



**JOHANNESBURG
MATTERS** FIXING
SOUTH AFRICA'S
GROWTH ENGINE

5

Time for Action –

Corruption in Joburg



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The Centre for Development and Enterprise (CDE) is an independent policy research and advocacy organisation. It is South Africa's leading development think tank, focusing on critical development issues and their relationship to economic growth and democratic consolidation. Through examining South African realities and international experience, coupled with high-level forums, workshops and roundtables, CDE formulates practical policy proposals outlining ways in which South Africa can tackle major social and economic challenges. CDE has a special focus on the role of business and markets in development.

Johannesburg Matters: Fixing South Africa's Growth Engine

Series editor: Ann Bernstein

Reports in the **Johannesburg Matters** series are based on commissioned research, intensive internal research and wide-ranging consultations with experts and stakeholders. This document and the other reports in the series are available from CDE and can be downloaded from www.cde.org.za.

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Johannesburg Matters: Fixing South Africa's growth engine is a new series of reports from CDE, based on a large research programme into the major challenges confronting the City.

Johannesburg's future depends on the forthcoming local government election delivering a metro government committed to rebuilding a city crippled by maladministration, corruption and a fiscal crisis. After nine mayors in ten years, the City needs effective leadership and stable management.

South Africa needs Johannesburg to once more become an inviting place in which to live and do business and expand opportunities for a growing population. A national economic, social and political recovery needs a prosperous Johannesburg powering growth, investment and employment in the country and on the continent.

The **Johannesburg Matters** series will provide analysis and recommendations that a new City political leadership and reformed administration could implement after the elections as they commence the difficult job of rebuilding South Africa's most important urban centre. They cannot do this alone – success will require partnerships within and beyond the city.

CDE is an independent think tank; we are not involved in party politics. We are a national resource, committed to building a prosperous democracy with expanding opportunities for everyone. Our research and recommendations are public and available to all. Our interest is in the city's future and its contribution to national economic growth and development.

This is the **fifth report** in the series.

Time for Action – Corruption in Joburg

Introduction

The diagnosis in *Joburglary: Assessing the Crime-Council Ecosystem in the City of Johannesburg*, is stark. The report - commissioned by CDE from the Global Initiative Against Transnational Organized Crime (GI-TOC) as part of our **Johannesburg Matters** series – paints a deeply disturbing picture. It shows that Johannesburg is not suffering only from weak administration, poor maintenance or ordinary municipal incompetence. It has developed what the report describes as a powerful “crime-council ecosystem” in which political, business and criminal interests intersect around the machinery of local government and benefit from its dysfunctionality.

Municipal budgets, procurement systems, appointments and service-delivery functions create valuable opportunities for extraction. To exploit these, politically influenced boards and senior appointments facilitate tender manipulation. In other cases, corrupt officials cooperate with external criminals involved in infrastructure theft, sabotage and building hijacking, while some officials engage in outright extortion.

The result is that criminals exploit a failing city and that the potential proceeds of corrupt activity create incentives that directly contribute to institutional and urban failure, where deteriorating infrastructure, emergency procurement and weak enforcement can create new opportunities for profit.

This crime-council ecosystem consists of three overlapping levels.

- At the top is the political capture of parts of the municipality, especially municipal entities and their procurement processes. Political influence over boards and senior management weaken the supposed separation between political oversight and operational decision-making, opening the way for tenders to be manipulated, inflated or directed towards connected businesses.
- At the second level, there are hybrid criminal networks involving officials, contractors and criminals operating around services such as electricity, water and property.
- At the third level are more direct forms of criminality, including extortion by municipal employees or contractors.

Violence and intimidation can cut across all three levels, protecting corrupt interests and threatening investigators, whistleblowers, politicians and legitimate businesses.

This system has flourished and deepened alongside persistent institutional instability. Since the loss of a stable political majority in 2016, a series of precarious coalitions have led to rapid turnover in

the mayorship, boards of major entities, and bargaining over senior positions with access to resources. (See CDE's two recent reports: **Kickstarting delivery - Joburg's Mission Critical Jobs** and **Powering Joburg's Turnaround**). This has helped create extreme institutional dysfunction and instability. At the same time, transparency and accountability mechanisms have been weakened; procurement processes and necessary emergency deviations from normal tendering rules are routinely abused; financial reporting is fragmented; and investigations have been frustrated. City structures intended to identify and respond to wrongdoing, such as the Group Forensic and Investigation Services (GFIS), have come under the shadow of political influence and lack the capacity and capability to tackle the scale and severity of the problem.

