Independent Reporting Mechanism

Action Plan Review:
South Africa 2024–2026

Open
Government
Partnership

Independent
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Section I: Overview

South Africa's fifth action plan takes a citizen-centric approach to government data transparency. The two commitments seek to expand open budget data and establish a framework for open data principals at the national and municipal levels. The action plan was developed collaboratively between government and civil society, with an aim to revive the OGP process in South Africa.

South Africa's fifth OGP action plan is a step towards revitalizing South Africa's OGP process after missing the submission deadlines in 2022 and 2023.[1] In accordance with OGP rules, implementation for this action plan will run from June 2024 to June 2026. While modest in length, the plan shows greater ambition and clarity than the previous one.

Commitment 1 has modest potential to expand public fiscal data. It prioritizes publishing financial data for autonomous or semi-autonomous public entities (Schedule 3A and 3C) and municipalities. Expanding information on the Vulekamali and GoMuni portals aligns with the National Treasury's efforts to boost open budgeting and increase its online presence.[2]

Commitment 2 is spearheaded by the Council for Scientific and Industrial Research Centre for the 4th Industrial Revolution (CSIR 4IR), a new participant in the OGP process. It builds towards a citizen-oriented open-data framework that would ensure all three levels of government publish quality data that is understandable to citizens. Commitment 2 supports South Africa's recent National Policy on Data Cloud[3] by creating a standardized open data framework.

> ## AT A GLANCE
>
> **Participating since** 2011
> **Number of commitments:** 2
>
> **Overview of commitments:**
> Commitments with an open government lens: 2 (100%)
> Commitments with substantial potential for results: 1 (50%)
> Promising commitments: 2
>
> **Policy areas:**
> Carried over from previous action plans:
> - Fiscal transparency
> - Open data
>
> **Compliance with OGP minimum requirements for co-creation:** No

The action plan aims to support implementation of South Africa's African Union African Peer Review Mechanism (APRM) National Plan of Action. In the next action plan, South Africa's OGP Steering Committee can consider priority APRM reforms around which civil society and government reformers form a coalition to collaboratively advance. As of January 2025, the government, law clinics, and partners were developing a commitment to submit to the Open Gov Challenge on access to justice.[4]

The action plan resulted from collaboration between the government and non-governmental actors.[5] Persistent lobbying from CSOs motivated the government to commit to the current action plan. Seasoned civil society members also onboarded new government participants, such as CSIR. Moreover, South Africa started the process of transforming the Interim Steering Committee into a formalized multistakeholder forum (MSF). The government and civil society organizations

(CSOs) co-created the draft Terms of Reference.[6] Civil society acknowledged the government's enthusiasm towards revamping the forum.[7]

The IRM recommends that reformers use this action plan cycle to continue strengthening South Africa's OGP process. The MSF can meet regularly and maintain ongoing communication to support implementation progress and establish ways of working among members. The MSF can communicate progress on both commitments to help demonstrate the value of undertaking reforms through the OGP platform. These steps can build towards expanding participants and reforms in future action plans.

South Africa has made progress towards meeting the minimum requirements under the OGP Participation and Co-Creation Standards. The Department of Public Service and Administration (DPSA) has worked towards formalizing the OGP Steering Committee and increasing the functionality of the OGP website. South Africa fell short as they did not publish a roadmap with information on how to engage at least two weeks before the start of co-creation. DPSA did publish a roadmap, around halfway through the co-creation period when the action plan was drafted. DPSA also did not conduct public outreach on OGP and opportunities to participate.[8] As a result, civil society had limited awareness that the OGP process was being revitalized, which reduced participants and possible reform areas. The OGP Steering Committee is recommended to ensure sufficient prior notice and public outreach before co-creation of the next action plan to allow broader engagement.

Additionally, inconsistent availability of government websites may present a challenge to implementation. Websites key to commitments in this action plan—such as GoMuni and Vulekamali—were not always functional during review. Consistent availability of these portals will be essential for the commitments to achieve their transparency aims. Reformers can consider opportunities for civil society to help address online information gaps when government websites are not functional.

