



FRAUD PREVENTION PLAN

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TERMS AND ABBREVIATIONS

Throughout this document, unless otherwise stated, the words in the first column below have the meanings stated opposite them in the second column (and cognate expressions shall bear corresponding meanings):

Constitution	Constitution of the Republic of South Africa
Demarcation Act	Local Government: Municipal Demarcation Act, No 27 of 1998
DPLG	Department of Provincial and Local Government

Fraud and Corruption includes, but is not limited to, the following legal definitions:

- Fraud, i.e. the unlawful and intentional making of a misrepresentation resulting in actual or potential prejudice to another;
- Theft, i.e. the unlawful and intentional misappropriation of another's property or property which is in his/her lawful possession, with the intention to deprive the owner of its rights permanently;
- Offences in respect of *corrupt activities* as defined in the Prevention and Combating of Corrupt Activities Act, 2004, i.e.:

The general offence of corruption which could be summarised as directly or indirectly accepting or agreeing to accept any gratification from another person; giving or agreeing to give any other person any gratification in order to influence that person directly or indirectly to exercise his powers, duties or legal obligations in a manner which is/amounts to:

- Illegal, dishonest, unauthorised, incomplete, or biased;
 - Misuse or selling of information or material acquired;
 - Abuse of position of authority;
 - Breach of trust;
 - Violation of a legal duty or set of rules;
 - Designed to achieve an unjustified result; and
 - Any other unauthorised or improper inducement to do or not to do anything;
-

Corrupt activities in relation to:

- Public officials;
- Foreign public officials;
- Agents;
- Judicial officers;
- Members of the prosecuting authority;
- Unauthorised gratification received or offered by or to a party with an employment relationship;
- Witnesses and evidential material during certain proceedings;
- Contracts;
- Procuring and withdrawal of tenders;
- Auctions;
- Sporting events; and
- Gambling games or games of chance;
- Conflicts of interests and other unacceptable conduct, e.g.:

Acquisition of private interests in contract, agreement in or investment in public body;
Unacceptable conduct relating to witnesses; and
Intentional interference with, hindering or obstruction of investigation of offence.

Other offences relating to corrupt activities, viz:

- Accessory to or after an offence;
- Attempt, conspiracy and inducing another person to commit offence; and
- Failure to report corrupt transactions;

Irregularities relating to the following:

Systems issues: where a process/system exists, which is prone to abuse by employees, the public or other stakeholders, e.g.:

System	Issues is prone to abuse by employees
HR	Inadequate vetting of employees False qualifications Abuse of sick leave
Procurement	Non-compliance to tender procedures Procurement fraud, e.g. collusion between employees and suppliers Fraudulent information submitted by suppliers when tendering for work
Housing	Manipulation of the beneficiary waiting list Irregular allocation of a housing subsidy
Financial Systems and Control	Theft of blank cheques Deliberate non-compliance to policies and procedures Abuse of the system of overtime Abuse of the system of travel claims Fraudulent payment certificates submitted for payment Non-compliance to delegated authority limits

Financial issues: i.e. where individuals or entities have fraudulently obtained money from Senqu, e.g.:

Financial Issues	Fraudulent activity
HR	Ghost employees Irregular appointment of staff for undue benefits
Procurement	Suppliers invoicing for work not done; Contractors “fronting
Housing	Diversion of rental payments on rental stock
Financial Systems and Control	Theft, e.g. petty cash, etc. Fraudulent cashing of cheques Fraudulent travel claims by employees

Equipment and resource issues: i.e. where the Senqu's equipment is utilised for personal benefit or stolen, e.g.:

Financial Systems and Control:

- Theft of assets;
- Abuse of assets;
- Deliberate or negligent destruction of property; and
- Use of the Senqu's resources and equipment for private gain.

Other issues: i.e. activities undertaken by employees of Senqu, which may be against policies or fall below established ethical standards, e.g.:

- Conflict of interest;
- Favouritism; and
- Non-disclosure of private work and non-disclosure of financial and other interests in private business and companies.

Term	Meaning
LGAS	Local Government Anti-Corruption Strategy
MFMA	Local Government: Municipal Finance Management Act, No.56 of 2003
Municipal Manager	A person appointed in terms of section 82 (1) of the Structures Act
Senqu	Senqu Local Municipality
Plan	Fraud Prevention Plan for Senqu Local Municipality
R.S. A	Republic of South Africa
SALGA	South African Local Government Association
SAPS	South African Police Services
SARS	South African Revenue Services
Structures Act	Local Government: Municipal Structures Act, No 117 of 1998
Systems Act	Local Government: Municipal Systems Act 32, No of 2000

SECTION I:

1.1 Introduction

Senqu subscribes to the principles of good corporate governance, which requires the conducting business in an honest and transparent manner. Consequently, Senqu is committed to fighting fraudulent behaviour at all levels within the organisation.

