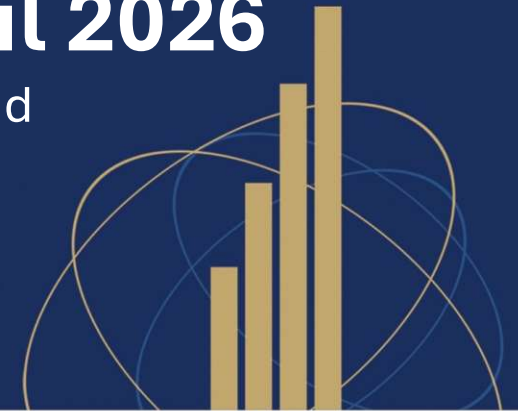




22 April 2026

National Corruption Risk and
Prevention Framework (NCRPF)



www.cigfaro.co.za

Thulani Mkhungo (CRO)
Special Investigating Unit (SIU)

SAQA Recognised Professional Body

DRAFTING PROCESS

Drafting Process and National Anti-Corruption Strategy as the base

Internal existing Prevention Framework was a base, and it is derived from the NACS Pillar 6

Additional work required on Corruption Risk Management, particularly scientific approaches to the identification of sectors, organisational features and processes vulnerable to corruption

Public engagements during drafting of the framework in the similar way the NACS was consulted widely

Public Engagement – Prior to drafting

Engagements Prior to drafting process

Online meeting – open to the public

Interviews:

- BUSA
- Corruption Watch
- Office of the Auditor General
- GIZ
- UN Office on Drugs and Crime (UNODC)

Written Submissions:

Legal Resources Centre

Dept. of Public Service & Administration (DPSA)

Institute of Risk Management of South Africa (IRMSA)

World Bank

Human Sciences Research Council (HSRC)

(draft 5)

Consultations on the draft

NCRPF Consultation road

JCPS Cluster – recommended for FOSAD

FOSAD

NACAC – Communication Workstream

NACAC

DPSA

DWYPD

NSG

AGSA

State Capture Comm

9 Provincial Provinces through Premiers Offices

Sectoral Consultations

- National Government, SOEs, SALGA
- Civil Society, Traditional Leaders, Religious Leaders and Organised Labour
- Business, Academia, Research Councils, Professional & Regulatory Bodies
- Media, Political Parties, International Organisations

INTRODUCTION OF THE FRAMEWORK



NACS Six (6) Key Pillars

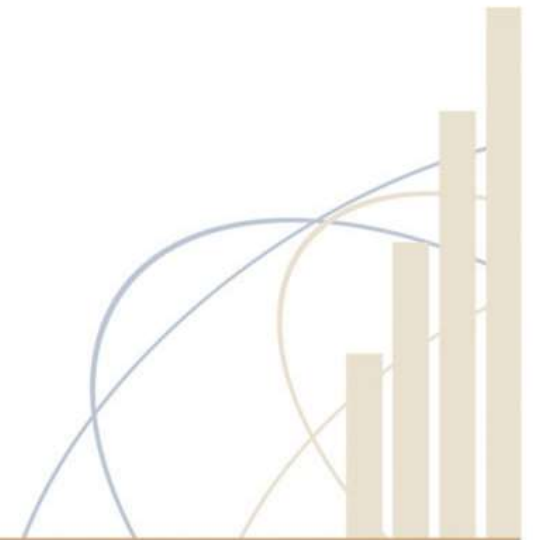
Promote and encourage	Promote and encourage active citizenry, whistleblowing, integrity and transparency in all spheres of society.
Advance	Advance the professionalization of employees in all sectors to optimize their contribution to create corrupt-free workplace.
Enhance	Enhance governance, oversight and consequence management in organizations.
Improve	Improve the integrity and credibility of the public procurement system.
Strengthen	Strengthen the resourcing, coordination, cooperation, performance, accountability and independence of anti-corruption agencies.
Protect	Protect vulnerable sectors that are most prone to corruption and unethical practices with effective risk management.

