



ANTI-CORRUPTION, STOLEN ASSET RECOVERY AND CIVIL SOCIETY IN SOUTH AFRICA

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KEY MESSAGES

- Political interference, and poor collaboration in the South African criminal justice system over the last few years have hindered the effectiveness of anti-corruption agencies and undermined their ability to uphold the rule of law.
- After revelations of close connections between South African high-level politicians and a small group of business people, resulting in favourable contracts for the latter, grand corruption in the country is being investigated on an unprecedented scale.
- The Asset Forfeiture Unit (AFU) and Investigating Directorate (ID), both located within the National Prosecuting Authority, are central to the country's asset recovery efforts through seizing the proceeds of crime.
- Confiscated monies and property are deposited into the Criminal Assets Recovery Account (CARA), which then funds projects with the proceeds or directly compensates the victims of economic crime.
- The application of non-conviction-based-forfeiture has enabled authorities to initiate proceedings against the Gupta family and their business associates, with the value of the assets in South Africa estimated at USD 36,5 million.
- While only a few organisations have to date been extensively engaged in asset recovery, civil society is becoming increasingly active in this area.

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ANTI-CORRUPTION OVERVIEW

South Africa presents somewhat of a paradox in its fight against corruption. It is characterised by a robust institutional, legal and policy anti-corruption framework. However, the country's reputation as one of Africa's economic hubs has been tarnished by persistent levels of corruption, on both a grand and administrative scale. Corruption in South Africa has dominated public procurement and state-business relations to an extent that it has reached a level of state capture, when those in power use corruption to influence a country's policies, legal environment, and economy to benefit their own interests.

Since 2010, South Africa has not received a score higher than 45 (out of 100) on Transparency International's Corruption Perceptions Index (CPI),¹ indicating consistent higher levels of perceived corruption. The country scored 44 on the 2020 CPI. Other measures of corruption indicate a worsening trend over time. For example, despite the country's levels of petty corruption being one of the lowest in Sub-Saharan Africa, Transparency International's 2019 Global Corruption Barometer shows that bribery rates in the country increased by approximately 11% between 2015 and 2019. In other words, there was an increase in the number of people who reported having to pay a bribe in order to access or benefit from public services, such as water or electricity utilities, public schools, health centres, and receive police assistance or avoid problems with the police (e.g. traffic fine).²

Although South Africa fares relatively well on the 2020 Basel Anti-Money Laundering Index, ranking 87th (out of 141 countries), which reflects moderate risk of money laundering and terrorist financing, the South African Revenue Service (SARS) warns that the country is at very high risk of illicit financial flows. SARS reports an increase

in the use of cross-border structuring and transfer pricing manipulations by businesses to illegally reduce their local tax liabilities, and that some of the largest companies listed on the Johannesburg Stock Exchange, including SAB Miller and Anglo American, have been implicated in tax avoidance matters relating to other countries.³ South African telecoms giant, MTN, has also been accused of draining the coffers of other African nations by shifting billions of Rand, for example, from its subsidiaries in Ghana (US\$ 401 million), Nigeria (US\$ 562 million), Uganda, and Cote d'Ivoire (US\$ 55.53 million) to offshore companies in Dubai and Mauritius.⁴

After revelations of close connections between high-level politicians and a small group of businessmen (resulting in favourable contracts for the latter), grand corruption in the country is finally being investigated. The ongoing Commission of Inquiry into allegations of state capture, corruption and fraud in the public sector, including organs of the state, demonstrates the extent to which corruption is deeply engrained in the country's political apparatus, where the lines between public and private interests have become increasingly blurred.

It is estimated that over USD 3.4 billion was spent by the state on contracts influenced by elements of state capture.

In one of the cases, the Free State Department of Agriculture and Rural Development awarded a contract to a company linked to the controversial Gupta family, with some of the funds (approximately US\$ 677,700) allegedly being laundered to a Gupta entity based in Dubai.⁵

ASSET RECOVERY IN SOUTH AFRICA

Several institutions play a role in South Africa's anti-corruption and asset recovery framework. Oversight agencies such as the Public Protector and National Prosecuting Authority (NPA) are enshrined in the Constitution of South Africa, while anti-corruption units such as the Special Investigation Unit (SIU) and the Financial Intelligence Centre were established by Acts of Parliament. The Asset Forfeiture Unit (AFU) and Investigating Directorate (ID), both located within the NPA, are central to the country's asset recovery efforts by seizing assets that are proceeds of crime or have been part of an offence through a criminal or civil process.⁶ Another important structure is the Anti-Corruption Task Team (ACTT), which was established in 2010 as an interdepartmental body mandated to fast-track high priority and high-profile corruption cases.

