



Submission on the Draft White Paper on the Police and the Draft White Paper on Safety and the Draft White Paper on Safety and Security

27 March 2015

A. Introduction

1. The Civil Society Prison Reform Initiative (CSPRI) is a project of the Community Law Centre (CLC) at the University of the Western Cape (UWC). In response to a clearly identified need for research-based advocacy on prisoners' rights and criminal justice reform in South Africa and the African continent, CSPRI was established in 2003.
2. We thank the Civilian Secretariat for Police for the opportunity to comment on the two Draft White Papers. We see the drafting and tabling of the two Draft White Papers as an opportune moment to reflect on the state of crime reduction and policing in the country, in particular considering the remaining high levels of violent crime in particular, and an increasing perception of police corruption and inefficiency.

B. Ideal content of a White Paper

3. Good governance practice requires a White Paper to contain two general dimensions: (i) the outline of the problem and (ii) the government's proposed solution to the identified problem(s), in the form of policy. Furthermore, a White Paper will often, although not systematically, lead to legislative change or adoption of new legislation in order to enable the effective implementation of the policy recommendation made in the White Paper, and must therefore be able to facilitate the adoption of such legislation. CSPRI submits that neither the Draft White Paper on Safety and Security (DWSS)

nor the Draft White Paper on the Police (DWPP) sufficiently or comprehensively contain both dimensions.

4. This submission will draw on the nine features of modern policy-making, as defined and developed by the UK government, described below.¹ Space does not allow for a full discussion and attention but merely draws to them for the purpose of this submission.

5. *Forward-looking*: The policy-making process results in clearly defined outcomes that the policy is designed to achieve and takes a long-term view (five years), based on statistical trends and informed predictions of social, political, economic and cultural trends and the possible effect and impact of the policy.

6. *Outward-looking*: National, regional and international influencing factors are taken into account, as are experiences from other countries. It also assesses how the policy will be communicated to the public and stakeholders.

7. *Innovative, flexible and creative*: Flexibility and innovation characterises the policy-making process. Critically examining established ways of dealing with problems is encouraged as well as developing creative solutions. The process is open to comments and suggestions of others, and risks are identified and actively managed.

8. *Evidence-based*: Decisions of, and advice to, policy makers is based upon the best available evidence from a wide range of sources, and all key stakeholders are involved at an early stage and throughout the policy's development. All relevant evidence, including that from specialists, is available in an accessible and meaningful form to policy-makers. Key points of an evidence-based approach to policy-making include: reviewing existing research; commissioning new research; consulting relevant experts and/or use of internal and external consultants; and considering a range of properly costed and appraised options.

9. *Inclusive*: The policy-making process directly involves key stakeholders to take account of the impact on and/or meet the needs of all people directly or indirectly affected by the policy. An inclusive approach may include the following aspects: consulting those responsible for service delivery and implementation; consulting those at the receiving end or otherwise affected by the

¹ H Bullock, J Mountford, and R Stanley, (2001) *Better Policy-Making*, London: Centre for Management and Policy Studies.

policy; carrying out impact assessments; seeking feedback on the policy from recipients and front line deliverers.

10. *Joined-up*: The process takes a holistic view by looking beyond institutional boundaries to the government's strategic objectives and seeks to establish the ethical, moral and legal base for policy. There is consideration of the appropriate management and organisational structures needed to deliver cross-cutting objectives.

11. *Review progress*: Existing and established policy is constantly reviewed to ensure it is really dealing with problems it was designed to solve, taking account of associated effects elsewhere. Aspects of a reviewing approach to policy-making include: an ongoing review programme is in place with a range of meaningful performance measures; mechanisms to allow service deliverers and customers to provide feedback direct to policy-makers are set up; and redundant or failing policies are scrapped.

12. *Evaluation*: Systematic evaluation of the effectiveness of policy is built into the policy making process. Approaches to policy-making that demonstrate a commitment to evaluation include: a clearly defined purpose for the evaluation is set at outset; success criteria are defined; means of evaluation are built into the policy making process from the outset; and pilot projects are used to influence final outcomes.

13. *Learns lessons*: The process learns from experience of what works and what does not. A learning approach to policy development includes the following: information on lessons learned and good practice is disseminated; there is an account available of what was done by policy-makers as a result of lessons learned; there is a clear distinction drawn between failure of the policy to impact on the problem it was intended to resolve and managerial/operational failures of implementation.

