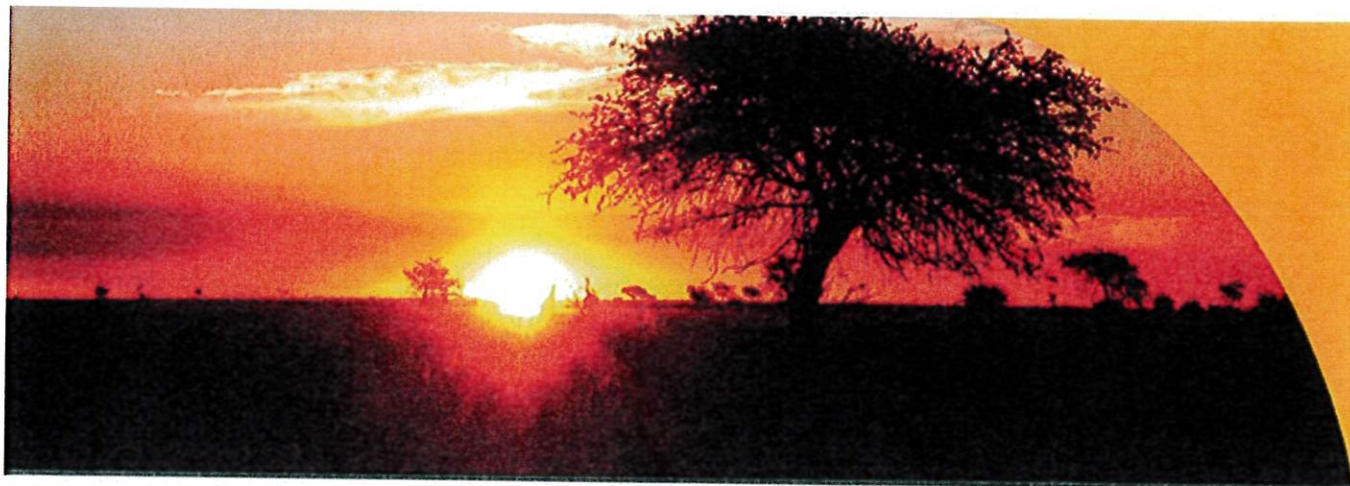




DCSR POLICY: ETHICS MANAGEMENT POLICY

DOCUMENT INFORMATION AND LOG

File Name	Ethics Management Policy
Original Author	Department of Culture, Sport and Recreation
Review Date	2028 / 2029

1. PURPOSE

The purpose of this Policy is to establish an ethical culture within the Department of Culture, Sport and Recreation (DCSR) by promoting integrity, accountability, transparency, professionalism, and responsible conduct in the execution of departmental functions. The Policy provides a framework for managing ethics, preventing unethical conduct, and ensuring compliance with applicable legislation and ethical standards in the Public Service. The policy aligns with Section 195 of the Constitution, the Public Service Act, the Public Administration Management Act, and the Public Service Regulations.

2. POLICY OBJECTIVES

The objectives of this Policy are to:

- a) Promote a culture of ethical leadership and ethical conduct throughout the Department.
- b) Prevent and detect unethical conduct, fraud, corruption, maladministration, and conflicts of interest.
- c) Ensure compliance with the Public Service Code of Conduct and other applicable legislation.
- d) Enhance public confidence and trust in the Department.
- e) Provide mechanisms for reporting, investigating, and addressing unethical conduct.
- f) Integrate ethics management into departmental governance, risk management, and performance management systems.
- g) Promote ethical decision-making and accountability among all employees.

3. LEGISLATIVE AND REGULATORY FRAMEWORK

This Policy is informed by:

- Constitution of the Republic of South Africa, 1996
- Public Service Act, 1994
- Public Administration Management Act, 2014
- Public Service Regulations, 2016
- Protected Disclosures Act, 2000
- Prevention and Combating of Corrupt Activities Act, 2004
- Public Finance Management Act, 1999
- Public Audit Act, 2004
- National Anti-Corruption Strategy
- Public Service Code of Conduct
- Batho Pele Principles
- Relevant DPSA Directives and Circulars.