South Africa is party to several international agreements that provide for mutual legal assistance and cross-border co-operation. The country also possesses a wide array of legal and institutional mechanisms designed to combat corruption and strengthen its asset recovery programme. Two key pieces of legislation are dedicated to asset recovery in South Africa: The Prevention of Organised Crime Act (POCA), 1998, and the International Co-operation in Criminal Matters Act (ICCMA), 1996. In addition, one of the key objectives of the National Anti-Corruption Strategy (2020-2030) is to ensure that the country and its anti-corruption agencies can effectively collaborate with other countries and international bodies to prevent corruption, money laundering, bring corrupt persons to account, and secure convictions and asset recovery.⁷

The POCA provides that property obtained by means of criminal activities may be

forfeited to the State. It was introduced as a measure to combat, amongst others, organised crime, money laundering and criminal activities. The Act also provides for the establishment of a Criminal Assets Recovery Account (CARA).⁸ To ensure the implementation of the POCA, the National Prosecuting Authority established the AFU in 1999. The mandate of the Unit is to expunge undue profits obtained from criminal activities by utilising both conviction and non-conviction-based confiscation and forfeiture proceedings.⁹ The POCA also provides for the confiscation of the proceeds of crime in the hands of third parties, which is determined on a balance of probabilities that the property in question is connected to, or derived from, unlawful activity. Proceeds of an offence may be subject to pre-trial seizure.¹⁰

The monies and property that are confiscated following a court order, are deposited into the CARA which then funds projects (e.g. R150 million allocated to establish the Anti-Corruption Task Team; R20 million allocated towards funding civil society organisations rendering assistance to victims of crime) or directly compensates victims of economic crime. The distribution of monies and assets in the CARA are made by Cabinet, following recommendations of the Criminal Assets Recovery Committee and in line with the disbursement model as governed by the Grant Management Policy. However, allocations are not done annually, and funds are only distributed when made available.¹¹

South Africa is regarded as both a source and a destination country of proceeds of grand corruption. Some of the proceeds have been invested in residential properties in plush suburbs in Johannesburg and Cape Town, for example, by serving government ministers from the Democratic

Republic of Congo, and former and current military officials from Angola.¹² The country cooperates with other states and the ICCMA governs the provision of mutual legal assistance from South Africa, including confiscation and transfer of the proceeds of crime. South Africa provides assistance to requesting states when a formal letter of request has been issued. It is a requirement to apply for the letter of request as part of an asset forfeiture application, which would then be issued by the court. Only upon the court granting such an application, is the letter of request sent to the Director-General for sending on to the requested state.¹³

By way of example, South Africa played a role in assisting the Nigerian government in its asset recovery efforts against a former state governor (Mr. Diepreye Alamiyeseigha) by instituting non-conviction-based confiscation proceedings. The AFU confiscated the governor's luxury penthouse in Cape Town and sold the property in January 2007, with the proceeds of the sale being returned to the Nigerian government.¹⁴

According to the Department of Justice and Constitutional Development's 2019/2020 Annual Report, over the past few years, the AFU has obtained freezing orders to the value of R1.6 billion (approximately USD 112.5 million) relating to corruption where the amount involved is more than R5 million (approximately USD 351,500). From this amount, R190 million (approximately USD 13,4 million) was eventually recovered under the terms of the POCA.¹⁵ This is the lowest amount recovered within the last five years, resulting from AFU's involvement in time-intensive complex and high-value cases.

Three measures have contributed to the success of the AFU.