Stacking the Johannesburg Property Company (JPC) board

In 2023, MMC Nomoya Mnisi was accused of filling the JPC board with political allies, including a chair from her own ANC branch. The appointees reportedly included “a tollgate cashier, a receptionist and a person with a grade 11”. The same year, ActionSA laid a charge alleging that Mnisi had told the JPC's acting CFO to pay almost R900 000 for an ANC youth event. The CFO refused and resigned. Mnisi denies wrongdoing. This fits a wider pattern in which boards are replaced whenever the governing coalition changes.

Source: **Joburglary**, p13

This diagnosis has an important implication for reform. Johannesburg's crime-council ecosystem cannot be solved simply by issuing better rules, demanding improved compliance or asking officials to behave more ethically because, as demonstrated by the recent past, the institutions responsible for enforcing those rules can be manipulated, ignored or disabled. The key task, therefore, is to design systems that remain effective even when powerful actors have incentives to defeat them. That means reducing opportunities for hidden discretion, exposing procurement and appointments to much greater public scrutiny, protecting investigations from interference, creating automatic escalation mechanisms for sensitive cases, and ensuring that serious wrongdoing gives rise to disciplinary, civil or criminal consequences.

The objective, in other words, cannot be to develop yet another municipal anti-corruption strategy with worthy intentions. The new Johannesburg administration has to change the incentives surrounding corruption by making wrongdoing harder to conceal, easier to detect and much more likely to result in consequences for those who engage in it.

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If and when a new Council intent on cleaning up the City and its administration is elected, the design of its anti-corruption programme needs to be premised on the assumption that powerful people, inside and outside the City's structures, will try to defeat new systems and policies. Any other assumption would be hopelessly naïve.

It follows, therefore, that reforms should favour mechanisms that are automatic, transparent and externally verifiable over mechanisms that depend heavily on discretionary action by senior officials. This approach has particularly important implications for procurement, appointments, investigations and disciplinary action.

This report focuses on what the City could do to protect itself from enemies within and to ensure that those protections are resilient when put to the test.

Make procurement radically transparent

Few areas are more vulnerable to malfeasance than procurement processes.

Johannesburg spends around R20 billion a year purchasing goods and services from external service providers. Every procurement decision and every invoice submitted creates an opportunity for money to be diverted through inflated prices, unnecessary contracts, poor project specifications, manipulated scoring, collusive bidding or a supplier's failure to deliver what was contracted.

The Johannesburg fleet contract and alleged political kickbacks

Joburglary describes the controversial award of Johannesburg's R1.26 billion vehicle-fleet contract in 2018. In the original competitive tender, the incumbent provider, Avis, ranked first, while Afrirent ranked last among the five bidders that reached final scoring. The tender was cancelled after problems were identified in the process. Rather than correct the problems and re-advertise it, the City appointed Afrirent without a fresh competitive tender by using Regulation 32 to piggyback on an existing Mogale City contract.

The timing raised further questions. Afrirent paid R300 000 to Mahuna Investments, controlled by Julius Malema's cousin, the day before its representatives appear to have met City officials about a possible Regulation 32 appointment. A further R200 000 was paid while the City was considering the appointment. AmaBhungane reported that Mahuna had previously been used for the benefit of Malema and the EFF. Afrirent said the payments were for unrelated work in Limpopo and strongly denied that they were kickbacks.

National Treasury later called for an investigation into the fleet contract and questioned why the original tender had not simply been corrected and re-advertised.

Source: **Joburglary**, p17

Traditionally, procurement control has relied heavily on internal procedures. But if insiders are implicated in criminality and corruption, that implies that those controls have been defeated and, logically, can be defeated again. So, the best response is radical transparency.

"If insiders are implicated in criminality and corruption the best response is radical transparency."

Johannesburg needs to create a public procurement platform covering the entire life cycle of significant municipal contracts. One way to communicate this information could be a public dashboard. It should not merely announce who won a tender since, by that stage, many of the most important decisions have been made (and may have been improperly distorted).

The public procurement data should include (subject only to legitimate legal restrictions):

- the motivation for the procurement;
- the tender specifications;

- the identity of all members of the relevant bid committees;
- the number of bidders and their identities;
- how these were scored;
- whether any tender was disqualified;
- whether there were any deviations from normal procedures (e.g. the use of emergency procurement processes);
- the identity of the successful bidder and its beneficial owners;
- the identity of major subcontractors;
- whether any contract variations were approved and by whom;
- all invoices submitted and payments made; and
- evidence of delivery and final certification.