4. SCOPE OF APPLICATION

This Policy applies to:

- All permanent employees;
- Contract employees;
- Interns and learners;
- Volunteers;
- Consultants and service providers acting on behalf of the Department;
- Members of governance structures and committees established by the Department.

5. ETHICAL VALUES AND PRINCIPLES

The Department commits to the following ethical values:



6. ETHICS GOVERNANCE STRUCTURE

6.1 Accounting Officer

The Head of Department shall:

- Provide ethical leadership.
- Promote ethical culture.
- Ensure implementation of this Policy.
- Allocate resources for ethics management.
- Ensure corrective action where unethical conduct occurs.

6.2 Ethics and Risk Management Committee

The Department shall establish an Ethics Committee responsible for:

- Oversight of ethics management.
- Monitoring ethics risks.
- Reviewing ethics reports.
- Recommending interventions.
- Monitoring implementation of ethics programmes.

6.3 Chief Risk Officer / Ethics Officer

The Ethics Officer shall:

- Coordinate ethics management activities.
- Conduct ethics risk assessments.
- Facilitate ethics awareness programmes.
- Monitor disclosures and declarations.
- Maintain ethics registers.
- Report on ethics management performance.
- Provide ethics advice and guidance.

6.4 Senior Managers

Senior managers shall:

- Promote ethical conduct within their units.
- Address unethical conduct promptly.
- Ensure employees understand ethical obligations.
- Lead by example.

6.5 Employees

Employees shall:

- Comply with this Policy.
- Observe the Code of Conduct.

- Report unethical conduct.
- Avoid conflicts of interest.
- Participate in ethics awareness initiatives.

7. ETHICS RISK MANAGEMENT

The Department shall proactively identify, assess, manage, and monitor ethics-related risks to promote an ethical culture and prevent misconduct, fraud, corruption, and maladministration. The Department shall:

- Conduct ethics risk assessments at least every three years or as required by emerging risks, legislative changes, or organisational needs.
- Identify and assess ethics vulnerabilities, corruption risks, conflicts of interest, and areas susceptible to unethical conduct.
- Develop and implement appropriate mitigation measures and action plans to address identified ethics risks.
- Integrate ethics risks into the Departmental Risk Register and broader risk management processes.
- Monitor and evaluate the effectiveness of ethics controls and mitigation measures.
- Report on ethics risk management activities to relevant governance structures.
- Promote awareness of ethics risks and ethical responsibilities among employees.
- Review ethics risk assessments periodically to ensure that emerging risks are identified and managed effectively.
- Ensure that ethics risk management forms part of the Department's overall governance, risk management, and compliance framework.

8. CONFLICT OF INTEREST MANAGEMENT

The Department is committed to ensuring that all decisions and actions are undertaken in the public interest and are free from improper influence. Employees must conduct themselves with integrity, impartiality, and transparency and shall:

- Avoid actual, potential, and perceived conflicts of interest.
- Disclose any personal, financial, family, or business interests that may influence, or be perceived to influence, official duties.
- Declare financial interests and remunerative work outside the Public Service as required by applicable legislation and departmental procedures.
- Recuse themselves from any decision-making process where a conflict of interest exists.
- Not use their position, departmental resources, or confidential information for personal gain.
- Not conduct business with the State or hold interests that are prohibited by law.
- Disclose relationships with suppliers, service providers, contractors, or applicants that may affect impartiality in procurement, recruitment, or other official processes.
- Decline gifts, hospitality, or benefits that may influence, or be perceived to influence, official decisions.
- Report any suspected or undisclosed conflicts of interest through established departmental channels.

Managers and supervisors must ensure that conflicts of interest are appropriately identified, disclosed, recorded, and managed. Failure to comply with this Policy may result in disciplinary action and other measures in accordance with applicable legislation and departmental procedures.

9. FINANCIAL DISCLOSURE MANAGEMENT

The Department shall require designated employees to submit financial disclosures in accordance with the Public Service Regulations, Public Administration Management Act and directives issued by the DPSA.