14. In summary, it is concluded that good policy-making commences with a thorough understanding of the problem and society's needs; attention is paid to the process of policy-making, a process emphasising inclusivity while maintaining a forward- and outward-looking perspective that is outcome-focused and knowledge-based.² In contrast, poor public policy-making is “an *ad hoc* or

² R. Curtain, (2000) Good Public Policy Making: How Australia Fares, *Agenda: A Journal of Policy Analysis and Reform*, Vol. 8 No. 1, p. 36.

short-term policy response to an immediate problem. Poor policy making often results from unintended consequences that a piecemeal approach has not taken into account”.³

DWPSS is evidence-based but weak on policy

15. The DWPSS certainly attempts to comprehensively outline the problems South Africa faces in addressing crime in South Africa, by providing a comprehensive understanding of crime prevention in general, crime statistics in South Africa, and listing other relevant policy documents that have been adopted since 1994. However, it fails to outline clear policy recommendations or to identify which national government departments are responsible for implementing policy.

16. Furthermore, the DWPSS refers to previous policy documents adopted, but omits to assess the level of implementation of these policy documents and possible lessons to be learnt. Without a comprehensive assessment of the state of implementation of these various policy documents, the DWPSS therefore struggles to make tangible and realistic policy recommendations for the future of safety and security in the country. It is also unclear how the DWPSS sees how the array of existing policy documents will feed into future policy on safety and security.

DWPP contains policy but not evidence-based

17. The DWPP, on the other hand, contains policy recommendations, but fails to outline the problem, i.e. fails to ground its recommendations into solid evidence and knowledge. It therefore constitutes policy that is not knowledge-based. Policy that is not knowledge-based is bound to fail at improving an institution, especially when the institution is in crisis, which is the case of the South African Police Service (SAPS).

18. The clearest indication that the DWPP is not evidence-based is found in Chapter 6 of the DWPP.

19. Chapter 6 of the DWPP recommends the compilation of a “State of the Police Report” and of an internal audit to better understand the systemic challenges faced by the police. The DWPP already highlights several of these systemic challenges, by identifying the areas that should be covered by

³ R. Curtain, (2000), Good Public Policy Making: How Australia Fares, *Agenda: A Journal of Policy Analysis and Reform*, Vol. 8 No. 1, p. 38.

both the Report and the internal audit. However, the DWPP also indicates that it does not know the full nature, characteristics or extent of the crisis. The DWPP therefore invites for further research in order to understand its causes and the responses needed. Despite this, the DWPP dedicates in its first five chapters to making extensive policy recommendations on the future of policing in the country. To CSPRI, this is an illogical approach; a case of putting the cart before the horse. If the intent is for this White Paper to provide overall strategic direction on policing and improve police services in South Africa, policymakers should first understand the problem (by conducting the necessary research) before making policy recommendations. The outcome of the State of the Police Report and the internal audit may lead to the realisation that the policy recommendations contained in the current DWPP are inadequate to address the systemic functional crisis faced by SAPS. The question then is whether there will be sufficient momentum to re-draft the White Paper at that stage. Conducting such research could have at best followed the Green Paper on Policing, but should certainly precede the drafting and adoption of the White Paper.

20. CSPRI welcomes the recommendation of the DWPP to compile a “State of the Police Report” and an internal audit, and sees them as indispensable to better understand these systemic challenges. CSPRI hopes that this research will be conducted in an open and transparent manner, that those conducting the research will be allowed to address all relevant issues, and that the outcome of the two reports will be made public. The DWPP calls for better public access to policing information, and this would be a first implementing measure of this particular policy recommendation contained in the DWPP.

21. A further indication that the DWPP is not evidence- or knowledge based is the fact that the DWPP contains no references or bibliography. The DWPP should model itself on the extensive references and the Appendix contained in the DWPSS.

22. Therefore, CSPRI recommends that the DWPP in its current form be put aside until the State of the Police Report is drafted and circulated, and the internal audit is conducted.