The Plan is premised on the organisations core ethical values driving the business of Senqu, the development of its systems, policies and procedures, interactions with ratepayers, the public and other stakeholders, and even decision-making by individual managers representing the organization. This means that in practice all departments and other business units of Senqu and even external stakeholders must be guided by the Plan as the point of reference for their conduct in relation to Senqu.

In addition to promoting ethical conduct within Senqu, the Plan is also intended to assist in preventing, detecting, investigating and sanctioning fraud and corruption.

This dynamic document details the steps, which have been, and will continually be taken by Senqu to promote ethical conduct and address fraud and corruption.

1.2 Policy Stance

The policy of Senqu is **Zero tolerance** to fraud and corruption. In addition, all fraud and corruption will be investigated and followed up by the application of all remedies available within the full extent of the law and the implementation of appropriate prevention and detection controls. These prevention controls include the existing financial and other controls and checking mechanisms as prescribed in the systems, policies and procedures of Senqu.

The efficient application of instructions contained in the policies and procedures of Senqu, is one of the most important duties to be applied by every employee in the execution of their daily tasks.

1.3 What should an employee do if he/she suspects fraud and corruption?

- It is the responsibility of all employees to immediately report all allegations or incidents of fraud and corruption to their immediate manager.
-

Should an employee be concerned that the manager is involved; the report can be made to any other member of management, the Municipal Manager and/or the Chairperson of the Audit Committee.

- All managers are responsible for the detection, prevention and investigation of fraud and corruption must report all incidents and allegations of fraud and corruption to the Municipal Manager. The Municipal Manager will initiate an investigation into the matter.
- Should employees wish to report allegations of fraud and corruption anonymously, they can contact the following numbers:

*The Municipal Manager and Mayor at 051 603 1301
The Chairperson of the Audit Committee at 076 379 7300
National Hotline at 0800 701 701*

1.4 What should a member of the public or providers of goods and/or services do if they suspect fraud and corruption?

Senqu encourages members of the public or providers of goods and/or services who suspect fraud and corruption to contact the following number:

*The Municipal Manager and Mayor at 051 603 1301
The Chairperson of the Audit Committee at 076 379 7300
National Hotline at 0800 701 701*

1.5 How will allegations of fraud and corruption be dealt with?

For issues raised by employees, ratepayers, members of the public or providers of goods and/or services, the action taken will depend on the nature of the concern. The matters raised will be screened and evaluated and may subsequently:

- Be investigated internally; or
- Be referred to another law enforcement agency.

Any fraud and corruption committed by an employee or any other person will be pursued by thorough investigation and to the full extent of the law, including (where appropriate) consideration of:

- a) In case of employees, taking disciplinary action within a reasonable period of time after the incident;
- b) Instituting civil action to recover losses;
- c) Initiating criminal prosecution by reporting the matter to the SAPS or any other relevant law enforcement agency; and
- d) Any other appropriate and legal remedy available.

1.6 Recovery of losses

Managers are required to ensure that losses or damages suffered by Senqu as a result of all reported acts committed or omitted by an employee, ratepayer or any other person are recovered from such an employee, ratepayer or other person if he or she is found to be liable for such losses.

1.7 Feedback to reporters of fraud

The Municipal Manager will, upon receiving a report of fraud from an external person write to the person making the report: Acknowledging that the concern has been received; Indicating how he proposes to deal with the matter and whether any initial enquiries have been made; Giving an estimate of how long it will take to provide a finale response; and Informing them whether any further investigations will take place, and if not, why not.

1.8 Confidentiality

All information relating to fraud and corruption that is received and investigated will be treated confidentially. The progression of investigations will be handled in a confidential manner and will not be disclosed or discussed with any person(s) other than those who have a legitimate right to such information. This is important in order to avoid harming the reputations of suspected persons who are subsequently found innocent of wrongful conduct.

1.9 Media

No person is authorized to supply any information with regard to allegations or incidents of fraud and corruption to the media without the express permission of the Municipal Manager.

1.10 Protection of Whistle Blowers

An employee who reports suspected fraud and/or corruption may remain anonymous should he/she so desire. Concerns expressed anonymously are difficult to investigate; nevertheless, they will be followed up at the discretion of Senqu. This discretion will be applied by taking into account the following:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation.

No person will suffer any penalty or retribution for good faith reporting of any suspected or actual incident of fraud and corruption which occurred within Senqu. This may include

- **Harassment or victimisation:** Senqu acknowledges the fact that the decision to report a concern can be a difficult one to make, not least because of fear of reprisal from those responsible for the irregularity. Senqu will not tolerate harassment or victimization and will take action to protect employees when they raise a concern in good faith. This does not mean that if an employee is already the subject of disciplinary or other action, that action will be halted as a result of their whistle blowing.
- **Confidentiality:** Senqu will do its best to protect an individual's identity when he/she raises a concern and does not want their identity to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the employee may be required as part of the evidence.