If an investigation, disciplinary process or recovery action subsequently arises from a contract, that too should be reflected.

Suppliers must also be required to disclose information about themselves to the City, and this should be made publicly available. This should include all beneficial ownership information. And the tender documents should make clear that any misrepresentation will be treated as fraud.

This level of transparency would change the enforcement environment. It would allow other officials, councillors, auditors, businesses, competitors, journalists and civil society organisations to identify suspicious patterns in tender awards, pricing and delivery that internal systems may miss or suppress and to alert the relevant authorities. Where necessary, secure, anonymous reporting channels could be created (see below).

This would be greatly facilitated if the City used its own data more effectively to generate red flags. It could, for example, match all its own data (personnel and councillors' IDs and addresses) against all available supplier data (directorships, beneficial owners, ID numbers and addresses) to try to identify any undisclosed connections between the City's staff and councillors and its suppliers as well as connections between suppliers. AI could be deployed to look for all undeclared connections. It could also be used to identify other kinds of anomalies, such as suppliers who win multiple contracts at values just below the thresholds that trigger public tender requirements or for evidence of split-purchase practices intended to ensure no single transaction is above those thresholds.

Other red flags might include contracts won by newly formed entities or service providers that appear to specialise in winning emergency tenders. These contracts could be flagged as high-risk and subject to more scrutiny. For example, the City could require verification certificates (including geo-tagged and time-stamped photos of goods delivered and infrastructure completed) before making any payment, with a rotating pool of qualified engineers and quantity surveyors used for signing off on the relevant documentation. For the largest capital projects, a budget should be made available to pay for independent professionals, unconnected to both the City and the service provider to monitor progress and sign off on invoices.

But sunlight alone cannot substitute for enforcement; other interventions will also be needed.

Make appointments harder to manipulate

Political influence over appointments to run the municipal entities is an obvious vulnerability in the system. These control large budgets and critical services, so their boards matter enormously. As set out in a separate CDE report (**Kickstarting delivery - Joburg's Mission Critical Jobs**), the new administration needs to put processes in place to ensure that candidates have the right mix of skill, experience and integrity, and that appointments cannot easily become rewards for political loyalty or mechanisms through which networks gain influence over procurement.

“The new administration needs to put processes in place to ensure that candidates have the right mix of skill, experience and integrity”

To do this, the appointment process should be made radically more transparent and difficult to manipulate. As a rule of thumb, the more senior the municipal position, and the greater the influence it exercises over money, appointments and contracting, the stronger the presumption should be in favour of open recruitment, published criteria, professional assessment and recorded reasons for decisions. This follows Zondo Commission recommendations regarding the independent and transparent process that should be followed when filling state enterprise executive positions, “so that the ultimate appointment... is genuinely the result of a merit-based selection process”¹.

Attack the economics of crime

There is some scope for the City to reduce opportunities for organised crime through better technical and contracting decisions. Some infrastructure is particularly vulnerable to theft, for example. Where economically and technically feasible, redesigning infrastructure to reduce its resale value or ease of theft may make sense. One example of this is the Jozi My Jozi solar streetlight initiative which, since August 2024, has installed more than 2 000 streetlights across the city. Solar streetlights don’t use traditional cables with high resale value. Jozi My Jozi has reported that the only damage to their lights was the result of a car accident.²

Water failure as a business model

Joburglary, describes “water mafia” syndicates in which contractors, corrupt officials and criminals may benefit from water shortages. Pipes, pumps or treatment facilities can be sabotaged or repairs obstructed so that communities become dependent on tankers; the resulting emergency creates lucrative procurement opportunities. Against that background, in 2026, a court set aside Johannesburg Water’s three-year tanker tender worth at least R263 million. It had been awarded to two companies run by men in their twenties who had previously shared an address.

Source: **Joburglary**, p30

Similarly, dependence on emergency procurement can generate lucrative opportunities for politically connected suppliers and criminal networks. Reducing reliance on emergency water tankers, repeated repair contracts or other predictable emergency spending may therefore reduce rents available to corrupt actors. More generally, the City should dramatically reduce the scope for emergency procurement and make sure that all such deviations from normal procurement are (a) authorised at a high level and (b) reported to Council within ten days.

Copper theft and the repair tender

City Power has disciplined electricians, security officers, team leaders and senior managers over theft and collusion with contractors. Interviewees describe a double payoff: steal and sell the copper, then win the tender to fix the damage. In one reported scheme, police acting for a politician told guards to stand aside while a transformer was stolen. The people behind the theft then benefited from the replacement tender and the thieves were arrested to show the case was “solved”. Senior figures allegedly place relatives in companies that buy stolen copper.