23. It would be regrettable if the DWPP was adopted now and the State of the Police Report and internal audit were conducted at a later stage, but without resulting in the adoption of a new White Paper. As a comparison, the report of the Judicial Commission of Inquiry into Allegations of Corruption, Maladministration and Violence in the Department of Correctional Services (2006) (the Jali Commission) highlighted numerous systemic deficiencies in the operations of the Department of Correctional Services (DCS). However, the recommendations of the Jali Commission were not fully adopted by DCS senior management, and resulted in insufficient policy changes and practices. The

systemic challenges faced by DCS today remain largely the same as the ones faced before the Jali Commission was put in place. It would be unfortunate if the State of the Police Report were to meet the same faith.

Draft White Papers not rooted in realities

24. Because the DWPSS does not assess the successes and challenges of previous safety and security or crime prevention policies, and the DWPP is not evidence-based, neither are rooted in the realities of crime prevention (and its failures) or of current policing challenges. Furthermore, the DWPSS should recognise that crime prevention currently does not constitute a government priority, as is reflected in its constant crime-combating rhetoric (“kill the bastards”, “shoot the bastards”, “barbarians in our midst”) and in the adoption of the National Crime Combating Strategy. Similarly, police culture today is conceptualised as a “force” (the DWPP refers to a “police force” in several instances) which is at “war” with criminals. With this mind-set, it becomes difficult to instil a human rights culture in police conduct, or to build positive police-community relationships, and is also at odds with the National Develop Plan recommendation to demilitarise the police. Therefore, both Draft White Papers should, from the outset, recognise that a fundamental change of mind-set on the part of national government and senior police management in approaching crime and policing is needed in order to fulfil the recommendations contained in the respective Draft White Papers.

25. Furthermore, neither Draft White Papers examine the violent nature of South African society and the way in which it impacts on crime prevention and crime combating. Physical and psychological violence has been part and parcel of our society at least since the beginning of colonisation, and was institutionalised under Apartheid. The discrimination and oppression that Whites imposed on Blacks in the country over centuries has deeply affected the way in which we see each other in society today still, across racial and class lines. The psychological consequences of this discrimination and oppression, resulting in today’s high levels of inequality, has in turn shaped our relationship to violence and masculinities in society.⁴ CSPRI submits that both White Papers would greatly benefit from recognising, and calling for further research into, this issue. Both White Papers should also call for a broader national conversation on violence in our society, and call for effective political support into such conversation.

⁴ D Foster “Gender, Class, ‘Race’ and Violence” in C. Ward, A. van der Merwe and A. Dawes (Eds.), *Youth Violence Sources and Solutions in South Africa*, University of Cape Town Press, 2013, pp. 23-51.

C. Specific comments on the Draft White Paper on Safety and Security

26. As noted in the previous section, the DWPSS is evidence-based but contain insufficient clear and concrete policy recommendations to lead to effective change generated by the White Paper. Also, it fails to identify which national government departments would be in charge of safety and security. Finally, it fails to identify the successes or challenges in implementing previous similar or interrelated policy documents (all cited in the DWPSS), which would then ideally inform the content of this DWPSS. In particular, neither the National Crime Prevention Strategy nor the Seven-Point Criminal Justice System Transformation Plan currently enjoy prioritised government support. One may even question the relevance of the National Development Plan in today's government thinking. If the DWPSS wishes future policy to be based on these older policy documents, it should acknowledge the need to shift government priorities towards these documents and their policy recommendations.

SAPS absent from the White Paper

27. It is regrettable that the DWPSS contains no reference to SAPS, in particular considering that it appears to root its content into the National Development Plan.⁵ The latter recommends that SAPS play an integral part into crime prevention and CSPRI submits that SAPS the DWPSS should reflect this.

Crime statistics

28. CSPRI questions why the DWPSS dedicates such length outlining crime statistics. In a white paper on crime prevention, outlining crime statistics should allow the reader and policymaker to better understand the factors behind the commission of crime. However, and whereas sections 4.1 to 4.5 of the DWPSS address some causes of crime, these sections do not speak to section 4.6. The latter simply outlines the crime situation in the country, without much analysis of causes. This is rather unhelpful for future policymaking. Also, a White Paper, in order to speak to future policy, should analyse trends in the commission of crime over a substantive time period (ideally, since reliable crime statistics are available in the country). The DWPSS only looks at statistics over the past 2 or 3 years. This information is insufficient to inform policymaking.

