



RESPONSIVE PLANNING AND RESPONSIBLE IMPLEMENTATION: IMPROVING GOOD LOCAL GOVERNANCE IN THE INTEGRATED DEVELOPMENT PLANNING PROCESS

Ronald Eglin and Nontando Ngamlana - Afesis-corplan

South Africa is a representative, constitutional democracy whose government is based on the will of the people. The Constitution (1996) calls for mechanisms that allow citizens to participate in decisions about their own development and in debates about the laws that must govern them.



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VOTING IS ONE of the mechanisms available to citizens to participate in decision-making in a democracy. In 2014, over half (53.77%) of South African eligible voters stood, often in long queues, to choose the people they felt were best placed to make decisions on their behalf (International IDEA nd). For some people, voting their favourite party into power is enough: government must just get on and do what it promised. For others, however, this is not enough. They want the opportunity to participate between elections and influence government decisions about matters that directly affect their lives and their communities, and to hold decision-makers accountable for implementing these crucial decisions.

Local government provides citizens with the best opportunity to engage with government between elections. This level of government deals with issues that most directly affect people. This paper focuses on one of the key mechanisms for citizen engagement – the Integrated Development Plan (IDP) – and explores the extent to which the IDP process can lead to good local governance. The assertion is that processes leading up to decision-making in the IDP process need to be more responsive to the needs of people and to the changes in the environment within which decisions are made and implemented. Those responsible for implementing decisions need to be held accountable and to feel the consequences of good or bad delivery.

Improved responsiveness and responsibility together contribute to good governance, which in turn leads to an improved quality of life (Atlee 2012; Gisselquist 2012; MAV et al. 2012; Goodin 2008; Liu and Hanauer 2011).

After unpacking the meaning of good governance, a brief overview of the local government IDP process is provided, and the Mthatha revitalisation case study is used to highlight issues within an IDP process. The challenges to the IDP process are considered, and then recommendations are made for making the IDP process more responsive to the needs of the citizens and making those responsible for implementation more accountable.

THE MEANING OF GOOD GOVERNANCE

Governance refers to the formal and informal arrangements that determine how public decisions are made and how public actions are carried out from the perspective of maintaining a country's constitutional values (OECD2011: 2). McGee (2004, cited in United Nations 2007) and the European Commission (2003, cited in United Nations 2007) argue that governance is not just about how government, social organisations and citizens interact but concerns the state's ability to serve citizens and other actors, and how public functions are carried out, public resources managed and public regulatory powers exercised.

Good governance is not a new concept in South Africa, being present in various pieces of legislation including Chapter 7 of the Constitution (Act No. 108 of 1996), the Municipal Structures Act (No.117 of 1998) and the Municipal Systems Act (No.32 of 2000).

Good governance is about decision-making and implementation processes, not about making 'correct' decisions, but about the best possible processes for making those decisions (MAV et al. 2012). It has seven sub-components or indicators¹ (Gisselquist 2012):

- * Democracy and representation.
- * Respect for human rights.
- * Respect for the rule of law.
- * Effective and efficient public management.
- * Transparency and accountability.
- * Development-oriented objectives.
- * A varying range of particular political and economic policies, programmes, and institutions (e.g. elections, a legislature, a free press, secure property rights) which give effect to the previous six components.

A government that follows good governance practice is one where all of the above components are in place. For the purposes of this paper, emphasis will be placed on some components over others, depending on the situation. For example, respect for democratic principles and community representation are important in the process leading up to decision-making, whereas transparency and accountability take centre stage when implementing the decisions made.

As mentioned, local government is where most people are able to influence decisions and hold decision-makers to account. The concept of good governance is explored in the context of the IDP, the tool used by municipalities to coordinate all development interventions across sectors.

GOVERNANCE AND THE IDP

The framework of the IDP process is used to unpack responsive planning and responsible implementation. The process is not described in detail, as it can be found in a number of handbooks and guides (Afeis-coplan 2013a, DDP 2014, DPL nd, ETU nd, MLGI nd).