Introduction - NPCOC

NACS Pillar 6

NPCOC Prog 4 that is convened by the SIU has been mandated to implement Pillar 6 of the National Anti-Corruption Strategy (NACS), which is focused on “Protection of Vulnerable Sectors

A vulnerable or high-risk sector is regarded as an area, sector and/or institution with a high risk or specific vulnerability to the manifestation of corrupt/unethical practices or activities.



Introduction - Rationale for Framework

Part of implementation programme for the National Anti-Corruption Strategy 2020-2030 (NACS)

Risk-based approach to corruption – emphasis on prevention – Framework focuses more on proactive rather reactive approach – premised on the NACS approach “*prevention must have more emphasis than reaction.*”

Rationale for Framework, cont

Emphasis on preventative measures:

- Lifestyle Audits
- Data analytics
- Integrity checks or full screenings
- Vetting process
- Vulnerable Sector Risk Approach

Constitutional injunction to comply with international obligations

Guiding principles underpinning Framework

Whole-of-society approach

Good Governance

Rely on scientific approaches to risk management and supplement these with context-specific guidance on the identification, analysis, evaluation of corruption risks and related treatment options

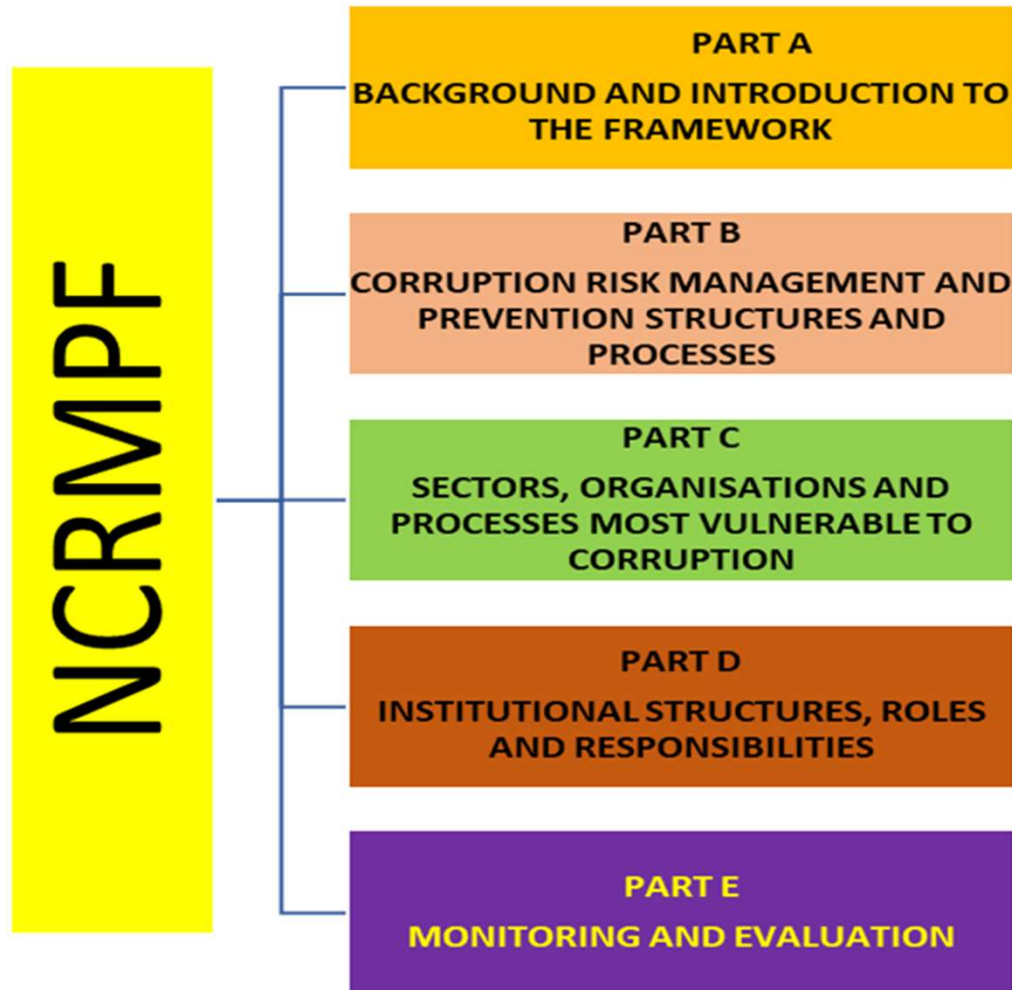
Integration with cross-cutting policies and compliance obligations