Source: Joburglary, p32

The City might also seek to ensure that where emergency procurement must take place, there is at least some element of unpredictability in the award. For instance, if the City has to contract a water tanker service when there is an outage, but the business that receives the commission is chosen randomly from a panel of pre-selected, qualifying suppliers, that might weaken the incentive that so-called “water mafias” have to damage water pipes in the first place. In addition, suppliers on these panels should lose their positions for repeated failure to meet service delivery requirements. That way, serial non-performers might be weeded out of the system.

These are worthwhile measures. But they should not be oversold.

Organised criminal groups are adaptable. Close one opportunity and they frequently seek another. Replace theft-prone infrastructure and syndicates may target something else. Tighten one contracting process and corrupt networks will likely shift their attention to another.

“Organised criminal groups are adaptable. Close one opportunity and they frequently seek another.”

There is, unfortunately, an unavoidable whack-a-mole quality to prevention if national enforcement is weak. This is why Johannesburg’s anti-corruption strategy cannot be confined to what the municipality can do internally.

Use lifestyle audits strategically

Proposals to subject officials to lifestyle audits have been made by numerous organisations. The value of these exercises is easy to overstate, however, and it is equally easy to underestimate the legal challenges associated with their implementation.

There is an obvious rationale for scrutinising unexplained wealth among officials occupying corruption-prone positions. An employee whose standard of living, assets or spending are not consistent with their income may have legitimate questions to answer.

But employers - whether in the public or private sector - are not automatically entitled to the kind of information needed to conduct a lifestyle audit on their employees. For that reason, the City needs to build into its employment contracts the requirement that those who are in positions of authority must (a) declare all external sources of income and wealth and (b) any source of potential conflict of interest. In addition, they must agree that the City can take all reasonable steps to verify these claims and that they will provide the information needed to do so, including authorising the City to request the Financial Intelligence Centre (FIC) to approach financial institutions to obtain information.

An important gap here, and one that cannot easily be closed, is that even if an employee consents to a lifestyle audit and agrees to make information about their finances available to an investigator,

there is no plausible basis for asking the same of that employees' relatives, nor is there any way that an employee could volunteer an intrusion by their employer into the private affairs of someone else.

In addition, suitable safeguards will, of course, have to be built to ensure that the information, when provided by the FIC, is secured against any further breach of individual's rights to privacy.

Lifestyle audits, in other words, while they may help to combat corruption, are by no means a silver bullet. If done well, they are also both time-consuming and resource intensive. The City should therefore concentrate lifestyle audit resources on genuinely high-risk positions rather than attempting surveillance of all employees.

Critically, the City (along with the press and the public) will need to recognise that a lifestyle audit can do no more than identify risk; it cannot definitively prove guilt. So, a discrepancy should trigger proportionate further investigation, not public accusation. The entire process must, therefore, be treated with confidentiality and sensitivity. Publishing unresolved suspicions would create substantial legal and reputational risks.

Give investigators real independence

The City needs to fix the structural problems with its GFIS. As reported in *Joburglary*:

GFIS was launched by then mayor Herman Mashaba in November 2016 to “ensure that an effective fraud risk management process is in place to provide operational effectiveness to the City’s prevention, detection, investigation, and response to the risks of fraud, corruption, theft of assets and maladministration”. It investigated over 6 000 cases involving transactions worth R35bn but faced sustained political push-back as well as pressure from criminal groups.

In June 2023, the city adopted a report declaring all previous corruption probes and forensic findings conducted by the GFIS to be “unlawful, null, and void”, and handed the watchdog’s powers to City Manager Floyd Brink. Notably, Sinaye Nxumalo, the current acting head of GFIS, was herself the subject of a corruption investigation at the time of her appointment in 2023. (There was no publicly available information on the outcome of the investigation at the time of writing.)

In 2022, allegations by some council members that GFIS was spying on them – allegedly with the use of cell phone grabbers – led to a multimillion-rand internal investigation. These allegations were eventually found to be baseless, GFIS was cleared by the State Security Agency and the NPA declined to prosecute. GFIS remains technically operational but the 2024 assassination of a former forensic investigator – believed to have been investigating corruption involving members of the Johannesburg Metropolitan Police Department (JMPD) – has had a chilling effect on internal reporting, according to interviewees. One interviewee described the operating environment of GFIS investigators as one of “fear, intimidation and threat to life”.

