

EPWP POLICY, RECRUITMENT GUIDELINES & AUDITS

14 NOVEMBER 2018



public works

Department:
Public Works
REPUBLIC OF SOUTH AFRICA



EXPANDED PUBLIC WORKS PROGRAMME



EPWP Policy Overview



Basis for the EPWP Policy Development

- Since the inception of the EPWP in 2003, the programme operated without a written over-arching policy framework with its implementation guided by various policy documents such as the EPWP Ministerial Determination, approved Cabinet policy positions, etc.
- The 2016 EPWP Summit and the 2017 Minister of Public Works Policy Statement resolved that an overarching EPWP policy be developed to address existing gaps identified in the programme.
- To deliver on this assignment, an inter-departmental task team (consisting of sector lead departments and the ILO) has been established.
- The work to develop an EPWP Policy has started in July 2018, broken down into two phases.

The EPWP Policy Development Process

Phase 1: Collation and consolidation of existing written policy prescripts of the EPWP in its current form.

This Phase was shorter in duration (2 months) and did not require extensive and wide consultations with stakeholders.

The work covered during this phase entailed:

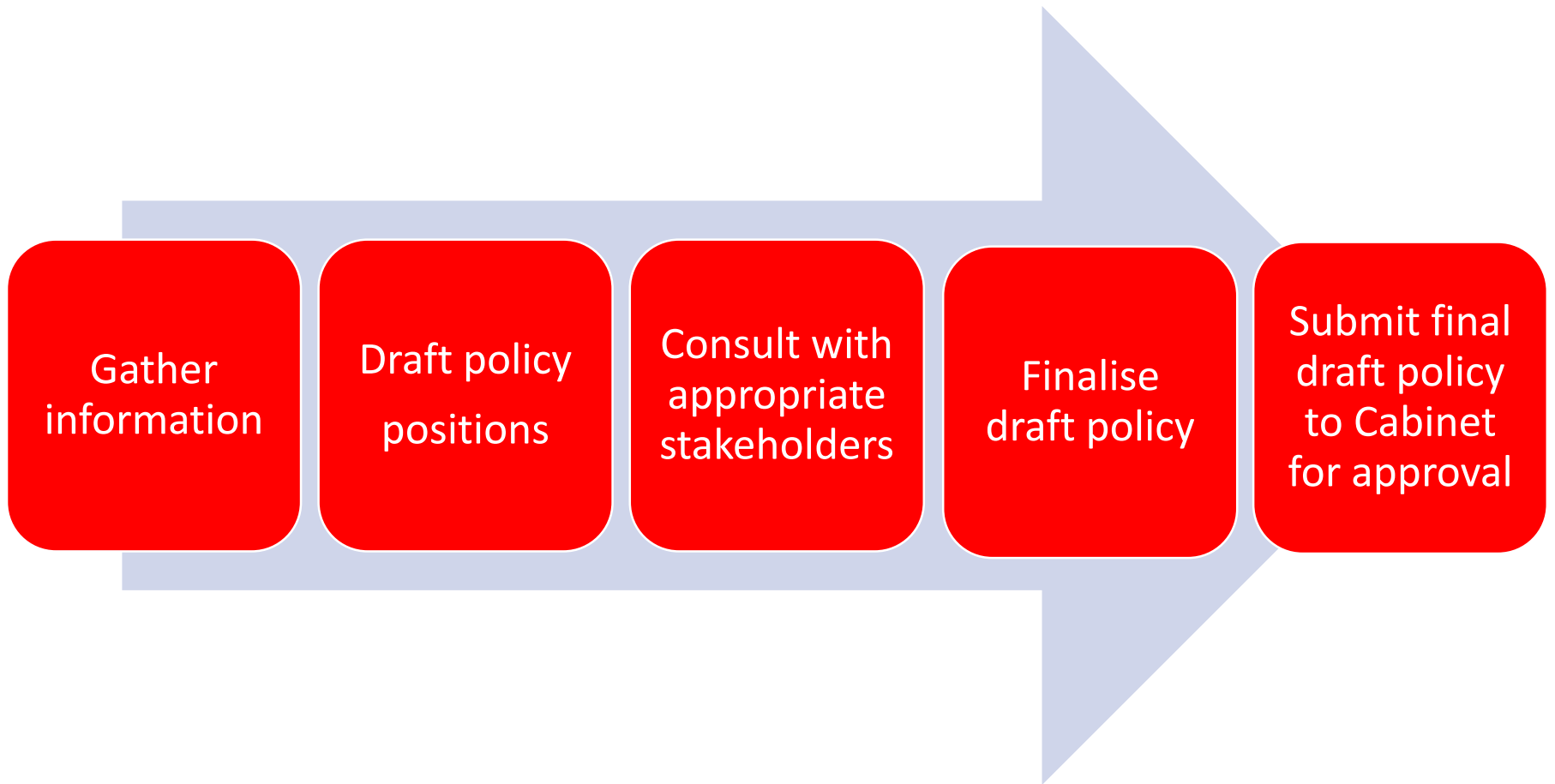
- a) Reviewing relevant material to feed into the EPWP Policy consolidation.
- b) Engaging in necessary consultation with relevant stakeholders to secure their input.
- c) Consulting the Steering Committee and relevant structures on the revision of the working draft policy.
- d) Developing a consolidated inferred EPWP Policy.