Identify sectors, organisational features and processes that may increase corruption risks and provide guidance on possible responses

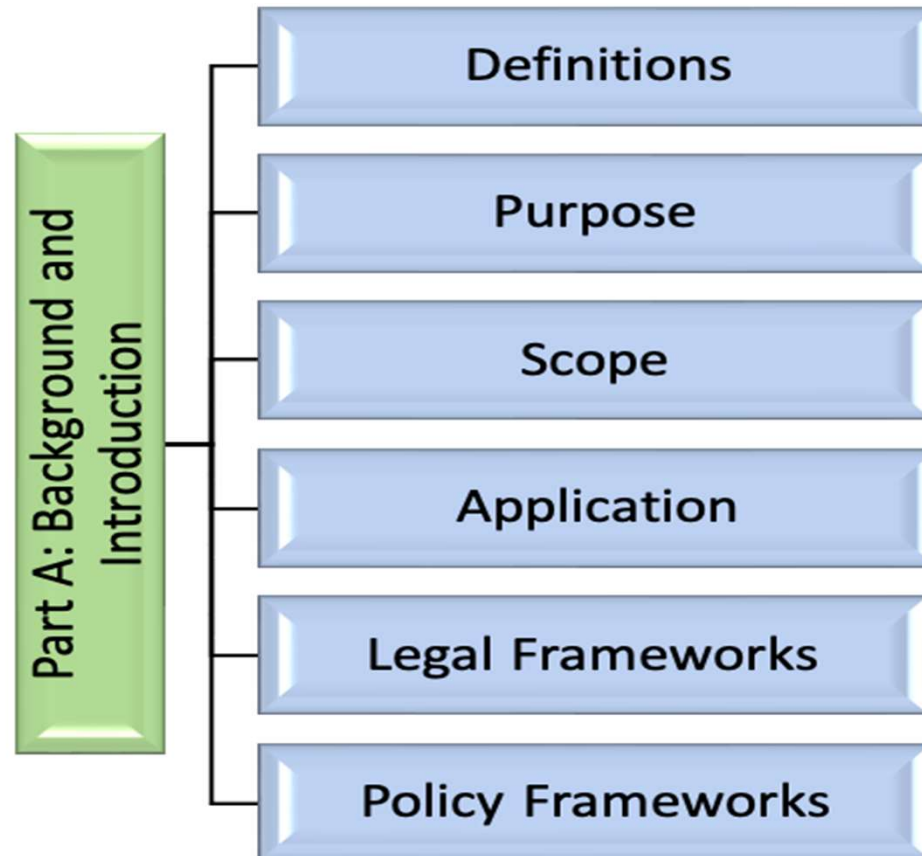
BROAD OUTLINE OF THE FRAMEWORK



Broad structure of framework



Part A: Background and Introduction



Salient features of Part A



Scope and application wide to accommodate whole-of-society approach emphasised in the NACS