- Firstly, the Unit has sought to strengthen its cooperation with its law enforcement partners.
- Secondly, limited resources have been focused on high value and complex cases that have a greater impact, and
- Thirdly, the AFU has made use of Chapter 6 of the POCA, which provides for forfeiture independently of the criminal process.¹⁶

In practice, the AFU frequently confiscates the proceeds of crime and either returns the ill-gotten gains back to the victims or forfeits such proceeds to the state.¹⁷

CHALLENGES ASSOCIATED WITH ASSET RECOVERY

Despite these successes, the slow disposal rate of cases is believed to lead to high management costs for recovered assets, potentially resulting in a loss of value. For example, some of the confiscated properties include houses and businesses (e.g., hotels) which may have high operating costs and may be difficult to maintain after they have been seized. Other property management challenges relate to costs incurred through the appointment of curators to look after the frozen properties. Furthermore, asset recovery processes require adequate technical expertise, but a lack of forensic skills and knowledge is identified as one of the key barriers facing asset recovery agencies in South Africa. This insufficient levels of skill contributes to unsuccessful confiscation proceedings, resulting in costs to the country.¹⁸ In addition, shortage of staff was identified as the number one factor undermining the effectiveness of the NPA, followed by inadequate budgets and poor collaboration.¹⁹

Political interference, and poor coordination

and collaboration in the South African criminal justice system over the last few years have not only hindered the effectiveness of anti-corruption agencies, but these factors are also understood to have weakened and undermined institutions tasked with upholding the rule of law. Senior officials in the criminal justice system have been implicated in the State Capture Commission of Inquiry, bringing about a loss of trust in the system as a whole.²⁰ Even though the AFU is a critical component of South Africa's anti-corruption and asset recovery framework, the performance of the Unit has come under scrutiny, leading to the NPA's plans to amend the POCA in order to boost asset recovery and strengthen the activities of the AFU.²¹

The ACTT has also been scrutinised by the Directorate of Priority Crime Investigation (DPCI) and SIU for being ineffective in investigating and prosecuting serious cases of corruption.²² A key issue confronting the ACTT, as highlighted in South Africa's National Anti-Corruption Strategy (2020-2030), is that it has been effected by elements of state capture. In 2014, despite the limited resources of already constrained agencies, the Task Team's scope was broadened to focus on strategic and preventative activities, shifting from the core law-enforcement mandate.²³ The success of the ACTT relies on the collaborative efforts of its members, but a coordination framework is yet to be established, particularly in light of the need for it to strengthen investigations, prosecutions and asset recovery mechanisms in prioritised cases. An update to the Standing Committee on Public Accounts (SCOPA) by the ACTT in November 2020 revealed that since the Task Team's inception in 2010, there had been two cases of asset forfeiture totalling USD 575,898, which were forwarded to the CARA.²⁴

BIGGEST CORRUPTION CASES AND ASSET RECOVERY PROGRESS

GUPTAS AND STATE CAPTURE

The biggest and the most recent series of corruption cases in South Africa relate to observations made by the former Public Protector, Thuli Madonsela, into allegations of state capture. The State of Capture Commission is investigating allegations that former President Zuma allowed members of the Gupta family to have a direct influence in shaping the policies of the South African government highlights concerns relating to possible abuse of office, conflict of interest and ethical breaches by the President and his son, certain Members of Parliament, senior government officials, executive staff members of SOEs, and the Gupta family.²⁵

On 4 June 2021, local media reported that the Investigating Directorate, which is mandated to specifically focus on state-capture related corruption, had seized assets worth more than USD 38 million from the Gupta family and their business associates. The seized assets include luxury properties in several upmarket areas. The Gupta family fled from South Africa to Dubai and India in 2018, consequently leading to the Investigating Directorate issuing a warrant for their arrest through Interpol.²⁶ Both the United States of America (USA) and the United Kingdom (UK) have issued sanctions against the three Gupta brothers and their business associate Iqbal Sharma; essentially banning them from travelling to either country and conducting business within these territories. The sanctions further ensure that no financial institutions making transactions in US dollars can have dealings with the sanctioned people and that funds that had been allegedly laundered out of South Africa to these countries are frozen.²⁷

The application of the non-conviction-based asset forfeiture element of the POCA has enabled the National Prosecution Authority to initiate asset forfeiture proceedings against the Gupta family and their business associates. The value of the assets in South Africa is estimated at R520 million (approximately USD 38 million) and some of these include:²⁸

- Mr. Iqbal Sharma and his wife's Sandton house worth USD 836,084 and moveable property worth USD 34,836 (including artefacts imported from India) and an apartment worth USD 90,575 in Sandton, Johannesburg
- A house worth USD 1,463,148 million in the suburb of Constantia in Cape Town and another house worth USD 836,084 in Saxonworld, Johannesburg
- Islandsite Investments One Hundred and Eighty, an asset-rich company of the Guptas