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[1] "South Africa – Procedural Review Resolution by C&S Subcommittee (May 2024)," Open Government Partnership, 21 May 2024, https://www.opengovpartnership.org/documents/south-africa-procedural-review-resolution-by-cs-subcommittee-may-2024.

[2] Prudence Cele (National Treasury), interview by IRM researcher, 4 October 2024.

[3] "National Policy on Data and Cloud," Department of Communications and Digital Technologies, June 2024, https://www.gov.za/sites/default/files/gcis_document/202406/50741gen2533.pdf.

[4] Department of Public Service and Administration, pre-publication comment provided to the IRM, January 2025; "Open Gov Challenge," Open Government Partnership, accessed January 2025, https://www.opengovpartnership.org/the-open-gov-challenge.

[5] Patrick Sokhela (Point of Contact, Department of Public Service and Administration), interview by IRM researcher, 13 September 2024.

[6] "Terms Of Reference for the OGP South Africa Multistakeholder Forum (MSF)," Department of Public Service and Administration, accessed 20 October 2024, https://www.dpsa.gov.za/ogp/documents/2nd/4. Proposal on_the formalisation of the OGP South Africa MSF (002) (1).pdf.

[7] Zuki Kota (Member, OGP Steering Committee; Member, South Africa Interim Steering Committee; Program Head, Public Service Accountability Monitor), correspondence with IRM researcher, 7 November 2024.

[8] "National Roadmap Towards the Development of the South African National Action Plan," Department of Public Service and Administration, https://www.dpsa.gov.za/ogp/documents/Annexe C_Roadmap towards the_finalisation of the RSA OGP NAP 31 December 2023.pdf.

Section II: Promising Commitments

The following review looks at the two commitments that the IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

Table 1. Promising commitments

Promising Commitments
Commitment 1 Transformative fiscal transparency aims to expand fiscal data and information available on the Vulekamali and Municipal Money portals.
Commitment 2 Open Data Transparency promises to develop a framework for citizen-centric open data across municipalities and at the national level.

Commitment 1: Transformative Fiscal Transparency
National Treasury

For a complete description, see Commitment 1 in South Africa 2024–2026 Action Plan.

Context and objectives
Commitment 1 continues public sector fiscal transparency reforms introduced in previous action plans. Improving fiscal transparency is a priority area for OGP[1] and the African Union's African Peer Review Mechanism (APRM).[2] Proposed by the government during co-creation, this commitment was approved by the Interim Steering Committee.[3]

Under previous action plans, the National Treasury created and maintained the Vulekamali[4] and Municipal Money[5] portals alongside civil society. This commitment promises to add financial data for autonomous or semi-autonomous public entities (Schedules 3A and 3C) to the Vulekamali portal.[6] It also proposes to disclose municipal financial data on the GoMuni portal.[7] Implementers will continue to update the Vulekamali portal as required under the Public Financial Management Act and the GoMuni portal beyond the implementation period.[8] This commitment is expected to directly strengthen government transparency and indirectly support informed civic participation and public accountability.

Potential for results: Modest
Commitment 1 has modest potential to continue South Africa's fiscal transparency reforms at the national and municipal levels. It aims to expand available data and promote open and accessible access to government financial information. Implementers seek to shift practices towards simplifying technical jargon and making information accessible to non-experts.[9] The commitment states these activities aim to contribute to South Africa's fight against corruption. Implementers added that this reform also seeks to increase citizens' budget literacy.[10] Increased availability of public financial information is an incremental step towards these broader objectives. A civil society partner noted that this commitment currently misses an opportunity to introduce innovative reforms.[11] South Africa ranks well above the global average for budget transparency, scoring 83 out of 100 points in the 2023 Open Budget Index (OBI). During implementation, reformers have the opportunity to raise the commitment's level of ambition by also strengthening

channels for public participation. South Africa scored 35 out of 100 points for public participation and 76 out of 100 for budget oversight in the 2023 OBI.[12]