Considering the above, the City needs to address the capacity of GFIS and its institutional independence. The right questions to ask include: Who appoints (and removes) its leadership? Who determines its budget? Who may initiate an investigation? Who can prevent one from being initiated? Can an investigation be stopped once it has begun? To whom does GFIS report? What happens if the subject of an investigation is the City Manager, the mayor, or an equally powerful person, whether in the City or outside it?

These are not technical details. They are the substance of independence.

A forensic unit may sit inside the municipal organogram and still function independently in practice. Conversely, an organisation described as independent may be completely vulnerable if its budget, appointments and investigations can be controlled by the people it may need to investigate. This is an example of the classic problem: *Quis custodiet ipsos custodes?* (Who watches the watchmen?).

Unfortunately, there is no foolproof way to address this vulnerability. However, it can be mitigated with tried and tested processes, such as those applied by independent internal audit functions at large corporates. It is also important to establish clear, automatic escalation mechanisms for sensitive investigations. For example, some kinds of allegation might automatically trigger specified procedures. Where allegations concern officials exercising authority over GFIS, for example, or where serious conflicts of interest arise, provision should exist for investigations to be conducted by appropriately qualified external investigators and, where criminal conduct is suspected, referred to the competent national law-enforcement authorities. This should happen automatically so that the decision about whether a powerful person should be investigated does not rest entirely with another official who may depend upon that person for appointment, promotion or political protection.

Automatic referral reduces discretion where discretion is most vulnerable to political influence.

Proton House: a R2m job and a R27m payment

In September 2022, the Johannesburg Property Company (JPC) paid R27m for rental arrears and refurbishment at Proton House. The work had originally been costed at R2m. The then mayor Mpho Phalatse alleged three things: the first quote was ignored, a new quantity surveyor was brought in to produce a higher estimate, and the money was used to bribe councillors to vote her out. The company that was paid had been set up two months earlier. The JPC rejected these claims, but their CEO was suspended. An instruction putting board decisions “in abeyance” blocked a GFIS investigation, and the head of GFIS was later replaced. When the coalition changed, the suspension of JPC’s CEO was lifted and the whole JPC board was replaced.

Source: *Joburglary*, p18

Another form of automatic referral is also helpful: every investigation of a serious allegation – with seriousness defined by the value of the possible wrongdoing and/or the seniority of the suspects – must be reported to both the Auditor-General and the Special Investigating Unit (SIU). The goal here is not to have those agencies take on the investigation, but to create an independent record of the investigation so that it cannot be made to vanish under political pressure. Equally important, a wider distribution of knowledge about the investigation may help protect investigators, even though this may raise other risks (e.g. compromising the identity of whistleblowers).

One example is the City of Cape Town’s Ethics and Forensics Services Department, located within the Office of the City Manager, that is mandated to investigate allegations of corruption and fraud. The department works with investigatory bodies, such as SAPS and the SIU, scrutinising the use of public funds by the City, as well as cases of City corruption and bribery, including instances of criminals extorting or scamming residents by posing as City officials.³

GFIS should have clear mechanisms for ensuring that its findings are not disappeared by accomplices after an investigation is completed. Recommendations should be formally tracked.

Responsible officials should have specified periods in which to respond. Any failure to act should itself be escalated and every time a recommendation is not accepted, reasons must be provided to Council.

A municipal investigative body can investigate losses, assemble evidence, recommend disciplinary action, assist civil recovery processes and make referrals. It will never have the coercive asset-recovery powers of the criminal justice system. Nor should it.

Target the networks that matter most

Johannesburg needs to develop a systematic approach to identifying the cases that matter most, referring them to the appropriate agencies, assembling high-quality evidence, providing additional evidence where needed, and tracking what happens thereafter.

While “zero tolerance” is a good slogan, resources are too scarce to treat every irregularity as a premise for a priority criminal investigation.

The City should focus its energies on the most dangerous networks:

- suppliers about whom questions repeated arise
- politically connected intermediaries
- officials appearing across multiple suspect transactions
- infrastructure theft syndicates
- organised extortion
- corruption involving large procurement streams

The goal should be to move beyond hundreds of disconnected allegations towards a smaller number of well-developed cases capable of disrupting networks. To do this, the City’s senior leadership should regularly engage the relevant law enforcement agencies, and, where the law allows, dedicated multi-agency arrangements should be considered for particularly serious categories of criminality.

The fraudulent transfer of City property

Joburglary describes how corrupt officials can use insider information to identify vulnerable buildings, assist illegal landlords and, at the extreme, facilitate the transfer of property to hijackers. It also describes a long-running criminal case involving the allegedly fraudulent sale and transfer of City-owned properties, involving a former Johannesburg Property Company (JPC) employee and a lawyer. In June 2026, the NPA enrolled a case in the Specialised Commercial Crime Court against Petrus Viljoen alleging that in 2010, he used forged City and JPC documents to sell dozens of municipal properties without the City’s knowledge. The City ultimately obtained court orders returning the properties.

