internal investigations; and - anti-sexual harassment and anti-bullying. 	

No.	Ethics/Integrity Process	Check
	<p>The following policies govern high corruption-risk areas, and should include values and controls to prevent corruption and ensure professionalism:</p> <ul style="list-style-type: none"> - recruitment of employees; - employee promotion; and - procurement. <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Are the core ethics policies in place? - Is there a policy register which can be shared with the committee indicating the list of policies and when these were last updated? - Do the municipality's policies align with the ethics strategy and vision of the municipality? - Was there a process after the ethics strategy has been adopted of revisiting existing policies to check for alignment with the strategy, and were any gaps then addressed? If not, the committee should guide that this should happen. 	
vi.	<p>Are ethical standards being institutionalised in the municipality?</p>	
	<p>Institutionalising ethics is about 'making ethics real'. It's about lifting the words off the Codes and policies which set out the expected ethical standards and communicating them to internal and external stakeholders so as to promote ethical behaviour.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - How is the municipality institutionalising ethics in the organisation? 	

No.	Ethics/Integrity Process	Check
	<ul style="list-style-type: none"> - Is it conducting ethics training? The committee should have a sense as to the rationale for, and approach to, ethics training to determine whether training is spread widely across the municipality, as well as whether the issues of concern that were highlighted through the ethics risk assessment are being used to inform training. - Are there structures, systems, and processes in place to familiarise the employees and supply chain with the municipality's ethics standards? - How is the municipality creating awareness around ethics/integrity? What are the mechanisms that are being used? Are these available to all employees? - With an understanding of the key ethics risks from the ethics risk assessment the committee should ask as to how these risks are being managed? Specific questions could include queries around typical high ethics risk areas such as conflicts of interest management, management of gifts, and management of declaration of interests. - Does the municipality monitor adherence to its ethics standards by all contracted stakeholders? How is this being done? - Does the municipality respond to breaches of ethical standards in a manner that will prevent reoccurrence? - Is ethics part of performance management system? How is it being done? - Are there reporting mechanisms for safe reporting of unethical behaviour? Are these being utilised? What are the trends? 	

No.	Ethics/Integrity Process	Check
vii.	<p>Is the ethics performance of the municipality being measured/monitored? If so, how?</p>	
	<p>The ethics office should monitor the implementation of the ethics strategy and its ethics management plan so that it can track progress, identify material ethics risks and trends, and report on efforts to build an ethical culture within the municipality.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - How is the ethics performance of the municipality being measured? - What are the indicators which are being looked at? - How is the municipality evaluating the extent to which ethics is becoming part of its culture? 	
viii.	<p>Is the ethics performance of the municipality being reported on to the relevant structures within the municipality?</p>	
	<p>The ethics office should report, at least quarterly, on the municipality's ethics performance to the Integrity Champion, the Ethics/Integrity Working Group, the senior management team of the municipality, as well as the eEthics/Integrity Oversight Committee.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Is the ethics office reporting on how the ethics performance of the municipality is being measured? - Is the ethics office reporting on the ethics performance of the municipality? 	

Checklist: Oversight reactive processes

In terms of the oversight over the reactive anti-corruption elements, possible questions which the committee can ask to exercise oversight would include the following:

No.	Reactive anti-corruption elements	Check
i.	Is an investigation policy / response plan in place?	
	<p>The municipality should be clear on how it will deal with investigations should they occur. There must be a standard operating procedure to guide how investigations should be dealt with.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Does the municipality have a policy that sets out procedures for conducting investigations? - Are there mechanisms to ensure real independence where the Municipal Manager, senior managers or councillors are implicated? - Does the policy align with the MFMA: Municipal Regulations on Financial Misconduct Procedures and Criminal Proceedings? 	
ii.	Is there capacity to conduct investigations?	
	<p>Investigations do not necessarily happen all the time, but when they are needed arrangements should be in place to move quickly.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Is there internal capacity, or are arrangements in place to ensure independent external investigations should the need arise? 	
iii.	Are investigations conducted in a reasonable timeframe?	
	<p>Investigation durations will vary depending on the complexity of allegations. In instances where MECs conduct investigations in line with the Systems Act, they are expected to provide feedback to the Minister within 90 days (calculated from the date in which the investigation was instituted). This should, therefore, be taken as a good guideline.</p>	

