

SWELLEN DAM MUNICIPALITY



INTEGRITY MANAGEMENT FRAMEWORK

VERSION	COUNCIL	APPROVED DATE	IMPLEMENTATION DATE

Contents

1. INTRODUCTION	3
2. OBJECTIVES OF THE FRAMEWORK	3
3. UNPACKING AND IMPLEMENTING FRAMEWORK AND STRATEGY	5
4. GOVERNANCE ARRANGEMENTS/ PROCESSES	7
5. CONCLUSION	8

1. INTRODUCTION

To be a well governed municipality that fulfils its obligations and delivers services to the community, we need effective, committed leadership and a professional, competent workforce. We also have a responsibility to manage our entrusted resources responsibly and to combat all forms of fraud, corruption and misconduct.

We strongly believe that none of the above will be possible without a strong ethical culture that enables all parties to focus on the right things for the right reasons. Swellendam Municipality is therefore committed to managing its organisational integrity more actively.

The South African Local Government Anti-Corruption Strategy of 2016 requires all municipalities to strengthen their resilience against corruption by implementing the Local Government Integrity Management Framework. This Integrity Management Policy Framework has been adapted to Swellendam's specific circumstances and needs.

2. OBJECTIVES OF THE FRAMEWORK

The Municipality will focus the following key objectives which we believe will improve the culture and manage our ethics risks.

1. Set a strong ethical tone with clear standards;
2. Develop a professional workforce, in a respectful workplace;
3. Actively manage operational fraud, corruption and ethics risks;
4. Ensure effective consequence management; and
5. Work with communities and service providers.

1. Set a strong ethical tone with clear standards (Leadership)

Swellendam Municipality is committed to strong ethical governance. To avoid us becoming complacent about our ethical standards we believe it is necessary to be more explicit about what we stand for and what we expect of each other. We therefore commit, as the political and administrative leaders of the Municipality, to developing a clear values-statement for the Municipality, and to ensure that this becomes embedded in our language and our actions. Our values will be supported by our policies and communicated to all our stakeholders in a way that conveys the importance that these values have to us.

2. Develop a professional and positive workforce, in a respectful workplace (People)

We believe that if we focus on creating a professional and positive workforce there will be fewer temptations to be involved in unethical actions. We therefore aim to get the right people into the organisation so that they are competent and confident in fulfilling their responsibilities, and proud of the work they do. We also believe that when employees are treated fairly and feel respected, they are more inclined to give their best to the organisation and the community. We therefore aim to develop respectful personnel practices and creating a fair and supportive work environment.

3. Actively manage operational fraud and corruption and ethics risks (Processes)

Swellendam also has a strong focus on risk management which extends to risks related to fraud and corruption. We do however believe that we have a responsibility for additional over-sight and diligence in high-risk areas. Where people have discretionary power, the temptations are numerous and we must help to keep each other, and our external stakeholders, honest.

4. Ensure effective consequence management (Accountability)

We understand that we will not be able to prevent all occurrences of misconduct, fraud and corruption. Where incidents do occur, we want to ensure that we find out about it so that we can rectify the situation. We owe it to our communities to ensure that those who are guilty of committing fraud/ corruption or abuse resources and position are held accountable, and that we recover losses. We also believe that we can prevent large incidents by consistently managing discipline and acting swiftly and as soon as the need arises.

5. Work with communities and service providers (External stakeholders)

Creating an ethical culture in Swellendam is dependent on a mature, transparent and accountable partnership between the Municipality and the community. The Municipality must build trust with the community and ensure we create open and responsive communication avenues. At the same time, the morality of the Municipality is only as strong as that of the community, and we will therefore aim to partner with community organisations to promote a healthy, moral society.