According to the POCA, the Guptas and their business associates would forfeit the assets to the state should they be found guilty. In the Estina dairy farm scandal – one alleged corruption scheme linked to also to a network of Gupta associates, in which contracts were given to suspicious companies and are suspected of never reaching the intended beneficiaries – the government has already granted an order to freeze the assets of several suspected individuals.²⁹

Although the South African government has successfully confiscated assets believed to be linked to proceeds of crime within the country, questions have been raised on why similar efforts have not been carried out to recover assets and money that were allegedly laundered out of South Africa by

the Guptas and their associates to other countries.³⁰ South Africa and the United Arab Emirates (UAE) recently finalised an extradition and mutual legal assistance treaty that officially came into effect in July 2021. A portion of the funds misappropriated by the Guptas is said to have ended up in the UAE, where several of their companies are incorporated.³¹

FRAUD AND MISAPPROPRIATION OF FUNDS IN THE PRIVATE SECTOR: J ARTHUR BROWN AND FIDENTIA SCANDAL

The Panama Papers revealed that Fidentia, a South African company involved in swindling savings and investment funds reported to be worth over USD 69,673,738 from 47,000 widows and orphans of mineworkers, had paid a Panama-based law firm USD 59,000 in 2005 and 2006 to create two sets of offshore companies. When the scandal erupted in 2007, the company's broker, Graham Maddock flew to the USA, where he was later arrested and deported to South Africa.³² The mastermind behind the scandal, Mr. J Arthur Brown, is currently serving 15 years in prison for fraud, while the company was placed under curatorship and its assets auctioned in an attempt to recover some of the money. However, only USD 25,643,964 was recovered with many beneficiaries not receiving their expected pay-outs.³³

RONALD AND DARREN BOBROFF

South African authorities recently collaborated successfully with Israeli law enforcement to recover assets due to another case of private sector corruption. Ronald and Darren Bobroff had been said to enter into multiple agreements with their clients, which were used by the attorneys to commit fraud, theft and tax evasion. Transactions conducted on the Bobroffs bank accounts in Israel raised suspicions of money laundering and therefore the Israeli authorities froze the money and reached out for assistance to the Department of Justice in South Africa. Following an

investigation, the prosecuting authorities in South Africa claimed that the money in these accounts represent the proceeds of unlawful activities in South Africa, in particular theft, fraud, money laundering and transgressions of South African tax laws. Here, the investigations conducted by the National Director of Public Prosecutions (NDPP) found that the money was the proceeds of unlawful activities, which was stolen from their clients and laundered into Israel. Most of the assets found in Israel where therefore forfeited to the State.³⁴

REGIONAL AND INTERNATIONAL INSTITUTIONAL ENGAGEMENT

South Africa is a member of the Asset Recovery Inter-Agency Network for Southern Africa (ARINSA), the East and Southern African Anti-Money Laundering Group (ESAAMLG), and the Financial Action Task Force (FATF). The country is also an observer of the Camden Asset Recovery Interagency Network (CARIN). As a member of the ESSAMLG and FATF, South Africa is required to comply with a set of international standards on combating money laundering and the financing of terrorism and proliferation. The 2018 Mutual Evaluations Post-Evaluation Progress Report of South Africa, indicated that the country was generally compliant with the FATF Recommendations, but minor deficiencies in seven of the recommendations required attention. In response, South African authorities stated that they are in the process of widening the scope of financial institutions in order to address the deficiencies.³⁵

South Africa also sits on the G20 Anti-Corruption Working Group (ACWG) by virtue of its status as a G20 country. The Group was established in 2010 and its thematic focus areas include issues related to private sector integrity and transparency, bribery, international cooperation, asset recovery, beneficial ownership transparency, vulnerable sectors and capacity building. Speaking at the first ever G20 Anti-Corruption Ministerial meeting in 2020, the South African Minister of Public Service and Administration expressed concerns about the lack of coordination and collaboration between G20 member states. He noted that: "It is sad that on all international platforms we recommit to co-operating with each other, yet on the ground, there is little progress in this regard. We urge fellow G20 countries to lead by example in

affording one another wider measures of co-operation in the recovery of assets and law enforcement."³⁶

The South African government endorsed the Open Government Partnership (OGP) Declaration of Principles in September 2011, thereby committing itself to work with civil society towards enhancing transparency, public participation, accountability, and the fight against corruption in both public and private spheres.