Constitutional and international-law obligations

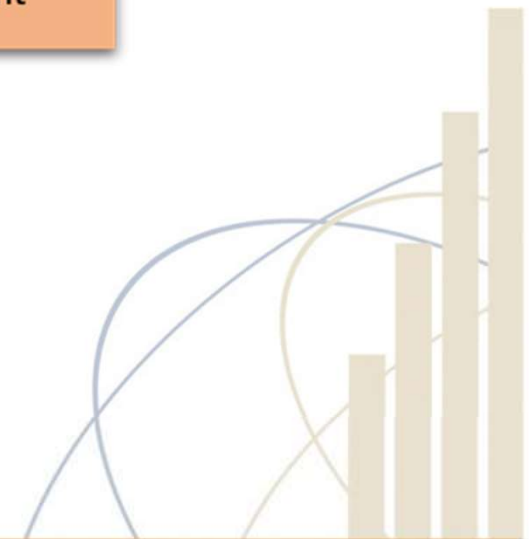
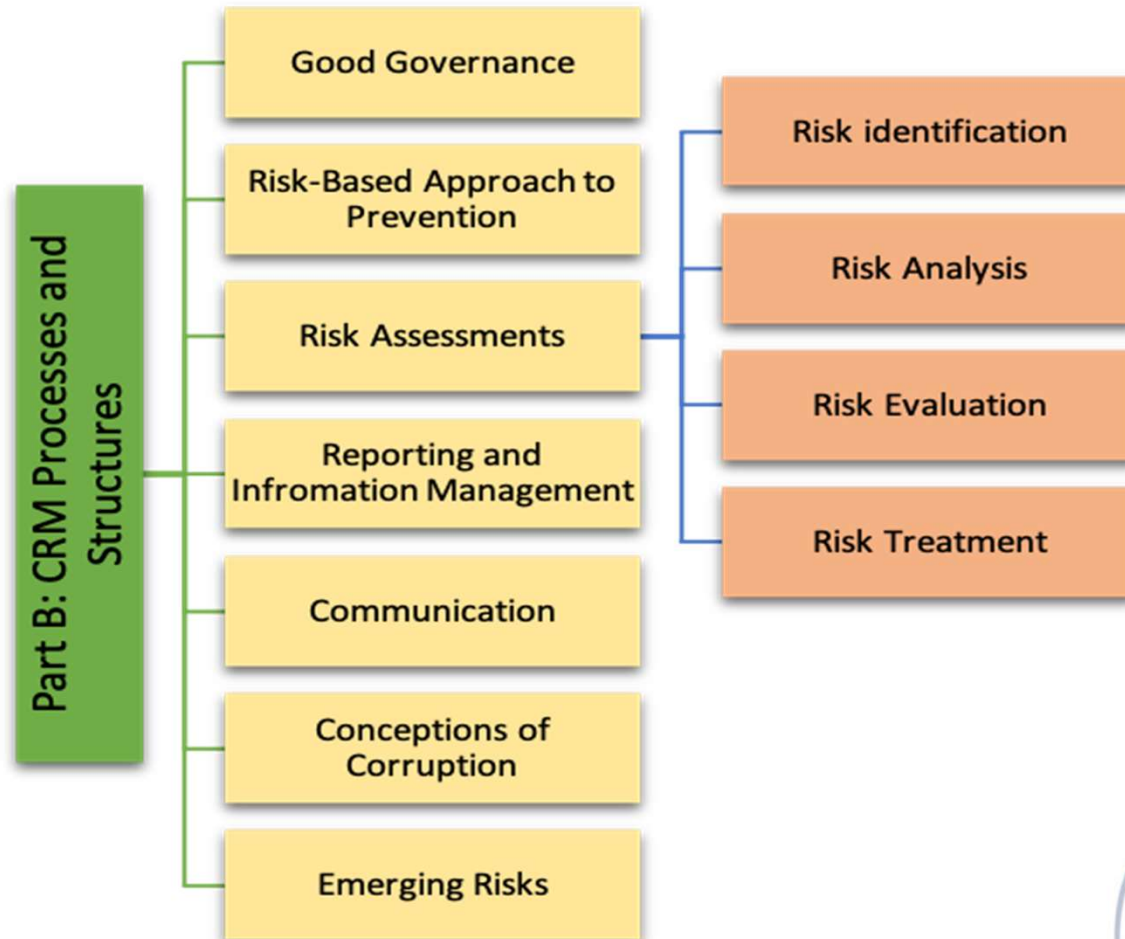


Domestic legislative framework



The NACS, King V Report on Corporate Governance, Batho Pele

Part B: Risk management and prevention processes and structures



Part B: Risk management and prevention processes and structures

Focus in part B shifts to organisational structures – with a focus on prevention

Lifestyle reviews, lifestyle audits and investigations

Data analytics (data mining & data matching), including the use of AI & machine learning in these processes

Due diligence, including integrity checks & other vetting procedures (s 34A of PRECCA; s 26 & chapter 3 of Procurement Act, 2024)