No employee making a disclosure to be subjected to any occupational detriment by his or her employer as per Protected Disclosure Act 26 of 2000 section 3

1.11 Remedies

Any employee who has been subjected, is subject or may be subjected, to an occupational detriment in breach of section 3 may:

Approach any court having jurisdiction, including the labour court established by section 151 of the Labour Relations Act 1995 (Act 66 of 1995) for appropriate relief or Pursue any other process allowed or prescribed by any law.

All managers should discourage employees or other persons from making allegations, which are false and made with malicious intentions. Where such allegations are

discovered, the person who made the allegations must be subjected to firm disciplinary, or other appropriate action.

Section II:

2.1 Components of the Plan

The main principles upon which the plan of Senqu, that is based on and aligned to the LGACS, includes the following:

- Creating a culture which is ethical and intolerant to fraud and Corruption;
- Deterrence of fraud and corruption
- Preventing fraud and corruption which cannot be deterred;
- Detection of fraud and corruption;
- Investigating detected fraud and corruption;
- Taking appropriate action in the event of such irregularities, e.g. disciplinary action, recovery of losses, prosecution, etcetera; and
- Applying sanctions, that includes blacklisting and prohibition from further employment.

The above is not intended to detract from the premise that all the components are equally essential for the successful implementation of the Plan. The components of the plan for Senqu are the following:

- Focus on the Organisation
 - Focus on Employees
 - Focus on other stakeholders
 - Enforcement
 - Implementation
-

Section III:

3.1 Approach to Fraud Prevention

The approach to fraud prevention in Senqu can be summarized as follows:

- Organisation focus
- Focus on employees including management
- Focus on stakeholders
- Enforcement
- Implementing



3.2 Organisation Focus

Codes of Conduct for Municipal Employees and Councillors

In terms of [Schedule 7 \(8\) of the Local Government: Municipal Structures Amendment Act, 2021](#), the [Code of Conduct for Municipal Employees](#) contains specific conduct standards categorized as follows:

- General Conduct
 - Commitment to serving the public interest
 - Personal gain
 - Disclosure of benefits;
 - Unauthorised disclosure of information;
 - Undue influence
-

- Rewards, gifts and favours;
- Council property;
- Payment of arrears;
- Participation in elections;
- Sexual harassment;
- Reporting duty of staff members; and
- Breaches of Code

In terms of [Schedule 7 \(8\) of the Local Government: Municipal Structures Amendment Act, 2021](#), the code of Conduct for Councillors contains the following categories:

- General conduct of councilors;
- Attendance at meetings;
- Disclosure of interest;
- Personal gain;
- Declaration of interest;
- Full-time councilors;
- Rewards, gifts and favours
- Unauthorised disclosure of information;
- Intervention in administration;
- Council property;
- Duty of chairpersons of municipal councils
- Breaches of Code; and
- Application of Code to traditional leaders

[A Gift Register is developed and updated to ensure that both the acceptance and offering of business courtesies, including gifts, by all employees of Senqu occurs only within the ethical standards as prescribed by Senqu.](#)

The development of a robust system for the declaration of private business interests and actual or potential conflicts of interest by all employees and keeping of a centralized record thereof must be developed.

3.3 Systems, Policies and Procedures

Senqu has a number of systems, policies and procedures designed to ensure compliance with specific laws and regulations and basic internal control.

All employees and other stakeholders are expected to comply with the applicable policies and procedures. A fundamental risk in this area is the lack of knowledge, awareness, effective communication and training relating to prevailing systems, policies and procedures.

Non-compliance with policies and procedures is a risk with the potential to seriously impact the success of the Plan of Senqu. This will be addressed by developing clearly defined communication and training strategies to create awareness of all policies and procedures in order to ensure that all employees are made aware of, and adequately

trained in the implementation of policies and procedures relevant to their duties and responsibilities, e.g. provisions for all employees to acknowledge, in writing, that they have read the policies and procedures applicable to their duties, have undergone relevant training and/or are aware of these policies and procedures, etc.

A structured monitoring mechanism will be developed for the keeping of proper records of the policies and procedures that are being updated, and of new policies and procedures that are being developed in order to set clear targets and monitor progress.

3.4 Human Resources-Employment Practices

Senqu is committed to developing human resources systems, policies and procedures, which incorporate fraud and corruption prevention practices. There is a risk of poor implementation of its human resource systems, policies and procedures and Senqu undertakes testing thereof during internal audits in which control shortcomings are subsequently addressed.

Employee focused anti-fraud and anti-corruption measures should be visible from the point of advertising a vacant post, recruitment, specific employment conditions, maintaining high employee morale, performance management and even exit procedures upon resignation or retirement. The approaches indicated below are key to Senqu`s efforts in this regard.