The EPWP Policy Development Process...cont'd

Phase 2 - Review of the inferred policy (output of phase 1) and development of a future oriented EPWP policy, this is full scale policy development process, which requires wide and extensive consultation. This Phase will entail but not limited to:

- a) Reviewing relevant material to feed into the Policy development process.
 - b) Participating in stakeholder consultation forums and accurately and systematic record inputs made.
 - c) Consolidate and synthesise inputs received from stakeholder forums.
 - d) Engage with the Steering Committee and relevant structures on revisions to the draft policy.
 - e) Develop an EPWP Policy.
- It is envisaged that the assignment will be carried out over a period of 12 months from mid November 2018 – Nov 2019.

The EPWP Policy Development Process...cont'd



Timelines –Policy Development (Phase 2)

No	Action	Proposed Date	Location	Present
1.	Task team meeting - Roadmap development - Defining scope of work	12 Nov 2018	Pretoria	EPRI Policy Task Team
2.	Inception report	30 Nov 2018	Online	EPRI
3.	Undertake research on EPWP draft policy	Dec 2018 – Jan 2019	Pretoria	EPRI
4.	Interviews with stakeholders	Feb – March 2019	All Provinces & via skype	EPRI
5.	Workshop with govt stakeholders on draft policy positions	April 2019	Pretoria	EPRI & all EPWP govt stakeholders
6.	Revise draft policy positions incorporating comments from workshop	Mid April 2019	Online	EPRI
7.	Consultations with MinTech and MinMecs	May 2019	Pretoria	EPWP
8	Draft policy positions submitted to Minister of Public Works to request approval for consultations	June 2019	Pretoria	EPWP

Timelines –Policy Development (Phase 2)

No	Action	Proposed Date	Location	Present
9.	Public Consultations (Labour, Business, Community & Govt)	July - Sep 2019	Provinces	Policy Task Team supported by EPRI
10.	Final draft policy incorporating inputs from consultations	Oct 2019	Pretoria	EPRI & Policy Task Team
11.	Submission of the final draft policy to Clusters	Oct 2019	Pretoria	EPWP Exco
12.	Submit to Minister of Public Works for submission to Cabinet	Oct 2019	Pretoria	EPWP Exco
13.	Submission to Cabinet Committees & Cabinet	Nov 2019	Pretoria	DPW

EPWP Recruitment Guidelines

Recruitment Guidelines in EPWP

The main potential risk area for corruption and fraud in the Expanded Public Works Programme (EPWP) is in the area of recruitment of participants.

To deal with the potential areas of corruption and risk in the recruitment of EPWP participants, the following measures have been put in place:

- (a) The EPWP Recruitment Guidelines have been developed in consultation with stakeholders and approved by Min of Labour in Dec 2018 to ensure alignment with existing labour prescripts in the EPWP, with Min of Public Works launching the guidelines on 28 June 2018.
 - The guidelines describe requirements for fair, equitable and transparent recruitment processes of participants into the EPWP.
 - Further, the guidelines aim to ensure uniformity across all sectors in the process of recruitment of participants and to provide guidance to EPWP stakeholders on their roles and responsibilities.
 - To raise awareness on the Recruitment Guidelines, at present the DPW EPWP Branch supported by Provincial Coordinating DPW are conducting roadshows across all provinces.

RECRUITMENT GUIDELINES

CONTENTS



EPWP Recruitment Guidelines Principles

Fairness

The process should have a predictable methodology that affords equal opportunity to the target community (refer to Code of Good Practice on the EPWP).