Source: *Joburglary*, p26

Mobilise the criminal justice system

The City cannot prosecute organised crime by itself. It cannot substitute municipal investigators for the SAPS, the Hawks, the NPA or specialised asset-recovery institutions like the Asset Forfeiture Unit and the SIU. However, it can become much better at mobilising those institutions and providing them with the information and evidence that they need to do their work.

“This is key to the whole corruption reform process: if the bad guys in the City do not feel a credible threat of discovery, prosecution and sanction, then every other reform will be much less efficient.”

Make sure investigation leads to consequences

The City should also make it a priority to become better at civil recovery. Criminal prosecution is not the only mechanism available when officials or contractors have caused losses.

Contracts can be challenged. Payments can be contested. Suppliers can be sued for unjust enrichment or face regulatory or procurement consequences where the law permits. Officials can be disciplined and fired if the City rebuilds its disciplinary machinery (see CDE report, **Kickstarting Delivery – Joburg’s Mission Critical Jobs**). They can be sued for disgorgement of secret profits, for breach of fiduciary duty and charged under various provisions of the 2004 Prevention and Combating of Corruption and Related Activities Act (PRECCA), including for having an undisclosed interest in a business that has a contract with one’s employer.

PRECCA also holds out other, more unusual possibilities. Apart from being able to charge a senior official for failing to report corruption among their staff after becoming aware of it, recent amendments mean that a business can also be charged with an offence if its managers have failed to put in place adequate safeguards to prevent their employees’ and other people associated with the firm from paying bribes. Directors can be declared delinquent, which can have severe career implications.

The critical point is that investigations must lead to consequences. Those do not always have to be criminal: contractual claims, claims for unjust enrichment, and other civil remedies can be pursued without law enforcement, and need be proved only on a balance of probabilities, not beyond a reasonable doubt. A forensic report gathering dust in an office is not an anti-corruption achievement.

Protect whistleblowers and witnesses

Johannesburg cannot expect officials, contractors or residents to expose organised corruption if doing so may cost them their jobs or their lives. *Joburglary* records intimidation of investigators and describes the assassination of a former GFIS investigator as having had a chilling effect on internal reporting in Johannesburg (see above). A credible anti-corruption system needs a protection mechanism alongside its reporting channels.

One policy option is a city-wide whistleblower protocol built around three principles.

- First, reporting must be secure and securely confidential. The City could provide an independently operated hotline and encrypted digital channel, allow anonymous reports; separate identifying information from investigative files; and restrict access to a small, vetted team.
- Second, retaliation risks should be assessed as soon as a serious disclosure is received. Where appropriate, protective measures could include temporary transfer, paid special leave, changes to reporting lines, counselling and legal support. Any dismissal, disciplinary action, demotion or other adverse employment step involving a protected whistleblower should trigger independent review. The Protected Disclosures Act 26 of 2000 already prohibits occupational detriment and provides remedies, including transfer in appropriate circumstances.
- Third, threats to physical safety should automatically be elevated above ordinary municipal processes. The City does not have the power to place somebody in the national witness-protection programme, but it can establish a standing referral protocol with SAPS, the NPA and the Office for Witness Protection so high-risk cases are assessed quickly.

These arrangements would complement existing law and anticipate the broader confidentiality, anti-retaliation and witness-protection provisions proposed in the 2026 Protected Disclosures Bill.

Importantly, the City should not rely only on civic duty and professional ethics to persuade people to expose corruption. Reporting wrongdoing can impose substantial personal risks and costs, while the benefits of successful investigations accrue largely to the City. The City could therefore carefully design a system of positive incentives for high-value disclosures, alongside strong confidentiality and protection arrangements.

One option would be a financial reward scheme for information that leads directly to substantial recoveries, avoided losses or successful enforcement action. Rewards should never be paid merely for making allegations, of course, and eligibility should depend on information being original, material and independently verified, with payment normally occurring only after the recovery has happened. Awards could be calculated as a proportion of money recovered or losses demonstrably prevented, possibly subject to a cap. Accomplices and co-conspirators would be automatically ineligible, even if their testimony helps put others in prison.

Any reward mechanism must be tightly governed to prevent malicious reporting, fabrication or conflicts of interest. But, if structured properly, it could help change the cost-benefit calculation that would-be crooks will make.