⁵ NDP, p. 393.

Data collection

29. The DWPSS insists, in several places, on the importance to collect data in order to monitor safety and crime. CSPRI is fully supportive of this recommendation. However, the DWPSS fails to clearly identify which institution(s) would be in charge of collecting and disseminating relevant data. Without such identification, it is highly unlikely that the necessary data collection will take place.

Constitutionality and legality of the role of local government

30. Section 6.3.3 of the DWPSS sets out proposed functions for local government to perform in order to improve safety and security. While this is laudable, it is also common cause that the overwhelming majority of local governments are not able or are struggling to perform the most basic of functions, such as providing water, sanitation, infrastructure maintenance and so forth. Moreover, many local governments are struggling to meet the principles of good governance and sound financial administration. For example, in 2012/13, only 9% of municipalities received a clean audit from the Auditor General.⁶ It is precisely the dissatisfaction with basic service delivery that lies at the heart of the growing number of public protests across South Africa; a phenomenon that is increasingly (and incorrectly) defined as a safety and security problem in the DWPP. The extent to which local governments are able to make a contribution to safety and security, as outlined in the DWPSS, is seriously in doubt. CSPRI submits that local government should focus on its core functions and that that will of itself make a meaningful contribution to safety and security.

31. Furthermore, the proposed functions outlined in section 6.3.3 do not form part of local government's core functions and this may therefore be at odds with the Constitution and the Municipal Systems Act.⁷ The functions of local government are set out in Schedule 4 (Part B) and Schedule 5 (Part B) to the Constitution and are not necessary to repeat here.

D. Specific comments on the Draft White Paper on the Police

32. As noted above, the DWPP contains policy recommendations but fails to base these recommendations in research and evidence. By recommending to draft a State of the Police Report

⁶ 'Clean audits for just 9% of SA's municipalities', *Mail and Guardian*, 30 July 2014, <http://mg.co.za/article/2014-07-30-clean-audits-for-just-9-of-sas-municipalities>

⁷ Municipal Systems Act (32 of 2000), s. 10.

and to conduct an internal audit, it acknowledges that it does not fully grasp the systemic challenges currently faced by SAPS. In the latter situation, it is unwise and unreasonable to draft policy recommendations.

33. Furthermore, the DWPP does not contain any references, bibliography or a list of legislation and policy documents used to support the Draft White Paper. CSPRI submits that the DWPP would be greatly enhanced if it contained such referencing material.

34. Of particular concern to CSPRI is the following sentence, taken from the DWPP: “The current philosophy that informs policing however is under threat. As our fledgling democracy experiences challenges based on both genuine frustrations related to service delivery as well as more orchestrated efforts to create domestic instability policing is less willing to be subjected to civilian oversight”.⁸ It is unclear on the basis of which facts and evidence the Civilian Secretariat for Police makes these worrying claims, which should be supported with a reference.

35. CSPRI submits that a high quality and independently researched and drafted State of the Police Report and internal audit will conclude that SAPS faces a systemic crisis that requires urgent government action and a major shift in the way in which policing is conducted in the country, as well as in government’s attitude and rhetoric towards crime combating and crime prevention. It will also show the absence of a human rights culture in the Standing Orders for the South African Police and National Instructions, as well as in general police conduct. These are some elements which would then need to receive an appropriate policy response in the form of a completely redrafted White Paper on Policing.

36. Faced with this situation, CSPRI submits that setting up a judicial commission of inquiry into the state of policing in South Africa will be imperative in order to address the systemic challenges highlighted in the DWPP, in this submission and in other submissions made on the DWPP.

37. The DWPP also recommends the adoption of a “plan of action that clearly articulates key deliverables against a given time-frame”.⁹ CSPRI submits that this plan of action should be contained in the White Paper, and not follow it.

⁸ Civilian Secretariat for Police, *Draft White Paper on the Police*, Government Gazette no. 38527, pp. 8-9.

⁹ Civilian Secretariat for Police, *Draft White Paper on the Police*, Government Gazette no. 38527, p. 37.