Advertising posts: The inclusion of specific provisions when advertising posts to provide an indication to applicants that only people with the highest levels of personal integrity will

be considered and that submission to appropriate pre-employment screening processes are obligatory for consideration in any post.

Pre-employment screening and probity: Senqu intends ensuring that pre-employment screening procedures are applicable to all employees, regardless of level, including employees acting in specific positions, seconded employees and temporary and contract workers. Relevant probity will be included in all employee screening processes.

Probation: Compulsory probationary periods should be applicable to all full-time employees. This provision will be extended to include seconded employees and temporary and contract workers. Relevant vetting will again be considered for employees on probation, during probation and prior to their final appointment in view of the long duration of the probationary period.

Ongoing financial disclosure and lifestyle audits: Senior managers will be obliged to declare specific personal assets and private business interests.

Employee induction programmes: Employee induction is an opportunity to introduce employees to the culture and ethos of the organisation. Efforts will be made to ensure that organization strategy, business ethics and conduct standards are included in employee induction. Specific steps will also be developed to include seconded employees, interns and temporary and contract workers in relevant aspects of induction programmes.

Obligatory leave periods: In order to limit the risk of over-worked employees who could become lackadaisical leading to non-compliance to internal control and to further limit the risk of fraud and corruption Senqu will compel all employees to take annual leave. This control also limits the risk of unethical individuals monopolizing specific tasks.

Managers will be encouraged to ensure that appropriate controls, e.g. appropriate scrutiny and supervision, are put in place in instances where employees do not take leave extended periods of time due to work commitments.

Exit procedures for employees and control over assets: The exit procedures for employees leaving Senqu usually require the return of asset and an exit interview. Steps will be taken to ensure that specific follow-up time frames are set to encourage managers to apply the requirement related to the return of assets more promptly.

Senqu will ensure that an exit interview process is in place which includes the assessment of the perceptions of the business ethics and conduct standards within the organisation. This will assist in identifying areas for improvement.

3.5 Discipline

Senqu will be consistent and efficient in its application of the disciplinary measures. Additional measures, which will be considered include:

- Communication of specific disciplinary standards and forbidden conduct;
- Introducing a system where the application of disciplinary measures is applied consistently;
- Steps for ongoing training of managers in the application of disciplinary measures;
- Where managers are found to be inconsistent and/or inefficient in the application of discipline, Senqu will consider firm action; and
- Publication (within the permissible legal framework) of the outcomes and sanctions of disciplinary actions, including lessons learned. The successful achievement of these initiatives, together with their communication is expected to have a deterrent effect.

3.6 Financial System and Control

Appropriate finance policies and procedures are also necessary to ensure appropriate internal control over finance management and to limit fraud and corruption risks. The effectiveness of the existing finance policies and procedures will also be tested during the course of internal audits and shortcomings are addressed.

The Council of Senqu must approve an annual budget for Senqu before the start of the financial year. Senqu may only incur expenditure in terms of an approved budget and within limits of the amounts appropriated for the different votes in an approved budget.

The Municipal Manager of Senqu is regarded as the accounting officer for Senqu. Therefore the Municipal Manager should ensure that the financial systems and controls that are in place in Senqu address the following: Effective, efficient and economic use of resources; Proper record keeping of the financial affairs of Senqu; Effective, efficient and transparent systems of financial and risk management and internal control; Effective, efficient and transparent systems of internal audit; Prevention of irregular or fruitless and wasteful expenditure; and Institution of disciplinary or, when appropriate, criminal

proceedings against employees who have committed an act of financial misconduct or other offence including fraud and corruption.

Further, the Municipal Manager must ensure that an effective system of expenditure control is in place. According to the MFMA, the accounting officer of Senqu must report to the South African Police Service all cases of alleged theft and fraud that occurred in Senqu

Top management, senior management and other officials of Senqu must assist the municipal manager in coordinating the financial systems and controls within Senqu

The finance policies procedures and other prescripts of Senqu prescribe various controls, which, if effectively implemented, would limit fraud and corruption within Senqu.

These controls may be categorized as follows, it being recognized that the categories contain overlapping elements:

Prevention controls, which is further subdivided into:

- i. Authorisation Controls which require that all transactions must be authorized or approved by an appropriate responsible person and that limits for these authorizations are specified in the delegations of authority of Senqu.
- ii. Physical Controls which are concerned mainly with the custody of assets and involve procedures and security measures designed to ensure that access to assets is limited to authorized personnel.

Detection controls, which is further subdivided into:

- i. Arithmetic and accounting controls, which are basics controls within the recording function which ensure that transactions to be recorded and processed have been authorised, are complete, are correctly recorded and accurately processed. Such controls include checking arithmetical accuracy of records, the maintenance and checking of totals, reconciliation, control accounts, and accounting for documents.
 - ii. Physical controls, which relate to the security of records and are similar to preventive controls in that they are also designed to limit access.
 - iii. Supervision, which relates to supervision by responsible officials of day to day transactions and thereof.
-

- iv. Management information which relates to the review of management accounts and budgetary controls. These controls are normally exercised by management outside the day to day routine of the system.