No.	Reactive anti-corruption elements	Check
	<p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Are investigations on average completed in a reasonable timeframe? - If not, what are the reasons for delays, and how are these being addressed? 	
iv.	<p>Are cases taken through to complete resolution?</p>	
	<p>The committee should receive a report on all cases up to their resolution.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - What happens after the investigations? - Are the recommendations implemented? - Is timely and fair disciplinary action implemented? - Do people face consequences as they should? Are monies recovered? - Are individuals held accountable for gross negligence? - Are cases reported to SAPS? 	
v.	<p>Are successes communicated?</p>	
	<p>Communicating successes builds trust in the accountability processes.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Are successes being communicated? If so, how and to whom? 	
vi.	<p>Is there transparency over how cases are dealt with?</p>	
	<p>Transparency is ensured by communicating openly with internal and external role-players as a matter of course.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Does the municipality communicate allegations and outcomes in line with the requirements set out in the MIMF? 	

No.	Reactive anti-corruption elements	Check
vii.	Is there an information management system in place?	
	<p>All of the above information can only be reported to the committee if there is a good information management system in place.</p> <p>Questions which the committee can ask:</p> <ul style="list-style-type: none"> - Is an information management system in place and is the information updated frequently? 	

Continuously monitor progress with the implementation of the strategy. (MIMF)

Both the ethics/integrity strategy as well as the anti-corruption strategy of the municipality will set out aims, objectives, and priorities, and be accompanied by respective implementation plans. The Ethics/Integrity Oversight Committee should monitor progress with the implementation of each of these strategies. This will mean that the committee should have copies of the implementation plans, and the reports which it receives should speak to progress in achieving these plans.

Where there is lack of implementation there should be a response. This could include improved support and resources or holding non-performing officials accountable. (MIMF)

In engaging with the reports which it receives, the implementation plans for the ethics/integrity strategy, as well as the anti-corruption strategy, the committee should look out for areas where implementation is falling behind, and probe these areas further to understand what is hampering implementation. Based on this understanding, the committee should then discuss possible ways in which these obstacles can be addressed. This could include directing that there be improved support or resources made available by the MM to ensure the effective implementation of the ethics/integrity program. The MIMF also provides that in instances where the committee may find that there is a lack of implementation due to officials who may not have been performing as expected, these officials should be held accountable.

2.1.3. Terms of Reference

It is important that Terms of Reference be drawn up for the Ethics Oversight Committee to reflect the delegations from council, and the responsibilities of the committee. This will assist in ensuring clarity and avoid duplication of functions with other committees.

Key aspects that should be included in the Terms of Reference:

1. Name of the committee
2. Mandate
3. Responsibility
4. Reporting
5. Meeting arrangements

2.2. Other committees with ethics/integrity mandates

The MIMF cites the following two mechanisms through which Council is able to exercise oversight over the reactive ethics management (consequence management) processes within the municipality.

Given the distinction between Council and administration, the processes for dealing with councillors are separate from that for officials. The Speaker is responsible for managing all processes related to the conduct of councillors as well as the training and capacitation of councillors. Within the administration, the Municipal Manager as the Accounting Officer is responsible for managing all matters related to officials.

2.2.1. Council Disciplinary Committee

The MIMF recommends that municipalities establish a Council Disciplinary Committee to deal with matters of ethics and discipline of councillors.

When councillors breach the Councillor Code of Conduct as set out in the Municipal Structures Act or transgress council rules or ethics requirements, the Council Disciplinary Committee is then tasked with ensuring that the matter is investigated, and appropriate disciplinary action is taken.

The committee is established as a section 79 committee which reports to council and would consist of councillors.

Some municipalities tend to refer to this committee as the Council Rules and Ethics Committee or the Council Ethics Committee. The MIMF states that the term 'Council Disciplinary Committee' is deemed more appropriate as the focus is on the disciplinary steps to be taken against councillors who transgress their expected conduct standards. This committee does not consider the ethics of the municipality or the management of ethics within the municipality.