Aim of the Draft White Paper on the Police

38. The Preamble to the DWPP states that the aim of the DWPP is to “provide an enabling legislative framework for civilian oversight and align the police service to the rest of the public service”. CSPRI has been unable to locate any substantial statements or findings in the DWPP that relate to these two goals. They appear to have been left in the preamble, without being reflected upon in the body of the White Paper.

Crime Prevention absent from the White Paper

39. CSPRI noted in the previous section that SAPS was absent from the DWPP. Again, CSPRI wishes to emphasise the need to see SAPS as part of crime prevention initiatives, which is currently absent from the DWPP. The two Draft White Papers address several inter-related issues, but there are currently insufficient linkages between the two Draft White Papers. SAPS appears to perceive itself as being able to operate in silos from other criminal justice actors and government departments able to intervene in crime prevention initiatives. CSPRI urges the Civilian Secretariat to reconsider this approach and build more bridges between the two Draft White Papers.

Accountability

40. The DWPP suggests that SAPS is a highly accountable institution, which complies with recommendations made by the different institutions it is accountable to. CSPRI submits that the reality is different, and that SAPS officials enjoy very high levels of de facto impunity. CSPRI conducted extensive research on the matter, concluding that the legislation and institutions put in place to address impunity by law enforcement officials are in effect not functioning.¹⁰

41. An indication of the high levels of impunity enjoyed by SAPS officials is the very low proportion of recommendations made by the Independent Police Investigative Directorate (IPID) that result in dismissal following internal disciplinary action or in a criminal conviction and sentence of imprisonment not suspended and without the option of a fine following a recommendation for prosecution. Over the period 2009/10 to 2013/14, between 0.2% and 2.3% of IPID recommendations

¹⁰ Muntingh and Dereymaeker, *Understanding impunity in the South African law enforcement agencies*, CSPRI Research report (2013). Available at <http://cspri.org.za/publications/research-reports/understanding-impunity-in-the-south-african-law-enforcement-agencies>

for disciplinary action resulted in dismissal. Over the same period, between 1.6% and 4.9% of IPID recommendations for prosecution resulted in a sentence of imprisonment not suspended and without the option of a fine.¹¹ These figures clearly show that SAPS officials are not effectively held accountable for the violations they commit.

42. Another indication of high levels of impunity is the fact that despite the fact that so few officials are being held individually accountable for their actions, courts continue to hold the Minister of Police liable to pay large sums in damages to victims of police abuse. Indeed, beyond the fact that SAPS appears to be unable to manage the large number of claims pending against it (and currently sits with a contingent liability budget of over R20 billion, about a third of SAPS' budget), SAPS has made pay-outs for all claims made against it to the value of over R800 million over a seven-year period, from 2007/08 until 2013/14. Furthermore, there has been a 660% increase in pay-outs over the same period (from R38.2 million in 2007/08 to R251.2 million in 2013/14), whereas amounts claimed have (only) increased by 390% (from R1.5 billion in 2007/08 to R5.9 billion).¹² This indicates that claims are increasingly substantiated and/or result in higher pay-outs, possibly explained by the increasing violent nature of the reason for the claim. Virtually none of these amounts have been paid out by the officials themselves.

43. Unfortunately, the DWPP does not recognise this culture of impunity. An indication of the lack of understanding by the DWPP of the needs for reinforced accountability is the fact that it identifies IPID as the institution in charge of investigating police misconduct. The Independent Complaints Directorate was in charge of investigating police misconduct, but this was taken away from the independent oversight body when IPID was created, with the aim to focus IPID's mandate on the most serious crimes that can be committed by police officials. Today, misconduct and minor offences are only investigated and punished through SAPS internal disciplinary mechanisms. However, penalties imposed through internal disciplinary processes are often too light to effect change in the individual's conduct. Furthermore, there is no system in place that would allow SAPS to identify trends in police misconduct, and address these through adequate policy. This would be the role of Civilian Secretariat for Police. Overall, the fact that the IPID no longer investigates misconduct has the effect of allowing police officials to repeatedly commit such misconduct without being

¹¹ ICD 2009-10 Annual Report, pp. 69-130; ICD 2010-211 Annual Report, pp. 28-45; IPID 2011-12 Annual Report, pp. 25-41; IPID 2012-13 Annual Report, pp. 15-68; IPID 2013-14 Annual Report, pp. 27-64.