Milestone 1 seeks to add expenditure and revenue data for Schedules 3A and 3C entities on the Vulekamali portal.[13] These are autonomous or semi-autonomous public entities with the mandate to fulfil a specific economic or social responsibility of the government. They are funded through government and public money, either through transfers from the Revenue Fund or statutory money.[14] In 2024, the institutions were allocated 14% of the national budget.[15] This data was previously available to the National Treasury and the respective public organizations but was not uploaded to publicly accessible portals.[16] As of October 2024, the National Treasury was seeking to stabilize the Vulekamali portal to ensure it was consistently operational and reliable. The Vulekamali team had created the functionality to display data for Schedules 3A and 3C entities, which was ready to be tested once the portal was stabilized. They had also created a video to explain these entities to the public.[17]

Milestone 2 foresees publishing municipal financial data through the GoMuni portal,[18] a Local Government Reporting System where all municipalities report their live data monthly.[19] Reports submitted to this portal by municipalities are simplified and used as data sources for the Municipal Money portal. Implementers noted that accessing comprehensive data on all municipalities was difficult before the portals were introduced.[20] The process of compiling financial data from 257 municipalities was time consuming, slow, and likely expensive for researchers, CSOs and the public.

In October 2024, the Local Government Database Management team had begun to implement Milestone 2[21] as the municipal fiscal data to be captured in the portal was already available. Municipalities submit monthly, quarterly, and annual reports to the National Treasury under the Municipal Finance Management Act.[22] Milestone 2 also promises to publish and share annual municipal expenditure reports. This demonstrates national and local government openness to CSO audits, as they pledge to publish and share yearly financial data with CSOs. To ensure these portals reach a wider audience, the lead agency is engaging on Facebook[23] and X[24] as well as offline outreach programs. They noted they have been showcasing the portals at public conferences and exhibitions since December 2023.[25]

National Treasury representatives expressed their hope that these efforts will support more informed public engagement in budget processes. Budget literacy remains a constraint in transforming South Africa's fiscal policy.[26] In most municipalities, citizens were unable to distinguish priority demands in budget meetings because of insufficient knowledge.[27] The GoMuni portal provides tailored options for experts and the public. For instance, the GoDatabase interface is designed for users with professional expertise while the GoPublic interface, which includes the Municipal Money portal, provides information accessible to the average person. Implementers noted that high school and university students use the GoMuni and municipal money portals as educational materials.[28] To ensure this commitment supports budget literacy aims, the National Treasury could conduct outreach to facilitate public, civil society, and student use of newly available data. This outreach could be tied to opportunities to participate in budget process, to ensure transparency efforts translate to informed participation.

Open financial data is essential for CSOs tracking public sector spending, performance, corruption, and service delivery. Several CSOs rely on this data to monitor, audit, and insert checks and balances on public officials.[29] Financial data from GoMuni, Municipal Money, Vulekamali, and annual reports could help CSOs advocate for policies that reflect citizens' priority needs and raise concerns over anomalies. However, this commitment currently does not include

activities to strengthen channels for public participation and accountability in budget processes. Previously, the National Treasury piloted pre-budget participation mechanisms in partnership with organizations such as the Imali Yethu Coalition for Open Budget, the Global Initiative on Financial Transparency (GIFT), and the International Budget Partnership (IBP).[30] Expanding and strengthening such processes is an opportunity to raise this commitment's level of ambition in line with the National Treasury's capabilities.

Opportunities, challenges, and recommendations during implementation
South Africa has a track record for innovative fiscal transparency reforms.[31] In comparison, this commitment currently includes modest activities. The commitment has a secondary aim to be a step towards revitalizing South Africa's OGP process. The OGP Point of Contact hopes that progress under this commitment can help to reinforce confidence and therefore willingness among government actors to engage in OGP in South Africa.[32] To support this aim, **the IRM recommends that implementation of this commitment be undertaken in collaboration with civil society and to take opportunities to raise the commitment's ambition**.