Segregation of duties

- i. One of the primary means of control is the separation of those responsibilities or duties that would, if combined, enable one individual to record and process a complete transaction, thereby providing him/her with the opportunity to manipulate the transaction irregularly and commit fraud and corruption.
- ii. Segregation of duties reduces the risk of intentional manipulation or error and increases the element of checking.
- iii. Functions that should be separated include those of authorisation, execution, custody, recording, and in the case of computer-based accounting systems, systems development and daily operations.
- iv. Placed in context with fraud and corruption prevention, segregation of duties lies in separating either the authorisation or the custodial function from the checking function.

Despite the existence of policies and procedures to address internal control, deficiencies such as ineffective application of policies and procedures resulting from lack of training expertise, knowledge and capacity has the potential to lead to increased incidence of fraud and corruption.

Senqu will continue to initiate steps to address the problem of lack of training, expertise and knowledge in systems, policies and procedures to improve internal control. Areas of weakness will be identified during audits and risk assessments.

Furthermore, Senqu will also continue to re-emphasise to all supervision that consistent compliance by all employees with internal control is one of the fundamental controls in place to prevent fraud and corruption. Managers will be encouraged to recognize that internal control shortcomings identified during the course of audits are, in many instances, purely symptoms and that they should strive to identify and address the causes of these internal control weaknesses, in addition to addressing the control weaknesses.

Where managers do not comply with basic internal controls, e.g. non-adherence to the delegation of authority limits, firm action(s) will be considered.

3.7 Procurement

The MFMA requires every municipality to have a procurement policy that is fair equitable, transparent, competitive and cost effective.

Further, the MFMA stipulates that the procurement policy of Senqu must at least address the following aspects:

- The barring of persons from participating in tendering or other bidding processes that have:
 - Been convicted of fraud or corruption during the past five years;
 - Willfully neglected, reneged on or failed to comply with government contract during the past five years; and
 - Whose tax matters are not cleared by SARS

The Municipal Manager of Senqu must implement the procurement policy and take all responsible steps to ensure that proper mechanism and separation of duties in the procurement system are in place to minimize the risk of fraud, corruption, favouritism and unfair and irregular practices.

At a minimum, the procurement policy of Senqu should contain the following antifraud and anti-corruption provisions:

- The range of supply chain management processes that Senqu may use, e.g. tenders, quotations, etc.
- When a particular process must be used;
- Procedures for each type of process;
- Open and transparent pre-qualification processes for tenders and other bids
- Competitive bidding processes;
- Bid documentation, advertising of and invitations for contracts;

Procedures for:

- The opening, registering and recording of bids in the presence of interested parties;
 - The evaluation of bids;
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- Negotiating the final terms of the contracts;
- And the approval of bids;
- Screening processes and security clearances for prospective contractors on tenders or other bids above a prescribed value;
- Compulsory disclosure of conflicts of interests;

The barring of persons from participating in tendering or other bidding processes who have:

- Been convicted of fraud or corruption during the past five years;
- Willfully neglected, reneged on or failed to comply with a government contract during the past five years; and
- Tax matters that are not cleared with SARS;

Any additional measure for: Combating fraud, corruption, favoritism and unfair and irregular practices in Senqu`s supply chain management; and

Promoting ethics of officials and other role players involved in Senqu`s supply chain management

3.8 Housing

In order to fulfill its housing role, Senqu must carry out the following functions:

- Health and Safety: ensure that conditions not conducive to health and safety of the inhabitants of its areas of jurisdiction are prevented or removed;
 - Efficient Services: ensure that services in respect of water, sanitation, electricity, roads, storm water drainage and transport are provided in a manner that is economically efficient;
 - Housing Delivery Goals: set housing delivery goals in respect of its area of jurisdiction;
 - Land for Housing: identify and designate land for housing development;
 - Public Environment: create and maintain a public environment conducive to housing development process;
 - Bulk and Revenue Generating Services: provide bulk engineering services, and revenue generating services in so far as specialist utility suppliers do not provide such services;
 - Land Use: plan and manage land use and development; and
-

- Housing Development: initiate, plan, co-ordinate, facilitate, promote and enable appropriate housing development in its area of jurisdiction.

3.9 Housing Subsidy

A housing subsidy is a grant by Government offered to qualifying beneficiaries for housing purposes. The grant is not paid in cash to the beneficiaries. The grant is paid to a seller or may be used to construct a house, which is then transferred to a beneficiary.