2.2.2. Disciplinary Board

With respect to oversight over allegations and outcomes against municipal employees the MIMF provides that: The municipal council must provide oversight of allegations and outcomes as set out in the *MFMA: Municipal Regulations on Financial Misconduct Procedures and Criminal Proceedings* (2014).

Section 173 of the Municipal Finance Management Act sets out financial offences by both municipal councillors and municipal officials. These offences would typically be managed in terms of the processes as set out in the applicable Codes of Conduct,

Applicable Codes of Conduct

The Code of Conduct for Councillors is contained in Schedule 7 of the Local Government Municipal Structures Act 117 of 1998 as amended.

The Code of Conduct for Municipal Staff Members is contained in Schedule 2 of the Local Government Municipal Systems Act 32 of 2000 as amended.

The *MFMA: Municipal Regulations on Financial Misconduct Procedures and Criminal Proceedings* (2014) sets out processes and procedures that a municipality must follow when dealing with allegations of financial misconduct against officials as well as political office bearers. In the case of allegations of financial misconduct against municipal officials, the Regulations require municipal councils to establish a disciplinary board.

A disciplinary board is intended to be an independent advisory body which assists council with the investigation of allegations of financial misconduct and provides recommendations on further steps to be taken by council regarding disciplinary proceedings.

The regulations provide for the disciplinary board to conduct a preliminary investigation into the allegation and, if need be, a full investigation to determine the merit of a specific allegation.

The disciplinary board does not necessarily have to conduct such investigations itself. A disciplinary board can request existing structures within the municipality, province, or national government to conduct such investigations and provide the necessary reports with recommendations. For this purpose, the Accounting Officer should ensure that a delegation is in place to ensure operational efficiency and effectiveness.

The disciplinary board is made up of (no more than five) municipal officials and external representatives and may be constituted as follows:

- 6) A disciplinary board may consist of-
 - (a) the head of the internal audit unit within the municipality or municipal entity or representative of an organisation performing internal audit functions for the municipality or municipal entity if the internal audit function is outsourced;
 - (b) one member of the Audit Committee of the municipality or municipal entity;
 - (c) a senior manager from the legal division in the municipality or municipal entity;
 - (d) a representative of the National Treasury or the provincial treasury; and

- (e) any other person as may be determined by the municipal council or board of directors of a municipal entity.

Section 4(6) of the MFMA: Municipal Regulations on Financial Misconduct Procedures and Criminal Proceedings (2014)

In order to ensure the independence of the role of the disciplinary board, regulation 4(5) expressly disqualifies councillors or political office bearers from being part of the disciplinary board.

2.3. Where do committees overlap?

Let us recap the governance structures as set out in the diagram below.



The oversight reports from these structures enable council to exercise its governance and oversight role.

Committee	Source	Proactive	Reactive
Council Ethics/Integrity Committee	MIMF	Ethics Programme	Anti-Corruption Strategy
MPAC	S79A Municipal Structures Act	Could be included by Council as part of MPACs ToR (optional)	
Council Disciplinary Committee	S79 Municipal Structures Act as well as Schedule 7		Ethics of individual councillors
Disciplinary Board	MFMA Municipal Regulations on Financial Misconduct Procedures and Criminal Proceedings (2014)		Investigates financial misconduct of officials

The table above shows that there is no overlap between the mandate of the Council Ethics/Integrity Committee, the Council Disciplinary Committee, and the Disciplinary Board as they each have very clear and distinct mandates.

MPACs role is set out in s79A of the Municipal Structures Act and does not expressly include oversight over ethics/integrity. This oversight role can, however, be included by Council as part of MPACs mandate. Should Council opt to utilise MPAC as the Ethics/Integrity Oversight Committee there would then be no need for a separate Ethics/Integrity Oversight Committee.