The process shall not be manipulated for gain or to discriminate on the basis of colour, tribe, place of birth, ethnic or social origin, language, social status, religious belief, political affiliation, opinion, custom, culture, sex, gender, marital status, pregnancy, disability, economic or social status (refer to Constitution of RSA 1996).

Equity

Potential EPWP participants shall be given equal access regardless of their background in order to enable full and active participation in all aspects of the programme.

Transparency

Target community members shall be afforded opportunity to witness and participate in the entire recruitment process.

Ethics

Persons managing the recruitment process shall be answerable to relevant stakeholders for their actions.

Ethical behaviour shall include:

- Avoidance of conflict of interests.
- Devoid of personal gain.
- Devoid of undue favours.

EPWP Recruitment Guidelines Principles



Respect for the environment

EPWP stakeholders should endeavor to sustain the environment for the benefit of future generations.



Commitment

Nurturing and protecting the wellbeing of the individual, family, communities and the nation through diligent execution of EPWP programme.



Key Issues for consideration- Recruitment of EPWP Participants

- ❑ **Roles and responsibilities** - each public body is responsible for the recruitment and selection of EPWP beneficiaries on each project.
- ❑ **Responsive to EPWP Legislative Requirements** – Code of Good Practice & Ministerial Determination
- ❑ **Community participation in planning processes** - Before initiation of an EPWP project, the target community shall be mobilized to set up committee for presentation at various phases of the project.
- ❑ **Wage Determination** - The public body shall set the wage level before the recruitment of participants, so that participants are not paid less than the minimum wage and not more than prevailing wages for similar work in the project area.
- ❑ **Adequate & Accessible Information** - Community members shall have access to relevant, timely, accurate, and complete information to participate in the recruitment process
- ❑ **Induction** – all new participants in the EPWP to be inducted on the EPWP, their duties, MD etc.
- ❑ **Eligibility** – to be aligned with the self-targeting, community, and geographic targeting.
- ❑ **Targeting and selection** - All EPWP implementing bodies must endeavour to meet the prevailing demographic targets

Roles & Responsibilities of EPWP Stakeholders

NATIONAL

- To develop strategic documents (in this instance recruitment strategies) to assist in the implementation of the EPWP.
- To conduct workshops on the implementation of the Guidelines.
- To ensure alignment of existing EPWP policies with the Guidelines.
- To conduct evaluation assessments on the impact of the Recruitment Guidelines.
- To develop mechanisms to monitor compliance of the EPWP Recruitment Guidelines.

PROVINCIAL DPW

- To provide support to the roll out of the guidelines within the Provinces.
- Utilise existing coordination structures to ensure progress in the implementation of the Guidelines.
- To identify areas of concern with regards to the implementation and communicate them to the national DPW.
- To ensure the social facilitation and induction workshops on the Recruitment Guidelines principles are undertaken.
- To ensure that the recruitment process is undertaken in partnership with the community.
- To ensure wage rates comply with the minimum EPWP wage rates – the rates must be communicated prior to recruitment.

MUNICIPALITIES

- Must ensure that the recruitment of EPWP participants is aligned to the Recruitment Guidelines.
- To ensure that during the facilitation process, the communities are made aware of the recruitment process to be followed, the Ministerial Determination and Code of Good Practice.
- To workshop the relevant community structures on the recruitment process of the EPWP Recruitment Guidelines.
- A process of redress must be outlined before the commencement of the recruitment process.



Measures required to deal with non-compliance on the Recruitment Guidelines

- Non-compliance will be dealt with at operational levels using existing institutional policies.
- Implementing bodies must institutionalise a mechanism to expose non-compliance with this Recruitment Guidelines.
- Implementing bodies must have mechanisms for redress and/or sanctions when duties and commitments are not met.
- The Public Employment Programmes Inter-Ministerial Committee (PEP-IMC) may be leveraged if issues are not resolved at the operational level.