- Applications for housing subsidy must satisfy the following criteria:
 - An applicant must be married or be living together with any other person. A single person with proven financial dependents (such as children or family members) may also apply;
 - An applicant must be a citizen of the Republic of South Africa, or be in the possession
 - of a permanent resident permit;
 - An applicant must be legally competent to contract (i.e. over 21 years of age, or married or divorced) and of sound mind;
 - An applicant's gross monthly household must not exceed R3500. Adequate proof of income must be submitted;
 - An applicant or anyone else in the household must not have received previous housing benefits from Government. Except in the following:
 - An applicant that qualifies for a Consolidation subsidy; or
- Disabled persons who:
 - Own a vacant stand that was obtained through the Land Restitution Programme;
 - Have acquired a residential property for the first time without Government assistance and the house/dwelling on the property, if any, does not comply with the Norms and Standard in respect of permanent Residential structures. The property must be in possession and registered in the name of the applicant; and
 - Qualify for a consolidation subsidy

Applications for a housing subsidy may be made at either the relevant Provincial Housing Department or at the offices of Senqu.

Where applications are received by Senqu, receipt of the following documents should be ensured in order to mitigate the risk of beneficiaries irregularly a housing subsidy:

- A certified copy of the following:
 - The page of the bar-coded R.S.A identity document containing photograph of applicant and that of his/her spouse;
 - The page of the bar-coded permanent residence permit containing the photograph of the applicant and that of his/her spouse where the applicant is not a south African Resident;
 - A marriage certificate (if applicable)
 - A spouse death certificate (if applicable)
 - A divorce decree (if applicable)
 - Birth certificates of all dependents (if applicable) and
 - Most recent pay slip (applicant and spouse)

- Agreement of Sale
- Building Contract and Approved Building Plan;
- Sale of Land and House Building Support agreement in respect of People`s housing
- Process(PHP) (if applicable);
- Proof of Disability (where applicable);
- Proof of loan granted by lender (if applicable) and
- Application for exemption for capital contribution (if applicable).

3.10 Rental Stock

Rental Stock: Senqu currently owns housing rental stock. Qualifying tenants of state financed rented family housing units may buy them at a discount to a maximum of R7 500 on the selling price. If the selling price is R7 500 or less, the discount benefit is limited to the lesser amount and the sales debtor is able to acquire the unit without making a further capital contribution. If selling price exceeds R7 500, the purchaser will be required to pay the excess.

The following categories of people qualify to secure rental stock with discount:

- Existing tenants in the housing unit as at 15 March 1994; or
 - Existing purchasers of the rental stock.
-

Applications for the discounted benefit as well as the purchase of the rental stock from Senqu must be made directly to Senqu. When reviewing and approving these applications, Senqu must ensure that the applicant is an existing tenant in the housing unit as at 15 March 1994 or the applicant is an existing purchaser of the rental stock. This is done in order to mitigate the risk of fraudulent allocation of the discount benefit.

3.11 Housing Allocation

Housing allocation: Senqu facilitates the allocation of house built by Provincial and National Government.

Further, Senqu facilitates communication with communities through three different structures, e.g. ward committees, etc. Beneficiaries on the waiting list for housing may be captured by Senqu or the Provincial Government. A fundamental risk in the allocation of houses is that housing may be irregularly allocated to beneficiaries, e.g. beneficiaries may be moved up the waiting list in exchange for undue benefit.

Senqu will develop a housing policy that, at a minimum, will address the anti-fraud and anti-corruption provisions referred to in paragraph 3.30 and 3.33 above.

3.12 Risk Management and Assessment

In order to identify and address risks facing Senqu, a risk assessment will be performed on quarterly basis. This process will be complimented by the specific identification of existing controls to mitigate risks identified Presentations to employees of Senqu will be conducted in order to ensure that they have a more detailed understanding of the fraud and corruption risks facing Senqu and the areas wherein these risks exist, thus enhancing the prospect of detecting irregularities earlier.

3.13 Fraud Detection Reviews

Senqu will perform specific detection reviews in areas, which are at high risk of unethical conduct, fraud and corruption on an annual basis. This will include the conducting of presentations to employees, including managers to ensure that they have a more detailed understanding of the risks associated with these areas, thus also enhancing the prospect of detecting irregularities earlier. These include:

- Recruitment of staff;
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- Procurement, e.g. emergency procurement, sole suppliers, etc.
- Housing, e.g. allocation, administration of housing waiting lists, etc.; and
- Financial Systems and Control, e.g. payment of suppliers, receipt and banking of revenue received.

3.14 Internal and External Audit

The MFMA stipulates that a Municipality must maintain a system of internal audit under the control and direction of an audit committee. Furthermore, the internal audit function of Senqu is required to report on matters relating to:

- Internal Control;
- Accounting procedures and practices;
- Risk and risk management;
- Loss control; and
- Compliance with applicable legislation.