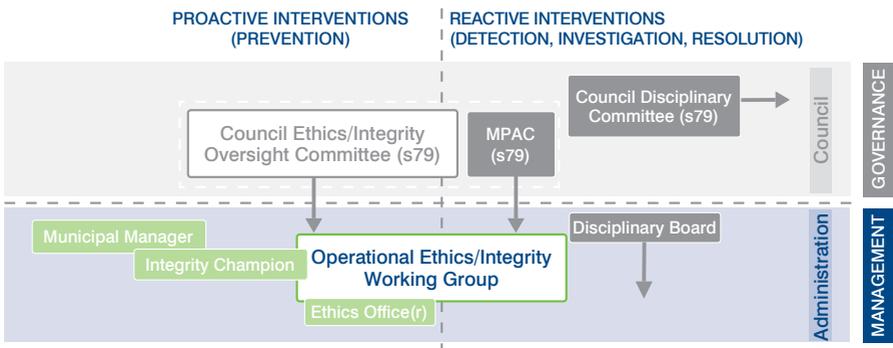
In this Chapter we will unpack the second part of MIMF Principle Three which relates to municipalities having sufficient capacity in place to implement the integrity management requirements.

MIMF Principle Three: Governance structures and Capacity



The MIMF provides that Mayors and Municipal Managers should drive and support the implementation of the framework. They can, however, not do the work on a day-to-day basis. There also needs to be a group of professionals within the administration of the municipality who should implement the MIMF.

The various role-players responsible for the implementation of the municipality's Integrity Management Programme, as set out in the MIMF, are depicted in the diagram below:



3.1. Municipal Manager

The Municipal Manager as the Accounting Officer of the municipality is responsible for the administration of the municipality.

MIMF Principle One: Leadership Commitment

Accounting Officer responsibilities

The Accounting Officer should:

- provide ethical leadership to the administration of the municipality;
- ensure that the municipality has a strong programme in place to both promote integrity and fight corruption; and
- allocate sufficient resources for the implementation of the integrity management requirements.

Municipal Integrity Management Framework (2015)

To encourage Municipal Managers to take their responsibility seriously, the MIMF stipulates that the successful implementation of the MIMF should form part of the Municipal Manager's performance contract. What gets measured gets managed.

3.2. Integrity Champion

The Municipal Manager should assign the responsibility to champion the integrity management initiatives of the municipality to a member of the senior management team. The Integrity Champion is not a full-time dedicated function. This person then takes on the role of the Integrity Champion and conducts this role in addition to their primary role in the municipality.

MIMF Principle Three: Governance Structures

3.4. Integrity Champion

A member of the senior management team should be assigned the responsibility to champion the integrity management initiatives of the municipality.

Municipal Integrity Management Framework (2015)

The Integrity Champion is ideally a member of the municipality's senior management team (s56 manager) who has been assigned the responsibility by the Municipal Manager to advocate for, and champion the municipality's integrity management initiatives.

Who should be the Integrity Champion?

Ideally the Integrity Champion is someone of high legitimacy and credibility – someone who has successfully facilitated similar initiatives in the past such as, for example, culture change.

Adapted from the Ethics Office Handbook (2018)

The key task for the Integrity Champion is to drive the integrity management programme, provide strategic direction, and ensure that the ethics initiative gains and maintains momentum. Being a member of the municipality's senior management team, the Integrity Champion is expected to advocate for the ethics/integrity programme at senior management meetings and take ownership for and drive the programme. This is a high-level strategic role.

3.3. Ethics office(r)

The MIMF further provides that there needs to be capacity in place within the municipality to implement the municipality's integrity management initiatives.

MIMF Principle Three: Governance Structures

3.5. Integrity Management Capacity

a) An official or unit should be delegated the responsibility for co-ordinating or implementing the municipality's integrity management initiatives.

Municipal Integrity Management Framework (2015)

The person in a municipality that is tasked with the responsibility of co-ordinating and/or implementing the municipality's integrity management initiatives is generally known as the ethics officer.

In many municipalities, the ethics officer function is being undertaken on a part-time basis by people with other responsibilities. The ethics officer function in municipalities tends to be allocated to individuals in the risk or governance functions, or in the HR function. The MIMF does not specify which unit should be responsible for ethics management.