6 point communication plan

1
**Media
engagement**

2
**Marketing
products**

3
**Social media
and Website**

4
**Event
(National
launch)**

5
**Internal
Communications**

6
**Stakeholder
engagement
session**



ROLL OUT PLAN

Guidelines posted
on 24 May 2018 to
the EPWP Website
@
www.epwp.gov.za

Social Media
Campaign on
Recruitment
Guidelines

Marketing
materials on the
Guidelines
including posters
and brochures
developed

National launch of
the EPWP
Recruitment
Guidelines
(28 June 2018)

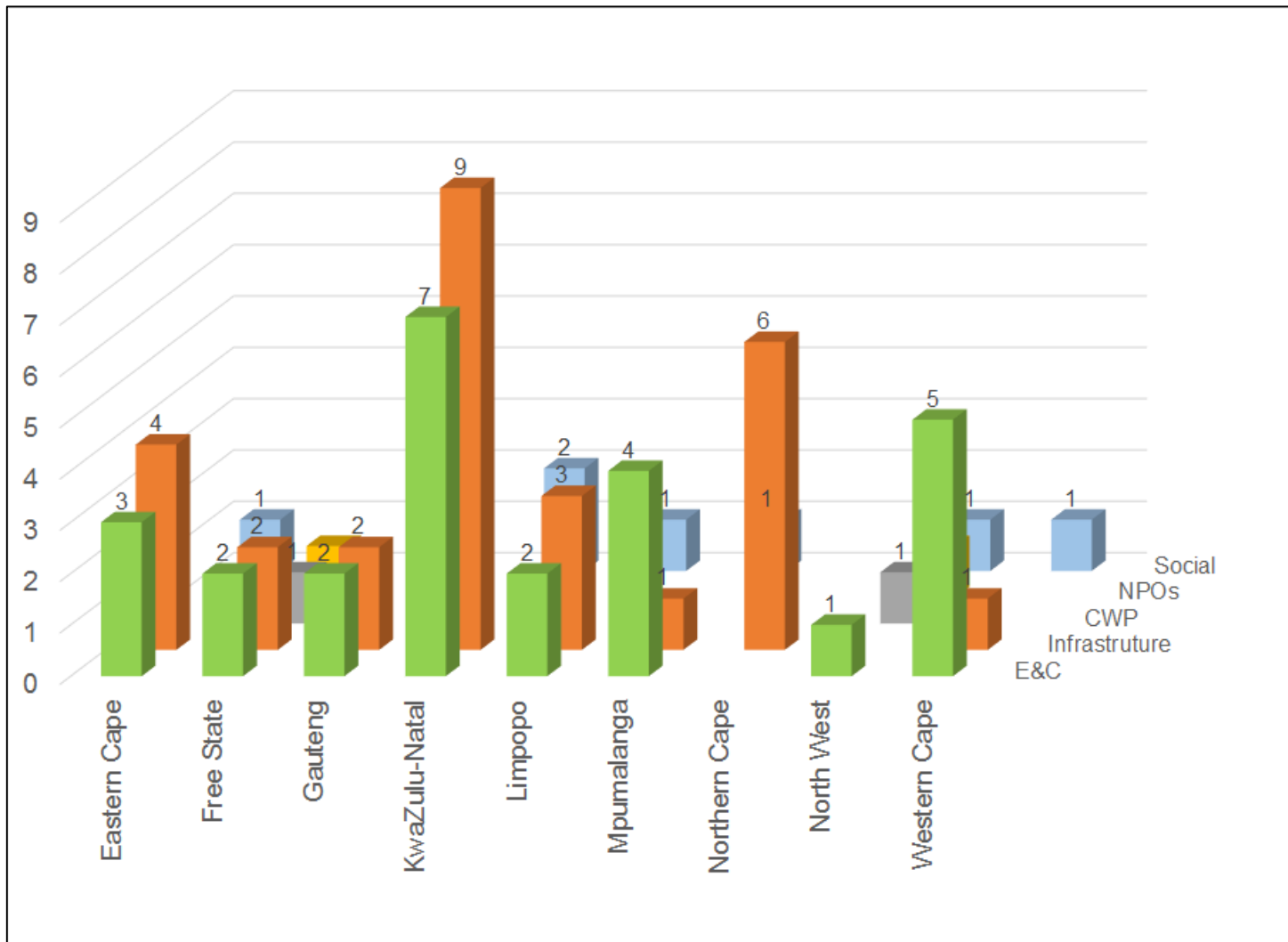
Provincial
Roadshows
August – Sept
2018
(Done in 5
provinces including
KZN, LP, MP, WC,
FS)

Presenting
Guidelines at
various workshops
and forums and
distribute
marketing
materials to all
stakeholders