Senqu will create or outsource an Internal Audit Unit, which will include anti-corruption capacity under the guidance of an Audit Committee. In terms of its Charter, the primary role of the Audit Committee will be to:

- Evaluate the performance of internal audit;
- Review the internal audit function`s compliance with its mandate as approved by the Audit Committee;
- Review and approve the internal audit charter, internal audit plans and internal audit`s conclusions with regard to internal control;
- Review significant differences of opinion between management and internal audit function
- Evaluate the independence and effectiveness of internal auditors; and
- Review the co-operation and co-ordination between the internal and external audit function and co-coordinating the formal internal audit work plans with external auditors to avoid duplication of work.

The anti-corruption capacity within Senqu will be responsible for the investigation of allegations of fraud and corruption that is brought to its attention. Additionally, it will support the risk management procedures from a fraud risk identification perspective.

Senqu recognizes the fact that the positive support by all its managers for Internal Audit and its functions, speedy response to, and the addressing of queries raised by Internal Audit is vital to the success of the plan. Where managers are found to be slow in addressing internal control and shortcomings raised by Internal Audit, firm action will be considered.

Awareness strategies will also be developed to enhance managers` understanding of the role of internal Audit.

Senqu is also the subject of annual external audits. These audits include the following tasks:

- Examining evidence supporting the amounts and disclosures in the financial statements;
- Assessing the accounting principles used and significant estimates made by management; and
- Evaluating the overall financial statement presentation.

3.15 Physical and Information Security

3.15.1 Physical security

Senqu`s main physical security threat arises in the area of control over its physical assets, facilities and employees, Security personnel and access systems should continuously be reviewed for adequacy.

Senqu will also consider conducting a regular detailed review of the physical security arrangements at its offices and other sites and improve weaknesses identified. Specific focus areas will be physical security over infrastructure, assets and staff

Furthermore, Senqu will continue to pursue steps to ensure adequate security over its people, confidential information and information systems.

3.15.2 Information Security

Senqu will ensure that all employees are sensitized on a regular basis to the fraud and corruption risks associated with information security and the utilization of computer resources, in particular-access control, and ensure that systems are developed to limit the risk of manipulation of computerized data.

Communiqués will be provided to all employees on the management of intellectual property and confidential information to limit the risk of manipulation of information.

Regular communiqués will be forwarded to employees pointing out security policies, with a particular emphasis on e-mail and internet usage and the implications (e.g. disciplinary action) of abusing these and other computer related facilities. Where employees are found to have infringed on prevailing policy in this regard, disciplinary action will be taken.

Regular reviews of information and computer security will also be considered weaknesses identified during these reviews will be addressed

3.16 Focus on Employees

Key ambassadors for the successful implementation of the Plan for Senqu are its employees.

In essence; this means that their conduct often forms the base upon which Senqu as an organization is judged.

Senqu employees have to therefore demonstrate behavior beyond reproach in the execution of their duties.

3.17 Focus on other Stakeholders

Senqu has several other stakeholders with whom it interacts. These are indicated below:

- Trading partners, e.g. suppliers, contractors, consultants
- Employee representative organizations;
- DPLG;
- SALGA; and
- The general public

All stakeholders with whom Senqu interacts are expected to abide by the principles contained in the plan. Although Senqu has limited legal rights to enforce these principles on external stakeholders, it can exercise moral persuasion too gain compliance to the stakeholders who do not comply.

3.18 Trading Partners

It is a common perception that employees face the greatest challenge to their integrity in the form of enticement to accept bribes from unethical suppliers, contractors and consultants. Furthermore, these trading partners are also often viewed as untrustworthy in delivery of goods and /or services.

Approaches to address the risk of fraud and corruption relating to trading partners are the following:

- Appropriate terms and conditions in invitations to propose for services relating to the standards of business ethics expected by Senqu;
- Appropriate pre-award screening of credentials supplied by contractors;
- Provisions for the compulsory declaration of actual and /or potential conflicts of interest both by suppliers and employees of Senqu dealing with these suppliers;
- Appropriate contract terms and conditions indicating the conduct expected by Senqu;
- Ongoing communication of these standards;
- Sound project management;
- Monitoring and evaluation of breaches;
- Taking sound action in the event of breaches such as:
 - Prosecution;
 - Loss recovery; and
 - Placing of appropriate on future contracts and cancellation of existing contracts.

3.19 Employee Representative Organisations

Senqu is committed to complying with the resolutions of recognition agreements with trade unions. Nonetheless; it is also expected of trade union representative to comply with the principles of the plan of Senqu. Trade unions will also be consulted prior to the finalization of the plan.

3.20 Department of Provincial and Local Government

DPLG is a national department and its primary function is to develop policies and legislation with regard to provinces and local government, and to monitor the implementation of the Municipal Structures Act, Municipal Demarcation Act, Systems Act

as well as the MFMA. Efforts will be made to ensure that these stakeholders is also made aware of the principles contained in the Plan and the conduct encouraged by Senqu.