In larger municipalities, the ethics function might require more staff and – instead of having only one ethics officer – there may then be a fully-fledged ethics office with multiple staff members.

Please refer to TEI's Ethics Office Handbook for guidance around considerations for the location of an ethics office.

Section 23 of the Public Service Regulations (2016) provides guidance on the role of ethics officers in ethics management in the public service and could be adapted for municipalities. These responsibilities include:

- Promote integrity and ethical behaviour in the department;
- Advise employees on ethical matters;
- Identify and report unethical behaviour and corrupt activities to the Accounting Officer;
- Manage the financial disclosure system; and
- Manage the process and systems related to extra remunerative work.

Components of the MIMF can be implemented by different officials or units, depending on the current arrangements and capacity of the municipality. This accords with the sentiment that "ethics is everyone's business".

The MIMF recognises that all municipalities are different and have varying capacity levels. It therefore provides that in instances where municipalities do not have the capacity

internally to implement the MIMF, they should look to shared service arrangements; for example with district municipalities.

The Northern Cape Provincial CoGTA has been exploring this concept of shared service arrangement for integrity management capacity across municipalities as the province's municipalities tend to be relatively small.

3.4. Ethics/Integrity Working Group

Whilst not provided for in the MIMF, municipalities are encouraged to establish an operational Ethics/Integrity Working Group within the administration as good practice. The primary purpose of this Working Group is to facilitate better co-ordination and integration of ethics initiatives in the municipality. It will also ensure support for the implementation of the municipality's ethics programme.

The Ethics/Integrity Working Group should ideally be a multi-disciplinary group which is chaired by the Integrity Champion. The Working Group members should be nominated by the Municipal Manager. Ideally these should be the Executive Directors or Heads representing the diverse units across the municipality as ethics is everyone's business. The following are some of the key departments who should form part of the Ethics/Integrity Working Group: Ethics Office, HR, Legal, Risk, Municipal Manager's Office, Communication, and Speaker's Office.

It is recommended that Internal Audit should not form part of the Working Group as they will be tasked with auditing the effectiveness of the ethics programme, and therefore need to retain their independence. There are, however, some municipalities where the Internal Audit function is responsible for forensic investigations, and as such would be an important member of the Working Group. In such situations, the Internal Audit function should consider outsourcing the auditing of the ethics programme to ensure independence is retained.

Ideally the Ethics/Integrity Working Group should be a dedicated working group whose focus is solely on ethics management, co-ordination, and integration. It should meet quarterly and *ad hoc* when necessary.

Should it not be practically possible to have a dedicated Ethics/Integrity Working Group, it may also form part of an existing operational committee within the administration. It is, however, important to ensure that sufficient time is allocated for the discussions around the co-ordination and integration of ethics initiatives. One option could be for the Ethics/Integrity Working Group to be a sub-committee of an existing committee such as a Risk Committee. The deliberations are done in sub-committees and reports then made to the main committee, thereby ensuring sufficient time is allocated to the discussion.

It is important for the Ethics/Integrity Working Group to have a Terms of Reference to reflect its roles and responsibilities. Some of its key responsibilities are to:



- guide the ethics/integrity initiatives in the municipality;
- provide direction to, and input on the ethics/integrity programme;
- support the implementation of ethics/integrity programmes and initiatives;



- ensure that its members act as ethics ambassadors;
- ensure integration and collaboration of various ethics-related functions (such as anti-fraud and anti-corruption, investigations, human resources, etc.);



- ensure that the identification, recording, and effective management of conflict of interest situations take place;
- consider ethics training, ethics risk assessments, codes of ethics and policies, and implementation of ethics standards;



- monitor and report on ethics management in the organisation; and
- report on its activities to the Council Ethics/Integrity Oversight Committee through the Integrity Champion.

In this Chapter we will focus on reporting to and by the Council Ethics/Integrity Oversight Committee.

The LGACS has specific focal areas to:

- a) improve oversight of investigations and consequence management, and
- b) improve information management.