EPWP 2017/18 Audit Outcomes

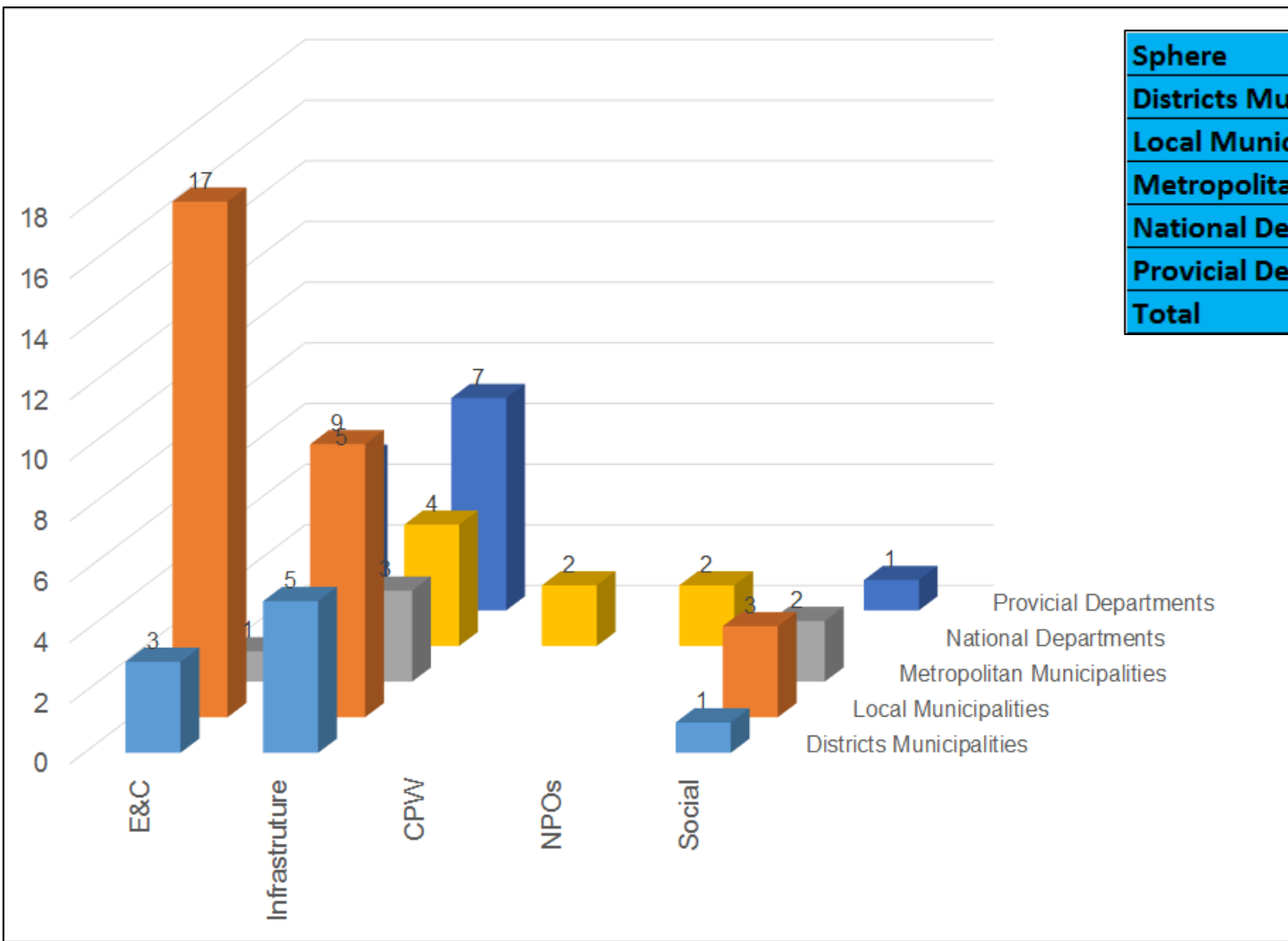
AGSA Sample: 2017-18 EPWP Final Audit



Province	Total
Eastern Cape	8
Free State	6
Gauteng	4
KwaZulu-Natal	18
Limpopo	6
Mpumalanga	6
Northern Cape	6
North West	4
Western Cape	7
Total	65