CIVIL SOCIETY ENGAGEMENT IN ASSET RECOVERY

Civil society in South Africa is generally very vibrant and active on a host of issues and, in its efforts to curb state capture, it also advocates for further investigations into corruption cases and for the recovery of stolen public funds. While only a few organisations have been active in the area of asset recovery, interviews with CSO representatives indicate that the activities in this area, including regarding the tracing of stolen assets and asset recovery advocacy, are increasing.

OPERATIONAL FRAMEWORKS FOR CIVIL SOCIETY

Civil society in South Africa is very active and is able to operate freely. CSOs often give recommendations, conduct policy and advocacy and work with the government on setting up new legislation. While people are not restricted in their rights to organise themselves in varied interest groups, they sometimes face pressure from elites, harassment or assault, and as a result CIVICUS Monitor labels South Africa's civic space as narrowed.³⁷

The National Anti-Corruption Strategy (NACS) (2020-2030), which was developed by the government in collaboration with civil society and other partners, establishes the country's strategic anti-corruption framework and provides one of the strategic thrusts for the involvement of civil society in fighting corruption. One of the Strategy's objectives is to ensure citizen participation and mobilisation in the fight against corruption. This will be achieved when there is increased public trust, more participation and discourse by an active citizenry that is empowered through prevention, advisory and awareness campaigns on anti-corruption and governance matters.³⁸

The NACS Implementation Framework tasks the National Anti-Corruption Forum (NACF), established in 2001 through a coalition formed by the government, business and civil society sectors, to share information and best practice on anti-corruption work, and to advise government on national policy initiatives in implementing anti-corruption strategies. However, the cooperation of government and civil society in this forum has stalled. The NACS notes that: "Although the NACF was initially a very positive development in the anti-corruption landscape, it has not been very active since the fourth National Anti-Corruption Summit in 2011."³⁹ The lack of cooperation channels in support of South Africa's anti-corruption strategy has been also emphasised by a number of CSOs.⁴⁰

EXPERT ANALYSIS, ADVOCACY AND CAMPAIGNING

Civil society in South Africa plays an active and crucial role in monitoring that the activities of the private and public sphere are not being carried out for a private gain at the expense of the citizens. Civil society often harnesses public pressure to hold the powerful to the account via demonstrations, campaigns, advocacy and also litigation. Civil society organisations have taken legal action in several instances against private companies and politicians, including former president Zuma, who is implicated in corrupt and shady deals over the past decade. They also oversee corruption cases from their exposure until the final resolution, from the investigation to the prosecution process, and exercise pressure to hold public officials to account throughout.⁴¹

The recovery of assets stolen due to corruption has become one of the recommendations of the Civil Society

Working Group on State Capture, a coalition of more than 20 CSOs established in 2018. The coalition has been actively engaged in making joint submissions to the Judicial Commission of Inquiry into Allegations of State Capture (Zondo Commission) in order to assist the Commission in its fact-finding mission and to ensure accountability for economic crimes committed by both members of the political elite and private businesses linked to state capture.

The CSOs involved put forward a number of recommendations to address the past as well prevent the future capture of state-owned entities and public asset theft. Among others, they called for the state to act on its obligation to recover stolen money and encourage civil proceedings to facilitate this recovery. Moreover, they recommended that those convicted of receiving bribes must return it with full interest. Lastly, they recommended that the Commission must insist on the creation of a public fund that can be used to cover costs of the legal pursuit of funds siphoned off as a result of state capture.⁴²

While only a few organisations have been engaged in the area of asset recovery until recently, interviews with CSO representatives indicate that activities in this area, including regarding the tracing of stolen assets and asset recovery advocacy, are increasing.

INVESTIGATIVE JOURNALISM

Press freedom in South Africa is guaranteed directly in its constitution. Despite the wealth of independent and investigative journalists present, their work is often met with a strong discontent from some political leaders. Journalists still occasionally face harassment and are subject to personal and physical attacks for their work. The Covid-19 pandemic has further exacerbated the tension between authorities and journalists, leading to attacks during their attempt to cover lockdown-related stories.⁴³

One of the most important moments for investigative journalists in South Africa was the exposure of the role of the Gupta family in collaboration with the former president Zuma, in the systemic state capture under the influence of their extended network. The investigation known as the "Gupta Leaks" series is said to have constituted a critical turning point in the fight against cronyism in South Africa and led to the former president Zuma stepping down. Furthermore, it strongly contributed to the establishment of the Zondo commission of inquiry into state capture.⁴⁴

The Gupta Leaks highlighted the key role of investigative journalists and anonymous whistle-blowers, who made the email communication between the Gupta brothers and the former president Zuma public. Their analysis revealed the exact workings of the network behind many allegedly corrupt deals in South Africa, pointing to clear culprits, who were until then operating with impunity and unidentified. Besides exposing the faces of corruption in South Africa via dozens of stories, the media sector in the country also emerged energised and in a more positive light.⁴⁵

Alongside investigative media, several NGOs also conduct investigations and have teams of staff focusing on tracing stolen money and alerting local authorities to their findings.