These focal areas find expression in Principle Five of the MIMF:

Principle Five of the MIMF: Reporting

Effective information management systems should be implemented, and municipalities must submit reports to appropriate entities to ensure transparency through monitoring, oversight and accountability.

Municipal Integrity Management Framework (2015)

In effect this means that those working to manage both the proactive and reactive elements of the Integrity Management Programme should:

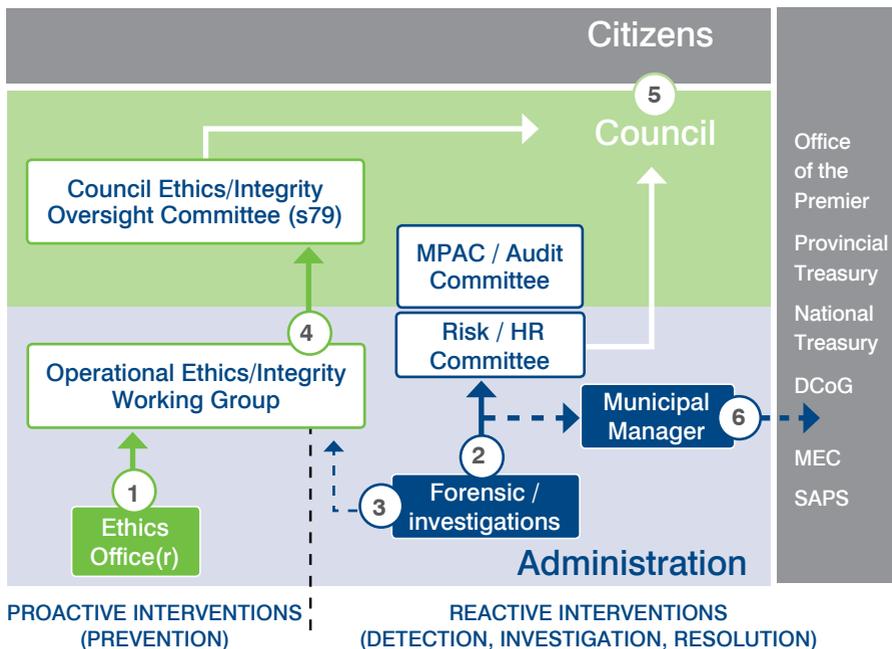
- a) Keep information in a suitable information management system; and
- b) Report this information in an accessible and well-structured report to the relevant committee to keep them informed of the progress and challenges in the programme.

The committees who receive the reports will in their turn be responsible for reporting the key issues to Council, so that it can fulfil its function of governing the ethics of the municipality “in a way that supports the establishment of an ethical culture” (King IV, Principle 2).

A vital part of the MIMF is the requirement for the municipality to also report to external stakeholders to improve transparency and accountability.

4.1 Flow of reports

A possible flow of reports is shown in the following diagram:



Below follows a description of the diagram:

Proactive initiatives

- 1) The ethics officer will report all pro-active initiatives, systems, and trends to the Ethics/Integrity Working Group on at least a quarterly basis.

Reactive initiatives

- 2). Those responsible for conducting investigations will report the detail and trends of the matters being investigated to their relevant oversight structures. These oversight structures can include MPAC, Audit, and Risk Committees.
- 3) At the same time, those responsible for investigations will also give a more high-level report on the systems and trends related to investigations and outcomes to the Ethics/Integrity Working Group.

Consolidated report

- 4) The Ethics/Integrity Working Group will submit a consolidated report on the municipality's integrity (with their comments) to the Council Ethics/Integrity Oversight Committee, who will in turn submit a high-level report to Council on critical matters.

Reporting to external stakeholders

- 5) Council will include a submission in the annual report to inform citizens and other stakeholders of the state of ethics at the municipality.
- 6) The Municipal Manager (or his/her delegate) will report on ongoing matters under investigation (and their outcomes) to:
 - The Mayor;
 - The MEC for local government in the province;
 - The national department responsible for local government;
 - The provincial treasury;
 - National Treasury; and
 - Auditor General.

The MIMF has a detailed list of requirements for what needs to be reported.