The Municipal Systems Act gives direction to the IDP process, describing the IDP as 'the principal strategic planning instrument which guides

and informs all planning and development, and all decisions with regard to planning, management and development in the municipality'. Communities should be encouraged to participate in municipal affairs, including preparing, implementing and reviewing the IDP. The IDP is seen as the opportunity and platform to ensure that local interests are captured and acted on. Therefore, IDPs that appear generic replicas may be an indication that the participation process has not been successful. The Act also mandates municipalities to produce five-year IDPs that must be reviewed every year. An IDP must include a long-term vision, a situational analysis, development priorities, a Spatial Development Framework, financial plans and budgets for the next three years.

In an ideal world, the municipality should use the following to inform the content of IDPs:

- ✦ Experiences gained from implementing previous rounds of the IDP.
- ✦ Promises found in the ruling party's election manifestos.
- ✦ The content of longer-term (15–20-year) development strategies.
- ✦ The needs and aspirations negotiated through ward committee structures and other recognised citizen-representative forums.
- ✦ The needs and aspirations negotiated through sector forums and reflected in sector plans.

The municipality also reviews the IDP annually, to take into account any changes in the global, national or local ecological and socio-economic environment, emerging opportunities and lessons from implementing previous projects. Following

the review, the IDP and its associated projects and budgets are modified. Where appropriate, project steering committees are established to guide project planning and implementation, with adjustments made to the implementation of these projects, as a result of any changes in the environment. Communities are supposed to be able to influence the content of the IDP and hold government to account through institutional structures such as ward committees, sector forums, IDP representative forums and project steering committees. In reality, and as experience shows, and as outlined in the following case study, the process of developing and implementing IDPs is not as smooth as the ideal process outlined above.

THE MTHATHA REVITALISATION PROCESS: A CASE STUDY

The Mthatha revitalisation process, which was initiated by former President Thabo Mbeki in 2008/09, is a typical example of the complexity of planning processes at local government level. Afesis-corplan was involved in this process and gained some valuable insights (Ngamlana 2010). The municipality's five-year IDP was already in place when the President initiated the revitalisation plan, which therefore had to be incorporated into the IDP.

The Mthatha revitalisation plan (or 'turnaround plan') covered only two towns (Mthatha and Mqanduli) within the broader King Sabata Dalindyebo Municipality. A team of experts drew up the plan and captured a long-term vision for Mthatha. The final revitalisation plan listed short-, medium- and long-term projects. For these projects to be undertaken, they had to be included in the IDP. Therefore, at the next annual review, the municipality revised the IDP, prioritising projects in the area covered by the revitalisation plan. Resources from both provincial and local government were allocated to the implementation of the revitalisation plan, matching the

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resources deployed by the Presidency. This resulted in contestation and unrest from communities within the broader community but outside the geographic area of the revitalisation plan. The contestation spilt over into the municipal council, where councillors representing wards outside the prioritised areas were up in arms over the process. Political infighting at the municipal level intensified in the battle for local resource allocation.

The revitalisation planning process was participatory, mobilising all the relevant stakeholders. A stakeholders' forum, or Local Strategic Partnership (LSP), came together to deliberate on the future of Mthatha and to hold one another accountable for their role in realising the city's vision. At the same time, the Office of the Premier of the Eastern Cape implemented a parallel process, setting up a separate provincial revitalisation task team to mobilise and coordinate investment and resources by the various provincial departments in Mthatha. However, these conversations, about the success and impact of various provincial government projects in Mthatha, happened outside the LSP. Even after finding out about the LSP, the provincial revitalisation task-team continued to hold separate meetings from the LSP and failed to hand over the monitoring functions for the implementation of provincial projects to the LSP.

The end result was that various competing interests hijacked a participatory, locally owned programme involving the citizens of Mthatha. Competing interests included those of the provincial government, individual stakeholders within the LSP and the citizens of the King Sabata Dalindyebo Municipality, of which Mthatha is only a part. No space existed (or was created) in which these competing parties could together find an amicable way forward that could best serve the interests of all.

A few years later, the revitalisation or turnaround plan is rarely talked about in Mthatha and in the

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Province. This is unfortunate, as the plan was responsive to the needs of the community (although it could have been more responsive to the broader Mthatha community), and a mechanism was put in place, through the LSP, to ensure that those responsible for implementation would be held accountable. The subsequent abandonment of the LSP, without creating an alternative multi-stakeholder coordinating structure involving all competing parties, has meant that there is now no responsible structure able to ensure the implementation of the turnaround plan.