Importance of inter-agency collaborations, within SA and cross-border – bilateral or multilateral agreements & working relationships

Salient features of Part B

Anti-corruption endeavours as central components of good governance

Risk-based approach to prevention

Risk assessment processes: Identification, Analysis, Evaluation, Responses

Reporting and information management

Communication, awareness-raising and training

Important that risk-based approaches embedded scientifically, but contextualised to be responsive to corruption-risks in particular – reflected in relative ‘balance’ of Framework, with more space devoted to Part C

Salient features of Part B (contd)

Conceptions of corruption, mechanisms of corruption and how these influence responses

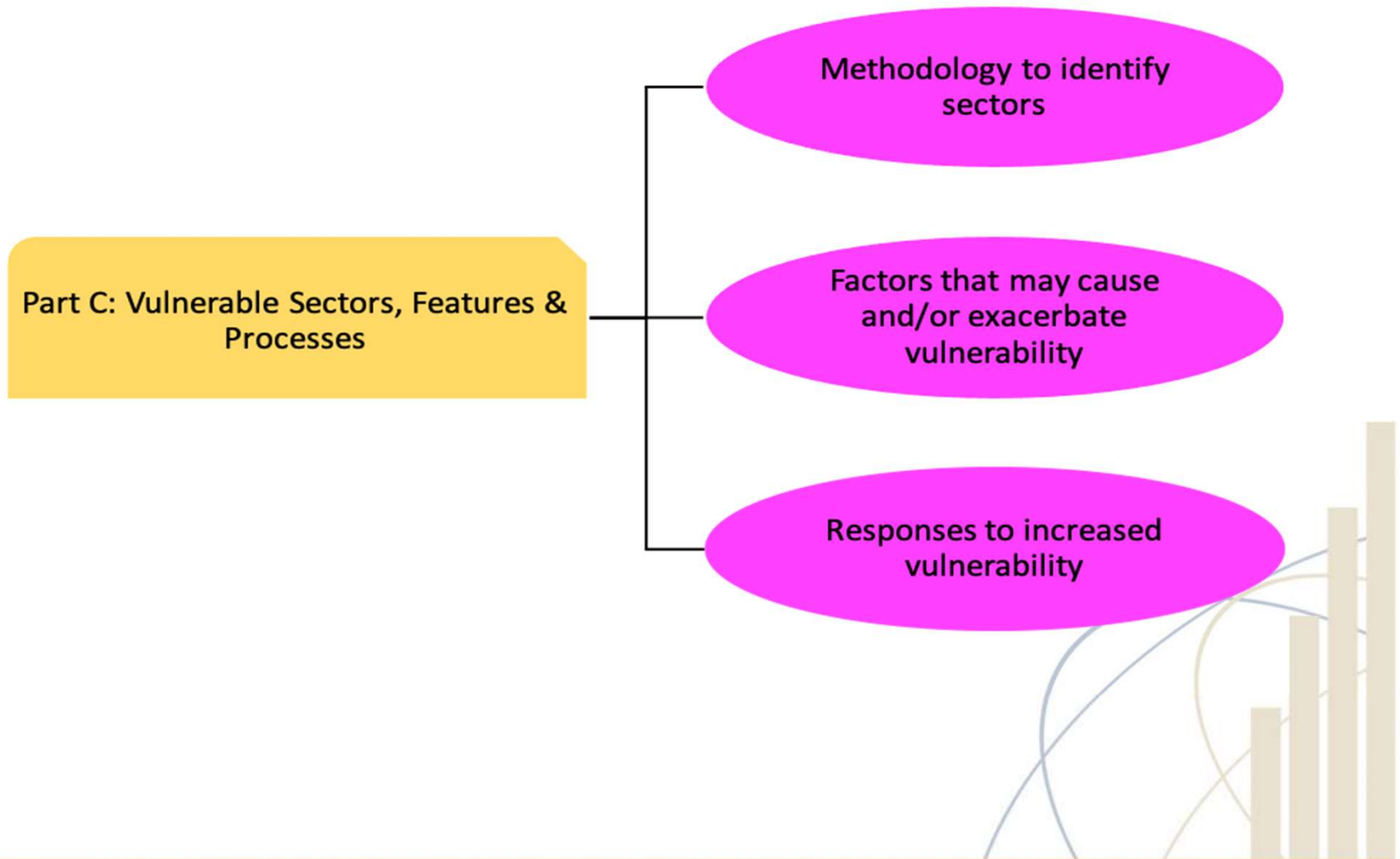
Centrality of information management and risk intelligence