Sector	Total
E&C	26
Infrastructure	28
CPW	2
NPOs	2
Social	7
Total	65

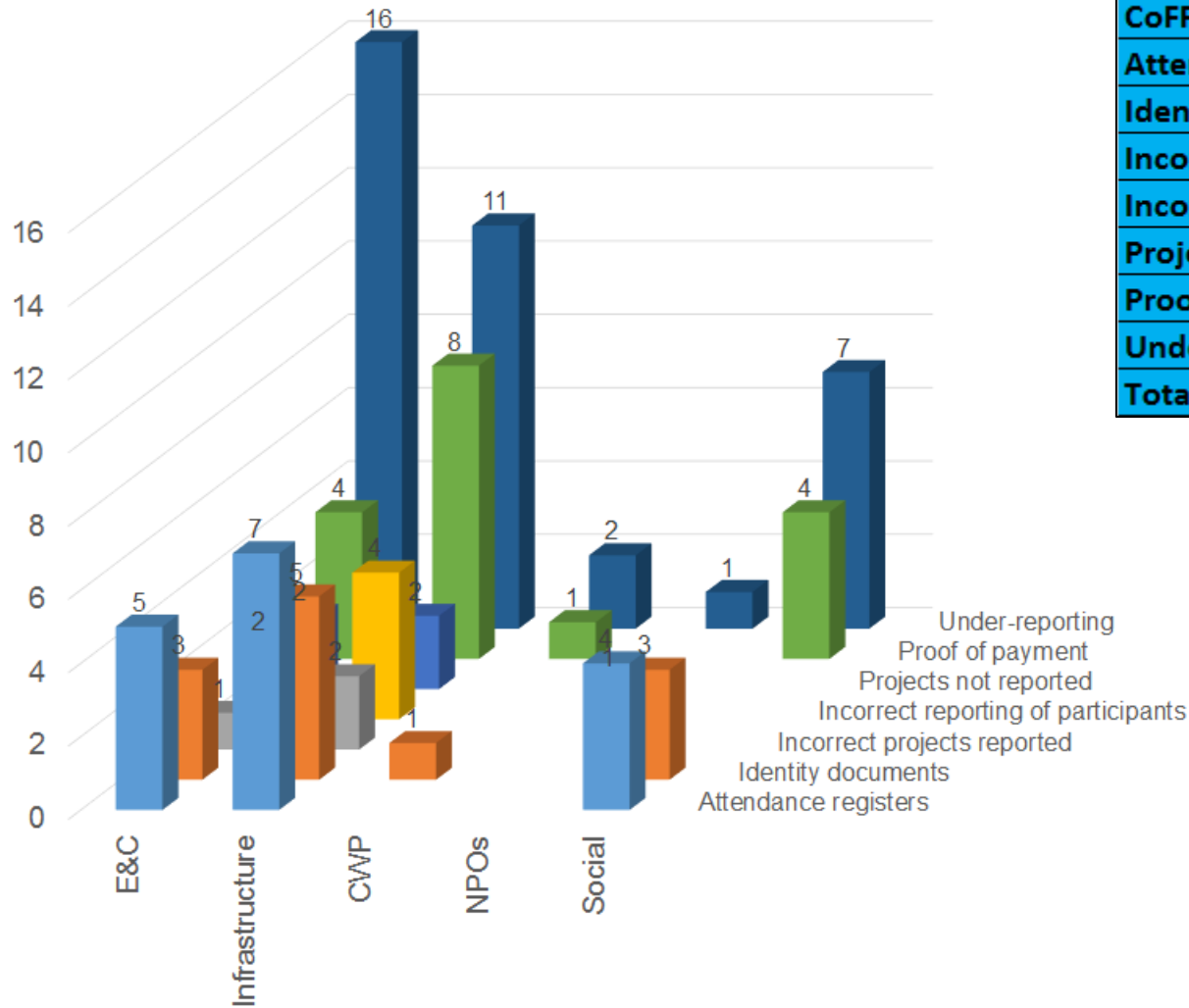
AGSA Sample: 2017-18 EPWP Final Audit



Sphere	Total
Districts Municipalities	9
Local Municipalities	29
Metropolitan Municipalities	6
National Departments	8
Provincial Departments	13
Total	65