¹² SAPS 2007-08 Annual Report, p. 218; SAPS 2008-09 Annual Report, p. 216; SAPS 2009-10 Annual Report, p. 190; SAPS 2010-11 Annual Report, p. 190; SAPS 2011-12 Annual Report, p. 201; SAPS 2012-13 Annual Report, p. 257; SAPS 2013-14 Annual Report, p. 336.

adequately sanctioned, and constitutes a breeding ground for the commission of more serious offences, which are then investigated by IPID. But again, these latter offences are not sufficiently adequately punished either, as highlighted above.

44. Considering all the above, CSPRI would recommend that the lack of accountability within SAPS constitute one of the “specific areas for research” which the DWPP identifies as being needed to review and amend legislation and regulations, and be addressed in the State of the Police Report, and by the recommended commission of inquiry.

Professionalization of the Police and a Single Police Service

45. The DWPP recommends that a professional police service will be reached, among others, through the establishment of a single police service. CSPRI submits that a single police service will do nothing to professionalise the police. Professional policing will be reached through better original and continuous training of police officials, political support to non-violent policing, reinstating specialised police services, fighting corruption within SAPS and holding both individual police officials and their managers to account.

46. Furthermore, CSPRI submits that there exists no constitutional imperative for a single police service. The wording “single” in section 199(1) of the Constitution, read in conjunction with 205(1) of the Constitution, aimed at uniting the former South African Police with the police forces in the Bantustans, but maintained space to create municipal police services, operating relatively independently from SAPS.

Crowd control and service delivery protests

47. In several places, the DWPP refers to violent service delivery protests as one of the main challenges that the police currently faces. CSPRI submits that the DWPP misunderstands the issue of violent service delivery protest.

48. Service delivery protests very often become violent as a result of the frustration and anger expressed by demonstrators following the lack of action from municipal officials in providing services or following a lack of engagement on their concerns. Therefore, the adequate policy recommendation to addressing violent service delivery is to address corruption and the lack of efficiency in municipalities, rather than providing additional training to police to respond to violent

service delivery protests. Providing additional police training will not address the root causes of service delivery protest turned violent, nor will it make the problem go away. On the contrary, more forceful responses by police to these expressions of popular anger and frustration risks leading to a weakening of trust in institutions of government, including the police.

Sources used in the DWPP

49. As noted in the first section, the DWPP does not contain reference or a bibliography, which raises serious doubts regarding the basis on which the DWPP was drafted. As indicated above, policy that is not knowledge-based is bound to fail.

50. Similar to the DWPSS, the DWPP refers to some policy which no longer enjoys prioritised government support. This is the case in particular of the National Crime Prevention Strategy, the Seven-Point Plan and possibly the National Development Plan. If the DWPP wishes future policing policy to be based on these older policy documents, it should acknowledge the need to shift government priorities towards these documents and their policy recommendations.

51. Furthermore, CSPRI submits that some sources are severely lacking from the DWPP. Firstly, the SAPS National Crime Combating Strategy has guided policing since the early 2000s, but no reference of this document is made in the DWPP. This needs clarification. Secondly, the report of the Marikana Commission of Inquiry will highlight some of the systemic challenges that the SAPS faces. This report should also inform a White Paper on policing, the State of the Police Report, internal audit and eventually the recommended commission of inquiry into the state of policing. It would be ideal if the DWPP would be re-drafted shortly following the publication of the report of the Marikana Commission of Inquiry, but also following the State of the Police Report, in order to build on the momentum created by the policy recommendations contained in both reports. Thirdly, CSPRI notes that the DWPP does not seem to have reflected on the policy recommendations contained in the Report of the Commission of Inquiry into Allegations of Police Inefficiency and a Breakdown in Relations between SAPS and the Community of Khayelitsha (2014). Some of its recommendations are only relevant to the Khayelitsha area in the Western Cape, but others are relevant to policing nationwide. Finally, the adoption of the Prevention and Combating of Torture of Persons Act (13 of 2013) criminalises torture and puts a series of obligations on SAPS in order to ensure that its staff does not commit acts of torture and other ill-treatment in the exercise of their duties. Reference to

this legislation, as well as all other legislation directly applicable to SAPS' mandate, would reinforce the knowledge-based dimension of the DWPP.

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