A representative from Public Service Accountability Monitor, a civil society member of the Interim Steering Committee, flagged strengthening channels for civic participation in budget processes as an opportunity for the National Treasury to increase the reform's ambition.[33] For instance, the **National Treasury could engage local civil society in several target municipalities or metropolitan areas to use budget information to inform their participation in budget processes**. In addition, the Open Budget Index 2023 survey recommends:[34]

- The National Treasury **expands opportunities for civil society** to participate during budget implementation and actively engage vulnerable and underrepresented communities.
- The parliament **enables the public and CSOs to testify** in budget proposal hearings before its approval and in hearings on the audit report.

In the short term, the National Treasury and implementing partners are encouraged to **continue making financial information accessible**. This can include conducting outreach, working with municipalities, providing information in local languages, and sharing key information offline for those without the internet. Data on user traffic on these portals can be used to track data use and inform outreach. In the longer term, the Programme Head for the Public Service Accountability Monitor underscored that **linking government budget, performance, and procurement data is key to tracking government spending** and possible misuse. She noted that the **passage of a robust public procurement bill** could enshrine vital transparency and public accountability.[35]

Commitment 2: Open Data Transparency
Council for Scientific and Industrial Research Centre for the 4th Industrial Revolution (CSIR 4IR), Department of Public Service and Administration (DPSA), National Treasury

For a complete description, see Commitment 2 in South Africa 2024–2026 Action Plan.

Context and objectives
Commitment 2 initiates steps to improve the quality and quantity of open data published at the national, provincial, and municipal levels of government. The commitment pilots an open data framework in 6 metropolitan municipalities with the intention to develop a policy that scales across municipalities and the national level in the longer term. Under previous action plans, South Africa piloted an Open Data Portal, created an Open Data Steering Committee, and increased open data usage.[36] However, there is currently no national open data portal while access to government data at the national, provincial, and municipal levels is limited to financial data.

The Council for Scientific and Industrial Research (CSIR) proposed this commitment and consulted with non-government stakeholders before it's adoption.[37] CSIR created a multistakeholder forum comprising government and non-governmental members to implement the commitment.[38] This reform has support from CSOs such as Kagiso Trust and Open Cities Lab.

Potential for results: Substantial
This commitment aims to develop an Open Data Sharing Framework to improve the quality and consistency of open data across levels of government. The first phase of this reform is already underway. Phase one involved the co-creation and piloting of the framework in metropolitan municipalities. At the time of writing, further municipalities had been invited to co-create and adopt the framework. The second phase aims to develop a national Open Data Sharing Framework.[39] Implementers started with municipalities as municipal data relates to day-to-day services of interest to citizens like water, local health clinics, and electricity.[40]

During the implementation period, metropolitan and district municipalities are invited to voluntarily participate in the framework. However, the framework would become binding when municipalities adopt and incorporate it into their open data policies.[41] The reform's ultimate goal is to make the Open Data Sharing Framework binding for local, provincial, and national governments. At the time of review, the OGP Point of Contact (POC) was preparing to present the reform to the cabinet[42] to rally support and approval of a national Open Data Sharing Framework from the highest government authorities. The South African Local Government Association (SALGA), South African City Network (SACN), Kagiso Trust, and Open Cities Lab also had ongoing dialogue on a national framework. The POC anticipates that there will be a framework to inform national government departments' online data publication by fall 2025.[43]

The commitment pilots a citizen-oriented data approach that includes citizens in the government's digital transformation agenda.[44] It positions citizens as key stakeholders in open data transparency, pushing government departments to prioritize users when sharing data in public portals. The Open Data Sharing Framework requires data to (a) be open by default, (b) be timely and comprehensive, (c) be accessible and usable, (d) be comparable and interoperable, (e) improve government and citizen engagement, and (f) be inclusive and innovative.[45] This is intended to complement existing policies, such as the National Policy on Data and Cloud.[46] Prior to this reform, municipal, provincial and national government had open data policies and were obliged to publish their financial and performance data in open portals. However, South Africa does not have a national open data portal outside of existing budget portals.[47] Therefore, data on

government services is not evenly and consistently accessible across government. In the longer term, this commitment aims to lay the foundation for an open data portal where citizens can access data on municipal government services.