3. UNPACKING AND IMPLEMENTING FRAMEWORK AND STRATEGY

We will strive to effectively implement the following strategies and plan to ensure we achieve the key objectives:

OBJECTIVES	ACTIONS
Objective 1: Set a strong ethical tone with clear standards	1.1 Clarify our values • Develop clear values statements for the Municipality • The values statement will be aligned with all relevant documents and policies of the Municipality. 1.2 Ensure that we have clear policies on ethics and anti-corruption • Review anti-fraud and corruption risk management policies, strategies and plans; • Develop integrated code of ethics document for the Municipality; • Revisit the conflict-of-interest policies, strategies and plans regularly. 1.3 Communicate the Integrity Management Policy Once the policy has been adopted by Council, a campaign will be launched to make the framework known in the Municipality. 1.4 Create awareness of ethics and anti-corruption Review and implement the ethics, risk management and anti-corruption policies, strategies and plans. 1.5 Ensure governance oversight of the implementation of the Integrity Management Framework (IMF) • Incorporate the Integrity Management Framework (IMF) in the Integrated Development Plan (IDP); • Report regularly progress to the Audit and Performance & Audit Committee (APAC); • Allocate budget to ensure the implementation of the IMF.
Objective 2: Develop a professional workforce, in a respectful workplace;	2.1 Ensure we get the right people into the organisation • Ensure fair and consistent recruitment procedures are applied; • Include reference to our values statement in recruitment adverts; • Include values-alignment as a requirement for appointment; • Implement competency assessments for directors, specialised and tactical positions; • Communicate the values and code to staff.

OBJECTIVES	ACTIONS
	2.2 Ensure we get the right people into the organisation • Develop internal capacity to facilitate interactive ethics workshops in the Municipality; • Include a significant ethics component in induction processes; • Frequent ethics workshops to management and staff; • Ethic workshops for councillors; • Training and awareness for all SCM staff on ethics, fraud and corruption. 2.3 Acknowledge when employees live our values Launch a good conduct acknowledgement initiative. 2.4 Promote professionalisation Actively encourage employees to register with recognised professional bodies. 2.5 Create a network of ethics ambassadors Identify and capacitate ethics ambassadors in the organisation.
Objective 3: Actively manage operational fraud, corruption and ethics risks	3.1 Improve risk management with regards to anti-fraud and corruption • Assess ethics risks and fraud and corruption risks as part of ongoing risk assessments; • Review mitigating strategies for key risk areas; • Implement Combined Assurance. 3.2 Ensure active detection, prevention and oversight processes Provide additional oversight through unscheduled audits (by Internal Audit or delegated department/ staff) for high-risk areas. 3.3 Improve Supply Chain Corruption risk management • Conduct due diligence on potential service providers (pre-contracting); • Maintain the 'Ethics pledge' for service providers; • Reconfirm ethical obligations in information sessions to service providers; • Publish all prescribed bid awards on the Municipality's website;

OBJECTIVES	ACTIONS
	• Maintain the 'open tender processes; • Maintain the standard "conflict of interest" statement or paragraph in the letters of appointment and contracts.
Objective 4: Ensure effective consequence management	4.1 Improve awareness of the whistle-blowing facility Communicate to internal and external stakeholders and broaden the scope where applicable. 4.2 Improve performance and consequence management Engage with / train managers to enhance instruction, information and supervision on performance and consequence management. 4.3 Establish accountability mechanisms in Council • Councils to define processes for keeping councillors accountable to the Code of Conduct; • Maintain the investigations component of the anti-fraud and corruption risk management strategy to ensure independence and oversight in investigations.
Objective 5: Work with communities and service providers	5.1 Be deliberate in engaging communities on transparency and accountable service delivery • Keep the community informed on the municipality's ethics strategy; • Improve community participation to promote transparency and accountability.

4. GOVERNANCE ARRANGEMENTS/ PROCESSES

Institutionalisation of the framework requires leadership commitment, direction and oversight. Therefore, the following governance arrangements will be put in place to implement the framework (in line with the Committee Charters):

4.1 Oversight committees

- a) Council
- b) Audit and Performance Audit Committee (APAC)
- c) Fraud and Risk Management Committee (FARMCO)
- d) Municipal Public Accounts Committee (MPAC) and other relevant oversight bodies.

4.2 Integrity Champion

- The Municipal Manager takes ultimate responsibility for driving and promoting the implementation of the framework.
- The relevant manager is delegated must assist with the Accounting Officer with the implementation of this framework.

4.3 Working Group

The working group combined with the Fraud and Risk Management Committee constituted to maintain the programme and ensure improved co-ordination and synergies to implement the framework.

4.4 Reporting and information management

The Municipal Manager must ensure that regular reports are provided to the relevant oversight committees.

5. CONCLUSION

This Framework must also be read in conjunction with other relevant legislation, regulation and policies (e.g. Code of Ethics etc.) and will be reviewed and approved by Council once every term.