Let enforcement change the culture

Anti-corruption policy often emphasises the importance of organisational culture. There is clearly some truth in this. Organisations are likely to be much less subject to corruption if their leadership talks about resisting corruption, tells staff what they can and should do when they have suspicions, and is very clear about what it expects of officials.

But in the public sector particularly, “changing the culture” is often recommended precisely because it is difficult to measure and places few demands on powerful institutions.

Johannesburg does not primarily need workshops persuading officials that corruption is wrong. It needs systems making undertaking corruption difficult and more likely to be identified, prosecuted and sanctioned. That will have more impact on the City’s organisational culture than any number of culture-focused interventions. When employees see rules being enforced, the culture will change much more quickly than any number of Batho Pele seminars could achieve. A constructive workplace culture is often the consequence of effective institutions rather than their cause.

CDE recommendations

A new Johannesburg administration should act quickly to build an anti-corruption system that can withstand resistance. The priorities should follow a clear logic: prevent opportunities for corruption, detect wrongdoing, investigate it effectively, disrupt the networks behind it, punish those responsible and protect those who expose it. Here are the ten key priorities for action after the local government elections.

- **Make procurement radically transparent.** Publish information across the full life cycle of major contracts, from specifications and bid scoring to beneficial ownership, variations, invoices, payments and proof of delivery. Use City data to identify suspicious connections and procurement patterns.
- **Make political appointments harder to manipulate.** Introduce open, merit-based processes for senior positions and municipal entity boards, with published criteria, professional assessment and recorded reasons for appointments.
- **Attack the economics of organised crime.** Reduce opportunities to profit from infrastructure theft, sabotage and emergency procurement, including through using less theft-prone infrastructure and instituting tighter controls on emergency contracts and stronger supplier performance rules.
- **Use lifestyle audits strategically.** Require appropriate financial and conflict-of-interest disclosures for officials in high-risk positions and concentrate lifestyle audits where corruption risks are greatest, while maintaining privacy and legal safeguards.
- **Give investigators real independence.** Strengthen GFIS and protect its leadership, budget and investigations from political interference. Sensitive investigations should trigger automatic external referral or oversight, and completed findings should be formally tracked so that they cannot simply disappear.
- **Target the criminal networks doing the most damage.** Concentrate scarce investigative resources on repeat suppliers, politically connected intermediaries, officials linked to multiple suspect transactions, infrastructure syndicates, organised extortion and major procurement corruption.
- **Mobilise the criminal justice system.** Prioritise serious and repeat offenders, build stronger cases, refer them systematically to the appropriate law-enforcement agencies and track what happens after referral.
- **Make investigations lead to consequences.** Use disciplinary action, civil recovery, contractual remedies and anti-corruption law alongside criminal prosecution. The City should recover losses and impose consequences rather than allow forensic reports to gather dust.
- **Protect and incentivise whistleblowers.** Establish secure reporting channels, protect whistleblowers against retaliation, create rapid referral mechanisms where physical safety is threatened and consider carefully designed rewards for information that results in substantial recoveries or successful enforcement.
- **Change the culture.** Organisations in which the leadership stresses the importance of resisting corruption and the ethical conduct expected from staff are likely to perform better than those in which corruption is normalised. However, it is generally true that systems making corruption difficult, visible and risky for those involved have more impact on organisational culture than culture-focused interventions.

Concluding thoughts

There can be no serious conversation about fixing Johannesburg without confronting the crime and corruption that have taken hold in the City. Johannesburg's decline has been made worse by corruption that diverts money meant to repair bridges, keep streets clean, maintain infrastructure and keep the water running. Instead, failing systems have created opportunities for corrupt officials, connected businesses and criminal networks.

More troubling still, the City's decline has become profitable. Infrastructure theft creates contracts for repairs. Water failures create demand for tankers. Dysfunction creates opportunities for emergency procurement. Those who benefit from failure therefore have an interest in on-going institutional dysfunction. This is the vicious cycle Johannesburg must break.

Johannesburg's governance crisis will not be solved through one anti-corruption agency, one lifestyle-audit programme, one transparent procurement portal or one new appointments process. The rot is too deep. Johannesburg needs new leadership willing to pursue a set of interconnected reforms and sustain them in the face of resistance. The priorities set out in this report provide a place to start.

CDE's recommendations are designed to provide priorities for an incoming administration. Civil society and business should explore workable ways to provide additional oversight and offer support, but the immediate responsibility lies with Johannesburg's next administration. It must make corruption harder to commit and conceal, easier to detect and investigate, and far more likely to result in arrests.