Implementation was underway for all three milestones by the time of the writing in October 2024. CSIR had co-created a draft framework with several municipalities prior to this commitment.[48] As of 27 March 2024, the metropolitan cities Tshwane, Ekurhuleni, eThekwini, and Johannesburg adopted and incorporated the framework into their open data policies. Concurrently, government and civil society implementers had initiated dialogue with four municipalities in Cape Winelands District, Buffalo City Metro, Makhana Municipality, and Nelson Mandela Bay Metro.[49]

Implementers confirmed in interviews that they are undertaking activities beyond those listed in the action plan to advance the commitment's objective. This includes approaching municipalities beyond the metropolitan cities. CSIR is receiving requests to assist provincial, district and individual municipalities in the development of their respective open data policies in the Eastern Cape and KwaZulu-Natal.[50] They also noted that SALGA and SACN were working towards standardizing data governance and information sharing in the 257 municipalities.[51]

Endorsements from the three levels of government of the proposed six principles[52] of the Open Data Sharing Framework could bolster government transparency and strengthen citizens' digital rights. The first principle proposes that the government open data by default and provide understandable justification for sealed information. The pledge by public institutions to this principle would obligate them to publish data and grant access to government websites and portals. The principle would also require public institutions to guarantee data protection and privacy in public portals, thus protecting citizens from unauthorized harvesting of personal data.

This commitment's potential lies in its aim to institutionalize the publication of high-quality data across levels of government. Therefore, evidence of significant results would include the co-creation and adoption of data sharing frameworks at the national and municipal levels. To achieve notable results by the end of the implementation period, operationalization of the framework would be underway and expected to continue in an increasing number of metropolitan cities, municipalities, and national departments. This would be evidenced by government entities' increasing publication of comprehensive and user-friendly data.

Opportunities, challenges, and recommendations during implementation
This commitment benefits from existing momentum and a coalition of government and civil society reformers. If the reform progresses beyond the pilot stage and begins to institutionalize binding frameworks for open data across government, it may achieve significant results. As reformers look ahead, they can consider opportunities to ensure the framework translates into permanent changes to government data practices:

- **Design a strategy to measure compliance**: While integrating the Open Data Policy into each individual city's current data policies[53] is a measure of success, successful execution of the principles would be a key indicator for meaningful implementation.
- **Designing mechanisms to promote adoption**: Implementers can design strategies to encourage and assist government agencies to adopt and comply with the Open Data Sharing Framework.
- **Promote data use**: By making data easily accessible and informing key groups of how to access and use the data. Reformers can raise awareness among target groups such as the private sector, business communities, researchers, students, and citizens.

[1] "IRM Co-Creation Brief: South Africa 2022," Open Government Partnership, 10 October 2024, https://www.opengovpartnership.org/wp-content/uploads/2022/06/South-Africa_Co-Creation-Brief_2022.pdf.

[2] "The African Peer Review Mechanism," African Union, 10 October 2024, https://au.int/en/aprm.

[3] Patrick Sokhela (Point of Contact, Department of Public Service and Administration), interview by IRM researcher, 13 September 2024.

[4] "Vulekamali – Online Budget Data Portal," National Treasury, accessed 21 October 2024, https://vulekamali.gov.za/about.

[5] "Municipal Money Portal," National Treasury, accessed 21 October 2024, https://municipalmoney.gov.za.

[6] "Public Institutions Listed in PFMA Schedules 1, 2, 3A, 3B, 3C, and 3D as of 26 March 2024," National Treasury, 26 March 2024, https://www.treasury.gov.za/legislation/pfma/public%20entities/2024-03-26%20Public%20institutions%20Sch%201-3D.pdf.

[7] "GoMuni Portal," National Treasury, accessed 25 October 2024, https://lg.treasury.gov.za/ibi_apps/public.

[8] Sephiri Tlhomeli, Una Rautenbach, Kgothatso Matlala, Xolile Mduli, and Nomfeyeko Mayambela (Deputy Director, Local Government Database Management), interview by IRM researcher, 24 October 2024.