3.21 SALGA

SALGA is an organization mandated by the South Africa constitution to assist in the transformation of local Government in South Africa. SALGA plays a core role in areas related to local government transformation and as a national representative of the local government sector and its employees. Senqu will also ensure that SALGA is made aware of the Plan and appropriately compliment it when dealing with Senqu.

3.22 The General Public

Members of the general public will also be made aware of Senqu`s commitment to fraud prevention and encouraged, through awareness programmes, to report irregularities affecting Senqu.

3.23 Enforcement

No Fraud Prevention Plan would be complete without enforcement forming an integral component for instances where fraud and corruption occur.

3.24 Reporting and Monitoring of fraud and corruption

3.24.1 Reporting Channels

The reporting channels for unethical conduct, fraud and corruption impacting Senqu are the following:

- All allegations of fraud and corruption should be reported by employees to their immediate
 - managers;
 - If there is a concern that the immediate manager is involved, the report must be made to any other member of management, the Municipal Manager and /or the Chairperson of the Audit Committee;
 - All managers should report all allegations to the Municipal Manager who will initiate an investigation; and
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- Should an employee wish to make a report anonymously, such a report may be made to any member of management, the Municipal Manager, the Chairperson of the Audit Committee and /or the Mayor.
- The reporting individual should be informed of the following:
 - Not to contact the suspected individual in an effort to determine facts or demand restitution.
 - Not to discuss the case, facts, suspicious, or allegations with any-one unless specifically asked to do so.

Parallel to the above enforcement approaches is the task of fixing of controls to limit future recurrence of fraud and corruption in the event of breaches.

3.25 Implementation and Awareness

The Plan will be reviewed on an annual basis, whilst progress with the implementation of the various components will be reviewed on a quarterly basis. In the latter regard, specific priorities stemming from the Plan, actions to be taken, responsible persons and feedback dates relating to progress made will also be set.

3.26 Monitoring

Senqu will ensure that a fraud and corruption information system is developed for the following purposes:

1. Recording all allegations;
2. Tracking progress with the management of allegations;
3. To facilitate the early identification of systemic weaknesses/risks; and
4. Provide feedback to employees and other whistle blowers on the management of allegations.

3.27 Creating Awareness

This component of the plan comprises two areas, namely education and communication

3.27.1 Education

Formal awareness presentations will be conducted for employees of Senqu in planned workshops. The ongoing creating of awareness amongst all employees is, however, the responsibility of all managers. Approaches to create awareness amongst employees will address the following issues:

- Employee awareness and the application of professional ethics in their work environment;
- Employee awareness of the current systems, policies and procedures relating fraud and corruption and their rights should they blow the whistle;
- Encouraging employees to blow the whistle on fraud and corruption within their work environments; and
- Encouraging employees to understand specific fraud and corruption related risks to which Senqu may be exposed, thus enhancing the prospect of detecting irregularities earlier.

3.27.2 Communication

The objective of communication is to further create awareness amongst employees, the public and other stakeholders, of the Plan in order to facilitate a culture where all stakeholders strive to contribute towards making it a success. This will increase the prospect of fraud and corruption being reported and improve Senqu`s prevention and detection ability.

Communication approaches that will be considered by Senqu are the following:

- An official launch for the Plan aimed at all stakeholders;
 - Posters, newsletters and pamphlets to advertise the Codes of Conduct for staff members and Councillors, aimed at employees, the public and other stakeholders;
 - A suggestion box for employees and other stakeholders to make submissions which could enhance the further development of the Plan;
 - Ensuring employee induction programmes: Employee induction programme is an opportunity to introduce employees to the culture and ethics of the municipality. Efforts will be made to ensure that organisation strategy, business ethics and conduct standards are included in employee induction.
 - Exit procedures for employees and control over assets: The exit procedures for employees leaving the municipality usually require the return of assets and an exit interview. Steps will be taken to ensure that managers do apply the required controls to the return of assets.
 - Signing of declarations of commitment by all employees to the Plan
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- Endorsements of other correspondence directed at providers of goods and/or services with pro-ethics and anti-fraud and anti-corruption messages; and
- Screensavers on computers with appropriate pro-ethics and anti-fraud and corruption messages; and
- Publishing the Plan and successes in its implementation in the Annual Report of Senqu.

3.28 Implementation structure

Senqu will consider the establishment of a fraud Prevention Committee whose responsibility will include the implementation of the Plan. This Committee will include champions from all faculties and other business units. The terms of reference of this team will include the following in relation to the Plan:

- Securing buy-in from all stakeholders;
- Information sharing;
- Ongoing identification of weaknesses in systems and solutions;
- Creating awareness and ensuring adequate training and education to promote the Plan; and
- Assessing progress and ongoing maintenance and review

4. Approval of the Policy

MUNICIPAL MANAGER

DATE