Financial Disclosure is done on the DPSA e-disclosure system: <https://edisclosure.gov.za>

9.1 Employees Required to Disclose

Financial disclosures shall be submitted by:

- Members of the Senior Management Service (SMS);
- Officials designated by the Head of Department;
- Employees occupying positions identified as high-risk from an ethics and corruption perspective;
- Employees involved in procurement, contract management and financial decision-making where required.

9.2 Matters to be Disclosed

Employees shall disclose:

- Directorships and partnerships;
- Shareholding and other financial interests;
- Property ownership and rental income;
- Sponsorships and financial benefits received;
- Interests in trusts and businesses;
- Gifts above prescribed thresholds;
- Outside remunerative work;
- Interests of spouses, life partners and dependent children where required by legislation.

9.3 Submission and Verification

The Ethics Officer shall:

- Maintain a Financial Disclosure Register;
- Monitor annual submissions;
- Verify disclosures where necessary;
- Follow up on non-submissions;
- Report compliance levels to Executive Management, the Ethics and Risk Management Committee and the Audit Committee.

9.4 Management of Identified Conflicts

Where a disclosure reveals an actual, perceived or potential conflict of interest, the Department shall:

- Assess the nature of the conflict;
- Require mitigation measures;
- Recuse the employee from relevant decision-making;

- Withdraw delegations where necessary;
- Institute disciplinary action where non-disclosure is identified.

9.5 Non-Compliance

Failure to submit financial disclosures, submission of false information, or failure to disclose a conflict of interest shall constitute misconduct and may result in disciplinary action.

10. GIFTS, BENEFITS AND HOSPITALITY

The Department recognises that the acceptance, offering or solicitation of gifts, benefits and hospitality may create actual, perceived or potential conflicts of interest and may compromise the integrity, impartiality and reputation of the Department.

All employees are required to exercise sound judgement and uphold the highest ethical standards when offered gifts, benefits or hospitality in connection with their official duties.

To declare Gifts you log into the DPSA e-disclosure system: <https://edisclosure.gov.za>

10.1 General Principles

Employees shall:

- Not solicit gifts, benefits or hospitality.
- Not accept gifts or hospitality intended to influence decision-making.
- Avoid situations that may create actual, potential or perceived conflicts of interest.
- Ensure that acceptance of any gift does not compromise impartiality or public confidence.
- Seek guidance from the Ethics Officer where uncertainty exists.
- Report any attempted inducement, bribery or inappropriate offer.

10.2 Gift Acceptance Thresholds

The following thresholds shall apply:

Gift Value	Requirement
R0 – R350	May be accepted if it is infrequent, reasonable and does not create a conflict of interest. No approval is required; however, declaration is encouraged.
Above R350	Must be declared in the Gifts, Benefits and Hospitality Register within ten (10) working days of receipt.
Above R1 000	Must be declared and may only be retained with written approval from the Head of Department or delegated authority.

Any value from suppliers, bidders, prospective suppliers, service providers or parties involved in procurement processes	Strictly prohibited and must be declined immediately.
Cash, gift cards, vouchers, loans, discounts, shares, securities or cash equivalents	Strictly prohibited regardless of value.

10.3 Hospitality

Reasonable hospitality associated with official business may be accepted where:

- It serves a legitimate business purpose.
- It does not create an obligation or expectation of favourable treatment.
- It is not excessive or extravagant.
- It complies with departmental policies and ethical standards.

Examples may include:

- Modest meals during official meetings.
- Refreshments at conferences and workshops.
- Attendance at official functions approved by management.

Excessive hospitality, luxury travel, accommodation or entertainment shall not be accepted.

10.4 Protocol and Ceremonial Gifts

Protocol gifts received during official ceremonies, cultural exchanges, stakeholder engagements, international visits or government events may be accepted on behalf of the Department.

Such gifts shall:

- Be declared to the Ethics Officer.
- Be recorded in the Gifts Register.
- Remain the property of the Department where determined by the Head of Department.

11. OUTSIDE REMUNERATIVE WORK

The Department recognises that employees may wish to engage in remunerative work outside their employment with the Public Service. While such activities may be permissible, they have the potential to create actual, perceived or potential conflicts of interest, interfere with official responsibilities or compromise the integrity and reputation of the Department. It is therefore essential that outside remunerative work is properly disclosed, assessed and approved to ensure that it does not adversely affect the Department's operations or the employee's ability to perform official duties effectively.