[9] Tlhomeli, interview.

[10] Rautenbach, interview.

[11] Zuki Kota (Member, OGP Steering Committee; Member, South Africa Interim Steering Committee; Program Head, Public Service Accountability Monitor), correspondence with IRM researcher, 7 November 2024.

[12] "Open Budget Index: South Africa 2023," International Budget Partnership, 2023, https://internationalbudget.org/open-budget-survey/country-results/2023/south-africa.

[13] Prudence Cele (National Treasury), interview by IRM researcher, 4 October 2024.

[14] "Annual Report Guide for Schedule 3A and 3C Public Entities," National Treasury, accessed 17 October 2024, https://d7.westerncape.gov.za/sites/www.westerncape.gov.za/files/public_entity_ar_guide.pdf.

[15] Patrick Sokhela, "Schedule 3A and 3C budget allocation," shared with IRM researcher, https://docs.google.com/spreadsheets/d/1Pr5Bp626qiP_Nre_tYrBJ0vC7xZ-vUka/edit?gid=818128562#gid=818128562.

[16] Cele, interview.

[17] Vulekamali Team (National Treasury), letter to the IRM via South Africa OGP Point of Contact, 10 October 2024.

[18] "GoMuni Portal," National Treasury.

[19] Patrick Sokhela (Point of Contact, Department of Public Service and Administration), correspondence with IRM researcher, 22 October 2024.

[20] Tlhomeli, Rautenbach, Matlala, Mduli, and Mayambela, interview.

[21] Tlhomeli, Rautenbach, Matlala, Mduli, and Mayambela, interview.

[22] Cele, interview; Sokhela, interview, 13 September; Tlhomeli, Rautenbach, Matlala, Mduli, and Mayambela, interview.

[23] National Treasury, "Municipal Money," Facebook, accessed 27 October 2024, https://www.facebook.com/MunicipalMoneySA?mibextid=ZbWKwL.

[24] National Treasury, "Municipal Money," Facebook.

[25] Tlhomeli, Rautenbach, Matlala, Mduli, and Mayambela, interview.

[26] Cele, interview.

[27] Tlhomeli, Rautenbach, Matlala, Mduli, and Mayambela, interview.

[28] Tlhomeli, Rautenbach, Matlala, Mduli, and Mayambela, interview.

[29] Kota, correspondence; Sokhela, interview, 13 September; Cele, interview.

[30] Kota, correspondence.

[31] "Lessons from Reformers: South Africa Empowers Citizens with Budget Data" Open Government Partnership, 17 November 2020, https://www.opengovpartnership.org/stories/lessons-from-reformers-south-africa-empowers-citizens-with-budget-data.

[32] "OGP 5th National Action Plan 2023–2026," Department of Public Service and Administration, 30 December 2023, https://www.opengovpartnership.org/documents/south-africa-action-plan-2024-2026-june; Kota, correspondence.

[33] Kota, correspondence.

[34] "South Africa Takes Second Place in the 2021 Open Budget Index Survey," National Treasury, 15 October 2024, https://www.treasury.gov.za/comm_media/press/2022/2022071501%20MEDIA%20STATEMENT%20-%20OPEN%20BUDGET%20INDEX%202022.pdf.

[35] Kota, correspondence.

[36] "South Africa's Third National Action Plan 2016–2018," Department of Public Service and Administration, 21 January 2016, https://www.opengovpartnership.org/documents/south-africas-third-national-action-plan-2016-2018; Tracy-Lynn Humby, "IRM End-of-Term Report: South Africa 2016–2018," Open Government Partnership, 25 February 2019, https://www.opengovpartnership.org/documents/south-africa-end-of-term-report-2016-2018; "South Africa OGP 4th National Action Plan 2020–2022," Department of Public Service and Administration, 14 January 2021, https://www.opengovpartnership.org/documents/south-africa-action-plan-2020-2022.