CHALLENGES TO AN EFFECTIVE IDP SYSTEM

In theory, citizen participation is meant to be an integral part of local government affairs and is a common thread running through the Constitution and related legislation (such as the Municipal Structures Act), and more recent government plans. The National Development Plan (NDP) states that 'active citizenry and social activism is necessary for democracy and development to flourish' (NPC 2012: 37). The state cannot merely act on behalf of the people but has to act with the people, working together with other institutions to provide opportunities for the advancement of all communities. The Back to Basics document of the Department of Cooperative Governance and Traditional Affairs (CoGTA) recognises local government's failure to connect with local citizens (CoGTA 2014) and the need to comply with legislation concerning community participation. This is a similar sentiment to the one

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expressed five years ago in the CoGTA Turnaround Strategy, which claimed that local government had become unresponsive to citizens' needs (CoGTA 2009).

In practice, as this section highlights, the IDP process fails to adequately support active citizenry and social activism, and to promote responsive planning and responsible implementation. Some of the reasons for this failure are explained below.

THE WARD COMMITTEE SYSTEM IS POLITICISED

The failure of the ward committee system – the key participation instrument established by government – to facilitate citizen participation has been recorded in detail (Afesis-corplan 2013b; Ngamlana and Mathoho 2013b). Not only do municipal councils not take ward committees and their concerns seriously, but also ward committees do not receive information necessary to be able to prepare in advance for council meetings and make input on critical issues affecting the communities they represent. In addition, ward committees are highly politicised, as a result of the struggle for access to power and resources within ward committee structures (Afesis-corplan 2013b).

The consequence of this failure is a poor buy-in to the IDP by local citizens and a missed opportunity to move towards the Constitution's vision of co-creation, where government is based on the will of the people. Continuing to base IDP processes on a participatory mechanism whose legitimacy has been widely questioned is absurd. Improved and/or alternative and creative mechanisms are needed to enable citizen participation in the IDP process.

SECTOR-PLANNING PROCESSES ARE POORLY ALIGNED TO IDP PROCESSES

Sector plans are another legislated mechanism for citizen participation in the IDP process. However, sector plans are often developed on an ad-hoc basis with limited community participation. Afesis-corplan's experience of public participation in sector planning (e.g. in the agricultural, energy, local economic development, housing, and spatial sectors) is that usually municipalities only call for participation on an ad-hoc basis, when they are developing new sector plans, and very few people attend these meetings. These meetings also do not form part of any systematic and on-going planning and review process (Eglin personal communication 2015²). Government itself has recognised that the weak development planning capacity in municipalities has resulted 'in municipalities unable to develop quality sector plans which are a cornerstone for the development of quality five (5) year IDPs' (The Presidency 2014: 6).

IDP MULTI-SECTORAL FORUMS ARE FOR INFORMATION, NOT DEBATE

IDP representative forum meetings, which are multi-sectoral, are also legislated. However, these meetings are usually poorly advertised and attended, and at times held with no proper preparation. The meetings are largely about municipalities informing communities of what they plan to do, without any meaningful interaction and debate (Ngamlana personal communication 2015³). Government acknowledges that citizen participation processes have 'too often become formulaic and symbolic' (The Presidency 2014: 3), and municipalities need to be better at consulting, communicating and feeding back to communities.

MONITORING AND ACCOUNTABILITY MECHANISMS FOR IDP IMPLEMENTATION ARE WEAK

Municipalities have weak project management systems, which makes it difficult for communities to participate in monitoring the implementation of the IDP and its associated projects. As communities often do not know who is responsible for implementing what and to what standard, the municipality and other stakeholders are able to shift the blame elsewhere, with no-one taking ultimate responsibility. Projects are rolled over from year to year without anyone being held to account for poor delivery. When people are identified as being accountable, action is rarely taken against them and they seldom face censure or consequences for their poor performance (Auditor-General 2013: 35; Ngamlana personal communication March 2015⁴).

Government has recognised the need for municipalities to pay far greater attention to ensuring that citizen engagement in IDP processes is more 'deliberative' (The Presidency 2014). Improved community participation in the planning process would make planning more responsive to the needs of the community. Much more needs to be done to improve community oversight and to make those responsible for implementation more accountable.