Sector	Total
E&C	26
Infrastructure	28
CPW	2
NPOs	2
Social	7
Total	65

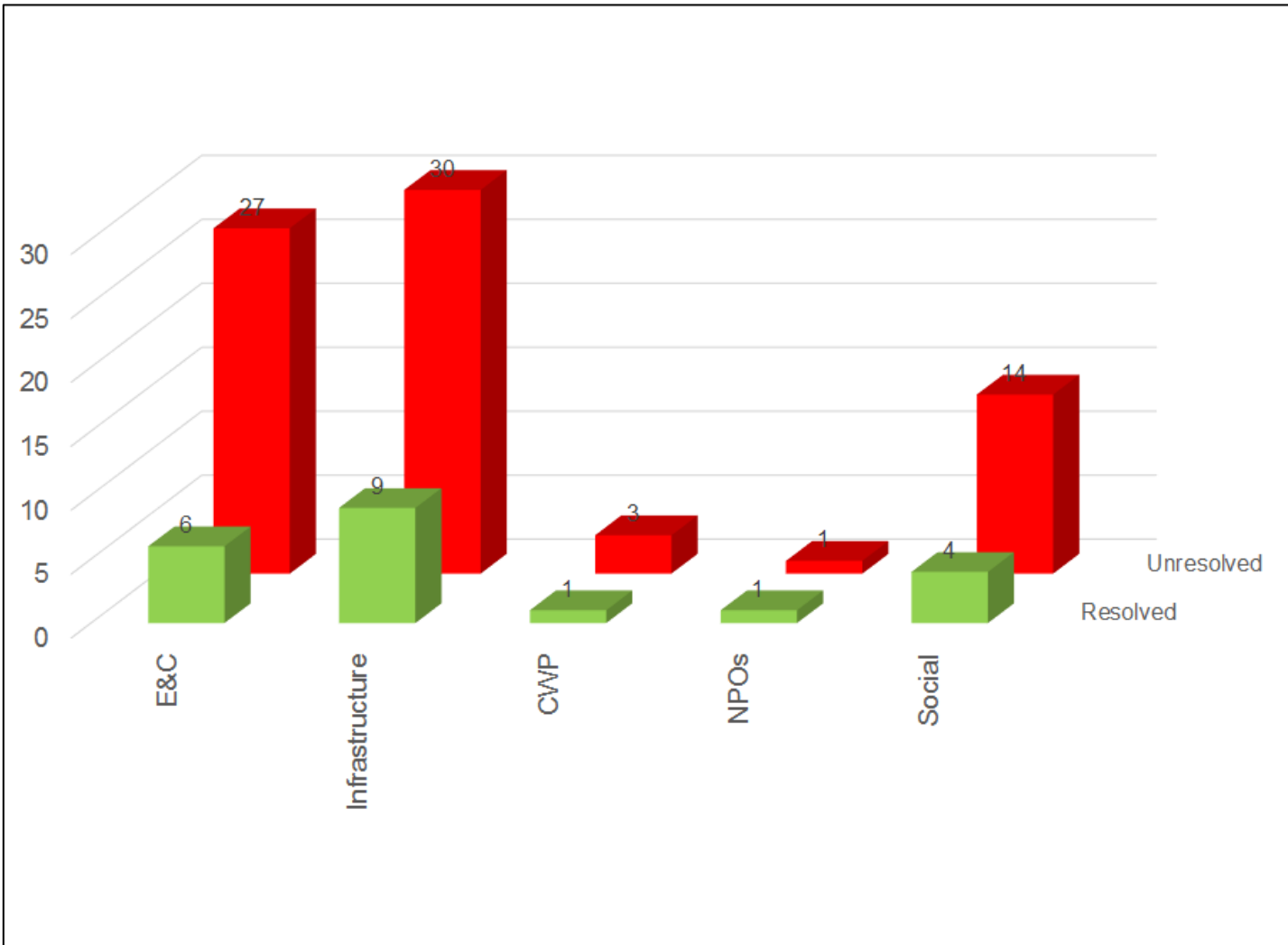
CoFFs for 2017-18 EPWP Final Audit: All Provinces



CoFF Subject	Total
Attendance registers	16
Identity documents	12
Incorrect projects reported	3
Incorrect reporting of participants	7
Projects not reported	4
Proof of payment	17
Under-reporting	37
Total	96

Sector	Total
E&C	33
Infrastructure	39
CWP	4
NPOs	2
Social	18
Total	96

CoFFs for 2017-18 EPWP Final Audit: All Provinces



Status	Total
Resolved	21
Unresolved	75
Total	96

Sector	Total
E&C	33
Infrastructure	39
CWP	4
NPOs	2
Social	18
Total	96

Nature of AGSA findings for EPWP

AGSA Finding	Root Causes	Internal Controls
<ol style="list-style-type: none"> 1. Participants not reported in the EPWP data produced from the EPWP-RS. 2. Some Participants reported in the EPWP-RS have not worked on the project for the relevant financial year. 	<ol style="list-style-type: none"> 1. The EPWP guidelines in terms of reporting not followed by the public bodies. 2. Beneficiary lists and attendance registers were not regularly reviewed to ensure that all participants are correctly captured on EPWP reporting system. For this to happen, the DPW relies on the public body. 	<ol style="list-style-type: none"> 1. The EPWP-RS has functionality that continuously report to public bodies those participants who do not pass validation. The public body was equipped to ensure that all valid participants are approved and reported on the system. 2. The EPWP-RS is a reporting system. Validations on the compliance and internal consistency of captured data is possible, but under-reporting or the incorrect reporting of participants can only be detected through actual site visits by the Department. The Department does not have the funds and the required human resource to monitor all the reported projects continually through site visits. 3. Whether site visits take place or not, proper record-keeping and oversight is an administrative responsibility of the public body.