CONCLUSION AND RECOMMENDATIONS

South Africa does not lack the legislative, policy and institutional armour required to address the corruption challenges the country faces. Rather, **it is a question of whether or not the country is using its anti-corruption tools sufficiently.**

While the country has made progress in establishing a comprehensive anti-corruption framework, challenges in the criminal justice field remain. Political interference, and poor coordination and collaboration between anti-corruption agencies has not only tarnished levels of public trust in these institutions but has also affected their performance in effectively combating corruption. If some of these challenges are not addressed, there is a real risk of the country continuing to be used as a conduit for illicit financial flows, money laundering and other forms of corruption.

All stakeholders involved should take action in order to fulfil the full potential of the National Anti-Corruption Strategy and fight illicit financial flows via more effective asset recovery proceedings. Based on the findings of our desk-based research and interviews with CSO representatives conducted by CiFAR, this research offers several **policy recommendations** where further efforts of government and civil society should be concentrated:

- Increase **transparency in government procurement processes** through the upcoming Public Procurement Bill, which should unify the fragmented legislation governing public procurement and establish effective mechanisms of public oversight.
- Establish a **strong beneficial ownership regulatory framework**, including a registry of beneficial

owners of legal entities, in line with South Africa's international commitments. This should improve access to beneficial ownership information by competent authorities, and as much as possible by the civil society too.

- Dedicated anti-corruption agencies, such as SIU and AFU, should continue in their efforts to **strengthen resourcing, coordination, and transnational cooperation** and work with the civil society throughout the asset recovery process, including in the investigation, and re-use of assets.
- Improve the **slow disposal rate of cases**, which currently leads to high management costs of recovered assets.

Civil society in South Africa has played and continues to play an important role in the implementation of the country's anti-corruption strategy. The following recommendations are proposed to **strengthen the role of civil society** in asset recovery and the fight against illicit financial flows:

- Raise **awareness about asset recovery**: Non-state actors have an important role to play in sensitising the general public on issues related to illicit financial flows, money laundering and asset recovery. All citizens may not be aware of the political and economic implications of forms of grand corruption, but the continuous loss of large sums of money out of the country will have a long term negative impact on the levels of the country's development. Thus, these actors could leverage on the country's robust anti-corruption framework to raise

levels of awareness on asset recovery and the importance of fighting corruption in general.

- Conduct **research on asset recovery**: A number of civil society organisations are involved in various dimensions of anti-corruption work. A core component of this work is to educate, train and conduct research on issues of corruption and anti-corruption. Evidenced-based research is particularly important in contributing to and informing policy dialogue and any planned or ongoing reforms in the area of asset recovery. Concise research on the country's asset recovery programme could thus be a vital step in raising awareness on asset recovery and also in identifying bottlenecks in the current framework.
- Undertake **capacity building on asset recovery**: Non-state actors should be adequately trained to understand the technical complexities related to illicit financial flows, money laundering and asset recovery. Increased training and knowledge about asset recovery in South Africa, as well as successful practices elsewhere, would enhance civil society's ability to monitor and advise government and other relevant oversight bodies on existing gaps in South Africa's asset recovery response mechanisms.
- Join forces to **advocate for the recovery of stolen assets collectively**: CSOs' response to allegations of COVID-19-related corruption in South Africa demonstrated how influential these organisations are, especially when joining forces. Therefore, CSOs should use this experience to influence policy reform and continue to contribute meaningfully to the country's anti-corruption response. The use of different media platforms (e.g. national and community radio,

press releases, etc.) by CSOs have proven to be helpful in raising awareness on COVID-19 related corruption and in demanding greater oversight around the use of funds intended to fight the COVID-19 pandemic. Similar efforts can be replicated in advocating for the need to recover all assets (particularly those that have been transferred out of the country) that are linked to major corruption cases.

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