Categorisation of many corruption risks as "emerging risks" and the implications thereof

Important questions for organisations to consider:

- Why are we doing the risk assessment?
- Is it a general risk assessment or a targeted risk assessment?
- What is the level at which the risk assessment is being done and is that the appropriate level?
- Have we planned appropriately to be able to conduct the risk assessment and have we resourced these activities sufficiently?
- Have we identified all the important stakeholders, and have we communicated effectively with them?

Part C: Sectors, Characteristics & Processes Vulnerable to Corruption



Part C: Sectors, Characteristics & Processes Vulnerable to Corruption

Part C expands on the risk assessment elements of Part B by providing guidance on sectors, organisations and organisational processes that may be more prone to corruption

Salient features of Part C



Identification of sectors, organisational features and processes not meant to be exhaustive or static



Methodology:



- SA government stated priorities + public engagement responses



- Research by international organisations and international and domestic regulatory bodies



- Academic scholarship

Salient features of Part C (contd)

Conceptions of corruption, mechanisms of corruption and how these influence responses

Centrality of information management and risk intelligence

Categorisation of many corruption risks as "emerging risks" and the implications thereof

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One or more of the following:

Factors that may cause and/or exacerbate vulnerability

- Specific transactions or types of transactions
- Specific projects or types of projects
- Specific activities or types of activities

Salient features of Part C (contd)

Planned or ongoing relationships with specific categories of associates

Specific categories of staff

Deficiencies in systems, procedures and practices

Unethical personal motivations

Internal controls

Organisation's history i.r.o corruption and other unethical conduct

Transactional factors

Payments

Financial indicators

**Sectors identified as
vulnerable**

Health

Extractive industries

Law enforcement

Adjudicative structures

Infrastructure and Construction

Education

Financial sector

Non-Profit Organisations (NPOs)



Vulnerable Sectors Identified by SIU



Health Sector



State Owned Entities



Education



Local Government



Minerals & Energy



Financial Sector



Infrastructure/Construction



Tourism Sector



SMMEs



Border Management & Immigration



Transport & Freight



NPO Sector



Water Sector



Real Estate



Tobacco & Alcohol

Key Stakeholders

Law
Enforcement
Agencies

Chapter 9
Institutions

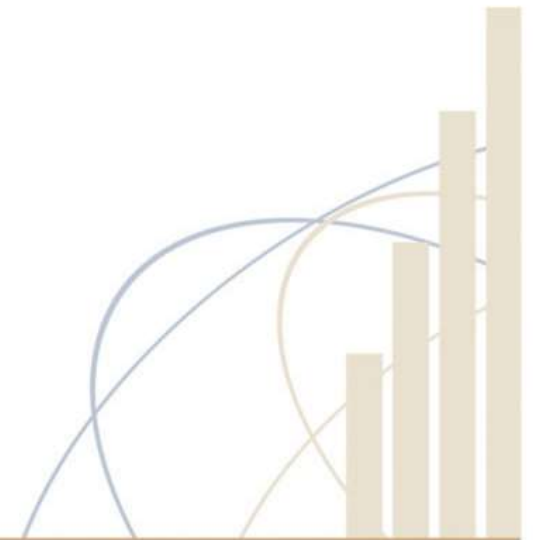
Civil Society

Private
Sector

Public
Sector

Traditional &
Religious
Leaders

Organised
Labour



**Corruption risks within
processes or functions**

- Corruption risk areas or processes in organisations may include:
- Procurement
- Revenue collection
- Recruitment and selection
- Discipline management
- Overtime management
- Licencing and permits
- Contract management
- Management of grants/subsidies