Employees may not perform remunerative work outside the Public Service without obtaining prior written approval in accordance with the Public Service Regulations and applicable departmental procedures.

Approval shall only be granted where the proposed activity is compatible with the employee's official responsibilities and does not compromise the principles of integrity, impartiality and accountability.

Financial Disclosure is done on the DPSA e-disclosure system: <https://edisclosure.gov.za>

Employees who wish to undertake outside remunerative work shall:

- Obtain prior written approval before commencing such work.
- Fully disclose the nature and extent of the proposed activity.
- Declare any actual, perceived or potential conflicts of interest.
- Ensure that the activity does not interfere with official duties or working hours.
- Immediately disclose any changes to the approved arrangement.

Employees shall not:

- Conduct business with the State in contravention of applicable legislation.
- Use departmental resources, equipment, information or facilities for personal gain.
- Use confidential information acquired through their employment for private benefit.
- Engage in activities that may compromise their impartiality or independence.
- Undertake work that may bring the Department or the Public Service into disrepute.

The Department reserves the right to review, suspend or withdraw approval where it is determined that the outside remunerative work creates a conflict of interest, affects service delivery or is inconsistent with the values and principles contained in this Policy. Failure to obtain the necessary approval or comply with the conditions of approval may constitute misconduct and may result in disciplinary action.

The Ethics Officer, in collaboration with Human Resource Management, shall monitor compliance with outside remunerative work requirements and maintain a register of approvals, declarations and related documentation for oversight and reporting purposes.

12. WHISTLE-BLOWING AND REPORTING OF UNETHICAL CONDUCT

The Department adopts a zero-tolerance approach to unethical conduct.

Employees may report:

- Fraud;
- Corruption;
- Maladministration;
- Financial misconduct;
- Abuse of power;
- Conflict of interest;
- Unethical conduct;
- Violations of legislation or departmental policies.

Reports may be submitted through:

- Immediate supervisors;
- Ethics Officer;

- Internal Audit;
- Risk Management Unit;
- Whistle-Blowing Hotline;
- Public Service Commission;
- Relevant law enforcement agencies.

Whistle-blowers shall be protected in accordance with the Protected Disclosures Act.

Retaliation against whistle-blowers is prohibited and constitutes misconduct.

13. ETHICS TRAINING AND AWARENESS

The Department shall implement:

- Ethics orientation for new employees.
- Annual ethics awareness campaigns.
- Ethics workshops and seminars.
- Ethics Champion programmes.
- Ethics communication initiatives.

Attendance registers shall be maintained for monitoring purposes.

14. ETHICS COMMUNICATION

The Department shall communicate ethical standards through:

- Circulars;
- Newsletters;
- Posters;
- Workshops;
- Intranet platforms;
- Ethics forums;
- Management meetings.

15. INVESTIGATION OF ETHICAL MISCONDUCT

Reported allegations shall:

- Be referred to the Forensic Investigation Unit at the Office of the Premier

16. DISCIPLINARY ACTION

Employees found guilty of unethical conduct shall be subjected to:

- Corrective measures;
- Disciplinary action;
- Recovery of losses;
- Criminal prosecution where applicable.

Disciplinary action shall be implemented in accordance with labour legislation and Public Service disciplinary frameworks.

17. ETHICS MONITORING AND REPORTING

The Ethics Officer shall submit quarterly reports to:

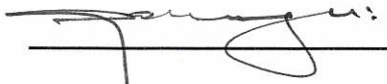
- Ethics and Risk Management Committee;
- Executive Management;
- Audit Committee;

18. REVIEW AND AMENDMENT

This Policy shall be reviewed at least once every three (3) years or earlier where:

- Legislative changes occur;
- Governance requirements change;
- Material control weaknesses are identified;
- Directed by the Head of Department.

19. APPROVAL



MR EM MAHLANGU
HEAD: CULTURE, SPORT AND RECREATION

DATE: 01 / 04 / 2026