[37] Patrick Sokhela, (Point of Contact, Department of Public Service and Administration), interview by IRM researcher, 11 October 2024.

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[38] Zaaid du Toit, (Council for Scientific and Industrial Research, Centre for the 4th Industrial Revolution), interview by IRM researcher, 11 October 2024.
[39] Du Toit, interview; Sokhela, interview, 11 October.
[40] Du Toit, interview; Sokhela, interview, 11 October.
[41] Du Toit, interview.
[42] Sokhela, interview, 11 October.
[43] Sokhela, interview, 11 October.
[44] "Communications," Government of South Africa, accessed 23 October 2020, https://www.gov.za/about-sa/communications-0.
[45] Zaaid du Toit, "Open Data Principles," Council for Scientific and Industrial Research Centre for the 4th Industrial Revolution, 25 October 2024. Document provided to the IRM.
[46] "National Policy on Data and Cloud," Department of Communications and Digital Technologies, June 2024, https://www.gov.za/sites/default/files/gcis_document/202406/50741gen2533.pdf.
[47] Du Toit, interview.
[48] Du Toit, interview.
[49] Zaaid du Toit, "Progress Report," Document provided to the IRM.
[50] "OGP South Africa Interim Steering Committee Meeting: Revival of the OGP in South Africa in Line with the APRM-OGP Complementarity," Department of Public Service and Administration, accessed 29 October 2024. ogp.gov.za
[51] "OGP South Africa Interim Steering Committee Meeting: Revival of the OGP in South Africa in Line with the APRM-OGP Complementarity," Department of Public Service and Administration.
[52] Du Toit, "Open Data Principles," Council for Scientific and Industrial Research Centre for the 4th Industrial Revolution.
[53] Du Toit, "Open Data Principles," Council for Scientific and Industrial Research Centre for the 4th Industrial Revolution.

Open Government Partnership

Independent Reporting

Section III: Methodology and IRM Indicators

This product is a concise, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, represent a high priority for country stakeholders, acknowledged as a priority in the national open government context, or a combination of these factors.

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM reviews commitments using three indicators:

1. Verifiability: The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:

- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

2. Open Government Lens: The IRM determines if the commitment relates to the open government values of transparency, civic participation, and/or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform, influence or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, marginalized or underrepresented groups?

  Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, et cetera)? Will the government improve legal, policy, institutional or practical conditions related to civic

space such as freedom of expression, association and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking or fostering an independent news media ecosystem)?

- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

3. Potential for Results: The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment's possibility to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area. The indicator is assessed as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review focuses its analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

This review was prepared by the IRM in collaboration with Blessmore Nhikiti as researcher and Andy McDevitt as external expert reviewer. During the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).[1] The IRM methodology, product quality, and review process are overseen by the IEP.[2]

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[1] "International Experts Panel," Open Government Partnership, accessed 15 July 2024, https://www.opengovpartnership.org/about/who-we-are/international-experts-panel.
[2] For more information, see: "Overview – Independent Reporting Mechanism," Open Government Partnership, accessed 15 July 2024, https://www.opengovpartnership.org/irm-guidance-overview.

Annex 1: Commitment Data

Commitment 1: Transformative Fiscal Transparency

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 2: Open Data Transparency

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial

Annex 2: Action Plan Co-Creation

The OGP Participation and Co-Creation Standards are guidelines to support OGP members in undertaking collaborative OGP processes.[1] The Standards include minimum requirements that set a baseline for participatory and transparent OGP processes. In the Action Plan Review, the IRM assesses compliance with the minimum requirements applicable during co-creation of the action plan.[2] Members that have not met all minimum requirements are considered acting contrary to OGP process.