New leadership will matter enormously. But institutions designed on the assumption that leaders will always be competent, honest and courageous will remain vulnerable. Johannesburg needs systems that benefit from good leadership but can also withstand bad leadership and attempts by powerful interests to circumvent or disable them. That means reducing opportunities for hidden discretion, increasing transparency, professionalising appointments, protecting investigations and ensuring that wrongdoing produces consequences.

There is no shortage of ethical codes, procurement rules, financial regulations or declarations of principle in South African government institutions. It is the gap between rules and outcomes that is the problem. To close that gap, Johannesburg must create institutions that continue to function when powerful people have incentives to evade those rules.

The city desperately needs leaders committed to dealing with corruption and criminality in and around the administration and its politics. The danger that it experiences more of the same for the next five years is immense. The November elections are an opportunity to put Johannesburg on a better path. Voters should seize it.

Endnotes

- 1 Commission of Inquiry into State Capture, Report: Part VI, Vol. 4: Summary of Recommendations', (2022)
- 2 Alex Patrick, 'Joburg reilluminated: Jozi My Jozi lights up Maboneng, Ellis Park with 2 000 solar lights', News24, (26 February 2026).
- 3 City of Cape Town, 'Fraud fighters: City reaffirms zero tolerance against fraud during International Fraud Awareness Week', (20 November 2024); Cape Town, Etc., 'Senior municipal official's bravery leads to arrest in Cape Town bribery sting', (4 March 2026).

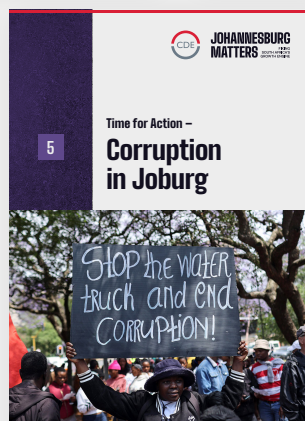
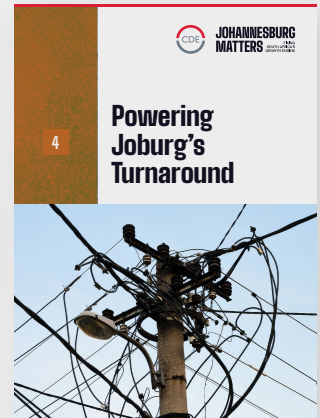
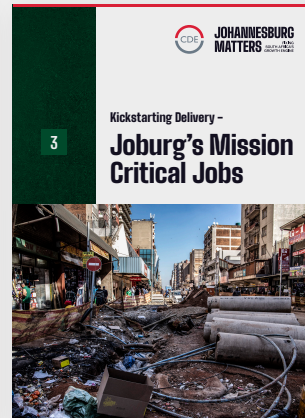
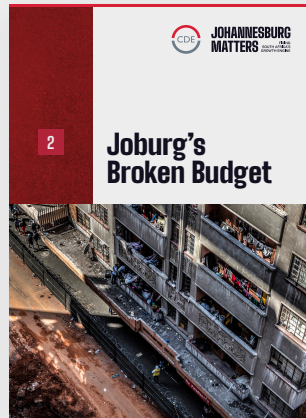
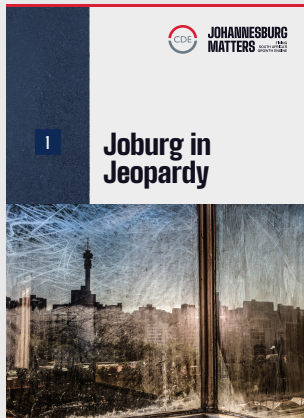
CDE's work on cities (1996 to 2023)

- South Africa's future will be decided in our cities, 2023
- Building Better Cities: A new approach to housing and urban development, 2020
- Urban management in the 21st century: Ten insights from Professor Ed Glaeser, 2019
- Agenda 2019: Creating cities of hope, 2019
- The Growth Agenda: Cities, 2016
- Cities: Pathways to prosperity, 2015
- Cities of Hope: Young people and opportunity in South Africa's cities, 2014
- The new urban paradigm: A radical departure in city management, 2003
- Johannesburg: Africa's World City: A challenge to action, 2002
- Pretoria: From apartheid's model city to an African rising star? 1998
- Atlanta, USA: Racial transition, business and economic growth, 1997
- The East Rand: Can South Africa's workshop be revived? 1997
- Durban: South Africa's global competitor? 1996
- Cities and the global economy: New challenges for South Africa, 1996



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