Vulnerable Sectors Identified

- Industry case studies & nature of business
- Magnitude of transactions and amounts involved
- Propensity of actors doing business with government
- High exposure of the sector to corruption
- National, foreign interest and security
- Government spending on the sector
- NDP focus areas and government priorities

Part D: Institutional Structures, Roles and Responsibilities



Salient features of Part D

Creation of risk
management
infrastructure

Diversity of approaches
because organisational
structures vary

**Functions involved in
corruption risk management
& prevention activities**

Compliance

Risk management

Legal

Internal audit

Accounting and finance

Procurement

Sales and marketing

Supply chain

Human resources

Corporate affairs/public relations

Central role players

- (i) Accounting Officers
- (ii) Chief Risk Officers
- (iii) Risk owners
- (iv) Risk champions
- (v) Risk co-ordinators
- (vi) Internal Auditors
- (vii) Law enforcement agencies
- (viii) Ethics Officers
- (viii) National Treasury
- (ix) Provincial Treasury
- (x) Chapter 9 Institutions
- (xi) NACAC
- (xii) NPCOC
- (xiii) Sectoral Anti-Corruption Forums



Collaborations

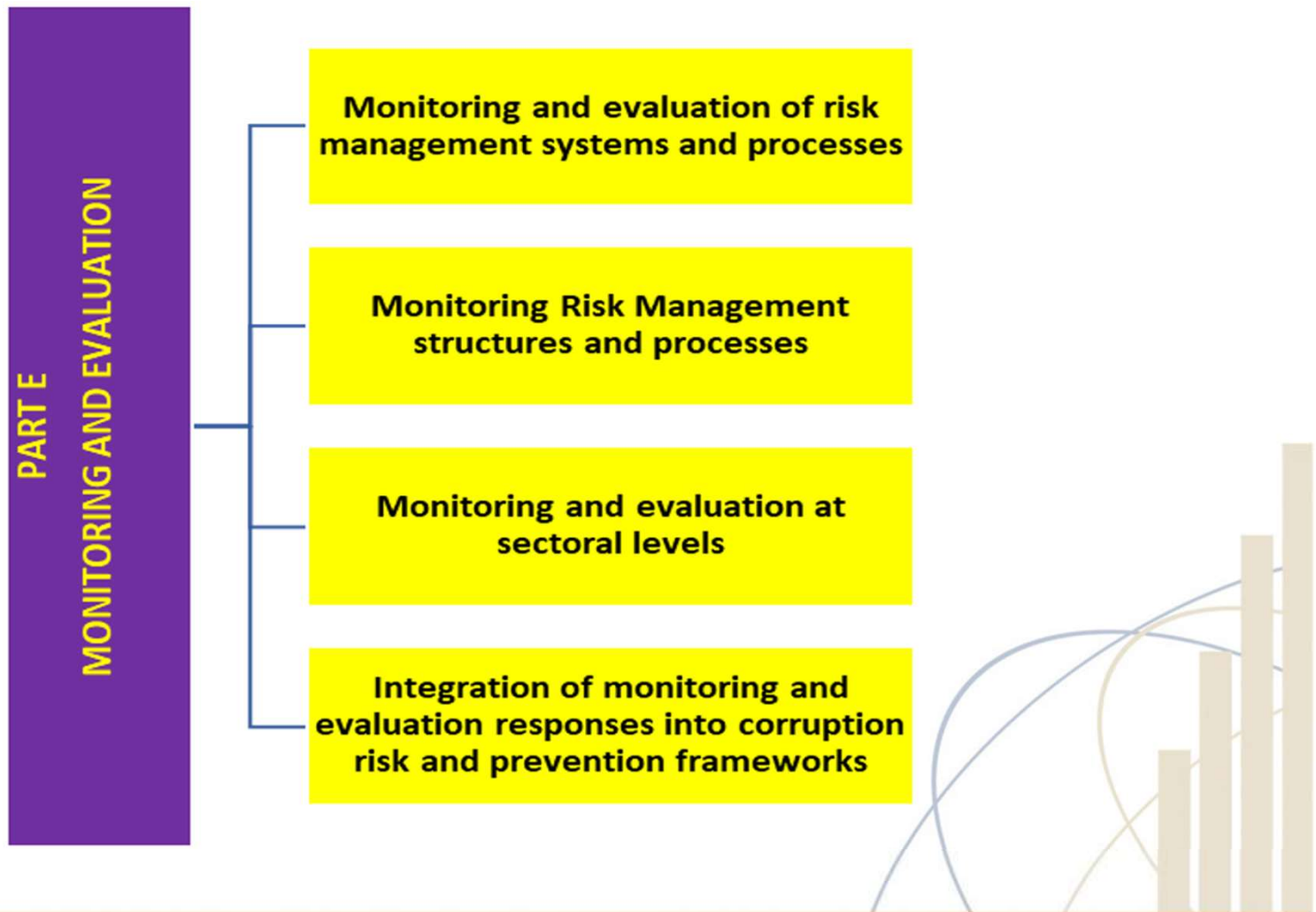
Within organisations

With external stakeholders

With and between sectoral anti-corruption forums

Collaboration agreements

Part E: Monitoring and Evaluation





Monitoring the process of implementation to ensure that the actions outlined in the Framework are being undertaken and that resources are being adequately allocated and utilised effectively.

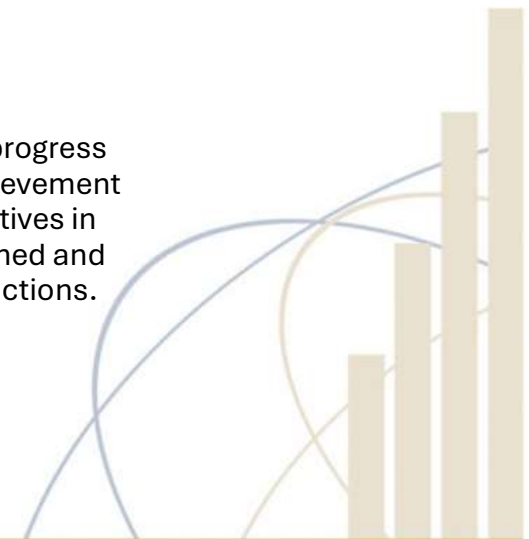