South Africa is not acting according to OGP process, as they did not meet all the minimum requirements applicable during development of the action plan. The IRM will assess South Africa's compliance with OGP process again in two years. Members that are currently not acting according to OGP process can rectify their status by meeting the minimum requirements relevant at the next moment of assessment.[3]

Table 2. Compliance with minimum requirements during co-creation

Minimum requirement	Met?
1.1 Space for dialogue: South Africa has had an Interim Steering Committee since 2018, with 5 non-government and 3 government members. These members met at least once every six months and have committed to meeting at least four times annually. They steer co-creation and implementation of the action plan. At the time of review, South Africa was working towards formalizing the committee and the draft terms of reference.[4]	Yes
2.1 OGP website: South Africa's OGP website (ogp.gov.za) was inconsistently available due to web security challenges. In August 2024, information on OGP was moved to the Department of Public Service and Administration (DPSA) website (dpsa.gov.za) while the issue was resolved. It contains the current action plan and evidence of co-creation and implementation.[5]	Yes
2.2 Repository: South Africa's OGP website serves as their repository. It includes previous action plans, co-creation updates, minutes from multistakeholder forum (MSF) meetings, commitment development drafts, an OGP roadmap, and implementation updates.[6]	Yes
3.1 Advanced notice: DPSA published a roadmap on the co-creation process on 9 October 2023.[7] This was after the action plan was drafted but prior to a public comment period for the draft commitments. This minimum requirement was not met as the roadmap was not published at least two weeks before the start of co-creation. Therefore, individuals beyond the Interim Steering Committee did not have information on opportunities to engage in co-creation, beyond commenting on the draft action plan.	No
3.2 Outreach: DPSA convened meetings with state institutions and revived the OGP Interim Steering Committee in preparation for developing the action plan. However, neither DPSA nor the Interim Steering Committee conducted outreach to non-government actors to provide information on OGP and opportunities to get involved.[8]	No
3.3 Feedback mechanism: The action plan was drafted through Interim Steering Committee meetings and meetings with relevant state institutions.[9] The draft action plan was made available online for public comments available for 6 weeks, from 13 October to 27 November 2023.[10]	Yes
4.1 Reasoned response: Government and civil society discussed proposals and public comments on the draft action plan in Interim Steering Committee meetings.[11] In the future, the committee is encouraged to publish a response to public input provided during the comment period.	Yes

5.1 Open implementation: The IRM will assess whether meetings were held with civil society stakeholders to present implementation progress and enable civil society to provide comments at least twice a year.	Not applicable

1 "OGP Participation and Co-Creation Standards," Open Government Partnership, 24 November 2021, https://www.opengovpartnership.org/ogp-participation-co-creation-standards.

2 "IRM Guidelines for the Assessment of Minimum Requirements," Open Government Partnership, 31 May 2022, https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements.

3 Editorial note: For two-year action plans, the IRM will assess compliance with minimum requirements applicable to implementation in the Results Report. The IRM will provide a comprehensive analysis of participation and co-creation practices throughout the action plan cycle in the Results Report. See: "OGP National Handbook – Rules and Guidance for Participants (2024)," Open Government Partnership, 11 April 2024, https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2024.

4 "Draft Proposal on the Formalisation of the OGP South Africa Multi-Stakeholder Forum (MSF)," Department of Public Service and Administration, https://www.dpsa.gov.za/ogp/documents/2nd/4. Proposal on the formalisation of the OGP South Africa MSF (002) (1).pdf.

5 "OGP South Africa," Department of Public Service and Administration, accessed 4 December 2024, https://www.dpsa.gov.za/ogp.

6 "OGP South Africa," Department of Public Service and Administration.

7 "National Roadmap Towards the Development of the South African National Action Plan," Department of Public Service and Administration, https://www.dpsa.gov.za/ogp/documents/Annexe C_Roadmap towards the finalisation of the RSA OGP NAP 31 December 2023.pdf.

8 "National Roadmap Towards the Development of the South African National Action Plan," Department of Public Service and Administration.

9 "Discussion and Endorsement of Draft Detailed Commitments for the OGP Fifth (5th) National Action Plan," Department of Public Service and Administration,, https://drive.google.com/drive/folders/1F0JaqRsWq0kFq6OF_6MGjsVtAaAAPI40.

10 "National Roadmap Towards the Development of the South African National Action Plan," Department of Public Service and Administration.

11 "OGP South Africa," Department of Public Service and Administration.

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