Nature of AGSA findings for EPWP

AGSA Finding	Root Causes	Internal Controls
<p>2. Project files do not have a clear copy of the certified identity document for all participants.</p>	<p>1. Proper record-keeping practices were not followed to ensure that participants are compliant and can be reported on the EPWP-RS. The Department relies on the public body for this.</p>	<p>1. The securing of certified ID copies is an administrative function for which the Department relies on the public body.</p> <p>2. Public bodies have been advised to ensure that the requirement for certified ID copies are written into contracts with service providers.</p>

Nature of AGSA findings for EPWP

AGSA Finding	Root Causes	Internal Controls
<p>3. Employment contracts were not in place or not signed by all parties.</p> <p>4. All the required signed and verified attendance registers were not in place.</p> <p>5. All the required proofs of payment were not in place.</p>	<p>1. Record-keeping and oversight was not implemented. The Department relies on the public body for this.</p> <p>2. Poor management of service providers by the public body underlies many of these cases.</p>	<p>1. Inadequate record-keeping or oversight by public bodies can only be detected through actual site visits by the Department. The Department does not have sufficient capacity (funds and HR) to monitor all the reported projects continually through site visits.</p> <p>2. Whether site visits take place or not, proper record-keeping and oversight is an administrative responsibility of the public body.</p>

Nature of AGSA findings for EPWP

AGSA Finding	Root Causes	Internal Controls
<p>6. All valid projects were not reported on the EPWP RS.</p>	<ol style="list-style-type: none"> 1. The EPWP guidelines in terms of requesting a change in the list of projects that are funded by grants are not always followed by the public body. 2. Transfers are based on in-year monitoring reports to National Treasury, not financial data reported on the EPWP RS. It is verified if the public body has reported some of the projects on the list of projects that are funded by grant, not all. This is due to the quality of the financial data reported on the EPWP RS and the high rate of cancellation of projects by public bodies. 3. For MIG-funded projects, public bodies may not implement or report projects due to internal issues ranging from lack of capacity to conflict with service providers. 	<ol style="list-style-type: none"> 1. There is an established process to be followed by a public body for requesting a change in the list of projects that are funded by grants. 2. Public bodies are engaged in monthly meetings to ensure the reporting of all valid projects.



Action plan to resolve audit issues

Objective	Target
1. Realign monitoring through site visits to focus on compliance issues.	<ol style="list-style-type: none">1. Transform current “site visits” into “public body visits”, focused solely on ensuring compliance and managed by EPWP M&E.2. The visits are to be done to the implementing public body and to have the format of an audit focusing on issues identified by both Internal Audit and AGSA.3. The public bodies to be visited to be sampled by EPWP M&E with strict adherence to the sample.4. Accounting Officers are to be immediately notified of findings picked up during this public body visits.5. Development of early-warning criteria by EPWP M&E to direct sampling for project visits.

Action plan to resolve audit issues

Objective	Target
2. Ensure the resolution of identified compliance issues.	<ol style="list-style-type: none"><li data-bbox="537 344 1845 572">1. Administration of an intervention register by EPWP M&E to ensure the resolution of all compliance issues identified in the project visits through the allocation of responsibility (to Sector Managers or Programme Managers) and timelines.<li data-bbox="537 586 1845 686">2. Non-resolution of compliance issues within a reasonable timeframe to translate into action taken for the public body.

Action plan to resolve audit issues

Objective	Target
3. Ensure integrity of lists of grant-funded projects.	<ol style="list-style-type: none"><li data-bbox="537 347 1835 668">1. Resubmission of lists of grant-funded projects by the public bodies for which not all such projects have reported by the end of the third quarter, to ensure that these lists have not been changed unilaterally by the public body.<li data-bbox="537 689 1835 796">2. Ensure POE of engagement with public bodies to ensure the reporting of all valid projects.

Thank you very much for your attention

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