In some provinces the Office of the Premier also plays a strong anti-corruption co-ordination role and requires reports. Criminal matters must also be reported to SAPS.

Effective Information Management

The Ethics Institute is currently collaborating with the Gauteng Provincial Government and Gauteng's municipalities as part of the Gauteng Municipal Integrity Management Project to improve the information management in municipalities and to bring more uniformity in what is reported to oversight departments.

The information management system that is being developed includes templates for keeping information on:

- Ethics structures and strategy
- Training and awareness initiatives
- Ethics advice
- Disclosures of interest
- Vetting of staff
- Case management for detection, investigation, and resolution of matters.

Queries regarding this information management system can be directed to The Ethics Institute.

For more on ethics reporting see The Ethics Institute's free resource, The Ethics Reporting and Auditing Handbook (available at: www.tei.org.za/handbooks/).

4.2. Framework for reporting

It is always useful to consider the format of the report from the Ethics Working Group to the Ethics/Integrity Oversight Committee before hand and for the Integrity Champion to discuss this with the Chair of the Oversight Committee so that there is agreement around the content and structure of the report, whilst ensuring that the Committee is adequately able to exercise its mandate in terms of oversight.

The following framework has been suggested by TEI for reports to Ethics Committees. It can be used as a guide for the reports from the Ethics/Integrity Working Group to the Council Ethics/Integrity Oversight Committee.

1. Progress with implementation

- How is implementation of the ethics/integrity programme progressing (both proactive and reactive)?
- Where can the Committee assist with blockages?

2. Trends

What story does the data convey about:

- Training and awareness
- Disclosures of interest
- Gifts
- Approval for external remunerative work
- Ethics advice requests
- Ethics transgressions (including hotline reports), their investigation, and resolution?

3. Critical incidents

- Are there any major events that have occurred in the reporting period that the Ethics/Integrity Oversight Committee should be aware of; for example investigations involving senior members of staff, or with an impact on communities?

4. Strategic considerations

- Are there external or internal events that require revisiting the ethics strategy; for example, regulatory changes?

This guidebook sets out many practicalities about the various committees that play a role in exercising oversight over a municipality's ethics/integrity and anti-corruption programmes. The purpose of these committees is to raise the standard of professional ethics in the municipality. In running these committees and implementing their programmes, municipalities should however ask themselves:

- Are the pro-active initiatives contributing to building a professional ethical culture that benefits service delivery?
- Are the reactive initiatives ensuring consistent, fair, and timely accountability?

We trust that this guidebook will benefit current and future members of ethics committees and will hopefully lead to improved governance in municipalities as well as positively impact on improving service delivery and accountability by municipalities to citizens.

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Fatima has a keen interest in governance, ethics management, anti-corruption, compliance and regulation. She has extensive experience in working with and supporting the public sector both as an official and as a public sector management consultant.

Fatima is involved in TEI's advisory and consulting activities for a diverse range of clients from both the public and private sectors. She has been part of ethics risk assessments teams in organisations, trains and facilitates on ethics, and is part of the faculty for TEI's Ethics Officer Certification Programme. She is also a key team member on the Gauteng Municipal Integrity Project as well as the Local Government Ethical Leadership Initiative.

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Kris's main focus has been in corruption prevention where he has been involved in policy-, training-, and resource development. He has consulted to government on numerous occasions in the development of anti-corruption and ethics management standards and guidelines applicable to all public service entities. He has also conducted a public service-wide audit on the anti-corruption capacity of government departments. He is currently a member of the National Anti-Corruption Strategy Reference Group, and served on the Global Reporting Initiative's Anti-corruption Working Group for the development of the GRI's G4 reporting standard.



Local Government Ethics Committee Guidebook

Even though the Municipal Integrity Management Framework has (since 2015) required that a committee provide oversight of ethics management in municipalities, there has been limited progress in this regard. From our engagements with municipalities, it seems that there is still some confusion about the role and activities of this committee.

This guidebook seeks to provide clarity and practical guidance to municipalities on how to go about getting value from these committees.

It is hoped it will be a resource to councillors and officials who are engaged with the management of ethics/integrity, and anti-corruption.

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