Monitoring the strategic impact of those actions in terms of reducing corrupt and unethical practices and facilitating a change of behaviour towards a value-based ethos in society.

Monitoring and evaluation of implementation of Framework at sectoral and national levels



Evaluating the progress towards the achievement of stated objectives in relation to planned and implemented actions.



Salient features of Part E

“a) what needs to be monitored and measured;

b) who is responsible for monitoring;

c) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;

d) when the monitoring and measuring shall be performed;

e) when the results from monitoring and measurement shall be analysed and evaluated;

f) to whom and how such information shall be reported”.

(ISO 31000 incorporated as SANS 31000 (2019))

Salient features of Part E (Cont)

Providing M&E results to decision-makers in all sectors in a readily accessible form that meets the end users' needs.

Using the information gained, through stringent review processes, to refine the Framework, where necessary, and to inform decision-making at all levels of government, and within the business and civil society sectors.

Regularly communicating the results of M&E activities to all stakeholders to increase support for the Framework, sustain its implementation and enhance accountability

NEXT STEPS





Submit the written submissions to
Mr Nxumalo
mnxumalo@siu.org.za



Before 05 May 2026

NEXT STEPS

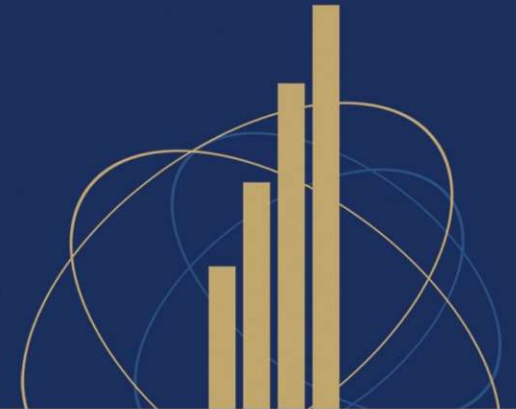


The final draft 6 will be presented
to JCPS in mid May for final
approval to be recommended for
Cabinet approval





Thank You!



CIGFARO
Chartered Institute of
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