RECOMMENDATIONS FOR IMPROVING THE IDP PROCESS

The recommendations can be summarised within two broad categories. (1) To make IDP planning more responsive, the pre-decision-making process needs to be improved, by giving more people the opportunity to participate actively in the planning process and influence decisions. (2) To make IDP implementation more responsible, the post-decision-making process needs to be improved, by putting in place systems that clarify who is responsible for implementing which

aspects of the plan and at what stage of the process. Greater clarity is also needed of the consequences for failed (or successful) delivery, and what steps need to be taken to hold those responsible to account.

The following recommendations go into more detail regarding how to improve the IDP process to make planning more responsive and implementation more responsible.

REGULATE AND IMPROVE ACCESS TO INFORMATION

Access to information is a crucial enabler for making decisions about development. Citizen participation in decision-making is often limited because of the lack of critical information about the issue (Irvin and Stansbury 2004). Information management and access to information has to be a priority for government. The Promotion of Access to Information Act (PAIA) (No. 2 of 2000) may exist, but using this legislation is fraught with problems, as experienced by Afesis-corporation and others.⁵ For example, not receiving any response from government to PAIA requests despite numerous follow ups (Eglin personal communication 2015⁶). A recent study highlighted similar challenges with the processes provided for in the PAIA.⁷

What is missing in South Africa is a regulatory framework for government institutions and municipalities that outlines minimum standards and processes for managing information. The PAIA assumes that information is available for access, but this is not always the case. In the Eastern Cape, various provincial and municipal government departments do not even have a website to facilitate ease of access to public information (Hollands nd). A website is a statutory requirement for municipalities, but failure to comply with this bears no punitive measures, and so municipalities do not prioritise keeping such sites updated (Hollands nd).

REVIEW PARTICIPATORY MECHANISMS IN LOCAL GOVERNMENT

As outlined earlier, ward committees have failed to provide meaningful opportunities for citizens and municipalities to engage. This means that the current structures are not suitable to be used as the main mechanism through which citizens participate in the IDP. However, the problems facing local government are not going to be solved using the same thinking and mechanisms that created the problems in the first place (Ngamlana and Mathoho 2013a). Civil society has made many suggestions for modifying and improving ward committee structures, and for facilitating community participation and oversight in the IDP process, but few of these suggestions have been taken on board. As stated previously, instead of solely focusing on ward committees, the broad framework of the IDP process needs to accommodate opportunities for municipalities and communities to experiment and test different innovative participatory and accountability mechanisms.⁸ For example, with the help of the Social Justice Coalition, residents of the City of Cape Town were mobilised to make public submissions on the 2015/6 draft city budget. The city received 600 submissions from Khayelitsha residents alone, compared to only 37 submissions from across the whole city in the previous year.⁹

National government has recognised the limitations of ward committees but, unfortunately, continues to resist thinking out of the ward committee 'box'. In Outcome 9, government commits 'to deepen participatory democracy by facilitating the establishment of ward committees and strengthening their oversight function in terms of monitoring and reporting to community progress against the IDP and SDBIP [Service Delivery and Budget Implementation Plans] and ward service improvement plans/ward operational plan (The Presidency 2014: 12).

EXPLORE HOW TO IMPROVE SECTOR FORUMS

Public participation in sector forum meetings and in developing and implementing sector plans leaves much to be desired. Government needs to significantly improve how sector forums are established and participate in developing and reviewing sector-based plans and the IDP. Government needs to develop clear guidelines and procedures for the formation and operation of sector forums, learning from and improving upon those developed for ward committee structures.

Civil society organisations (CSOs) need to pay far more attention to building sector networks, so that they are able to engage in these sector forum planning processes.¹⁰ A starting point is greater collaboration between CSOs involved in good governance work and organisations and networks involved in the health, education, welfare, paralegal, gender, agricultural and other sectors, to encourage and support them to get involved in municipal IDP and sector planning processes.¹¹

IMPROVE IDP REVIEW PROCESSES

The annual IDP review process has become a tick-box exercise devoid of meaningful substance, rather than a strategic 'opportunity to seize unexpected opportunities, adjust to disappointments and discover ways around apparently insuperable barriers' (Wild et al. 2015: 46). This is understandable considering the rigorous IDP review process. Some municipal officials have noted that between one IDP review to the next, there is hardly any time for implementation and monitoring (Afesis-corporation 2014).

Municipalities need to be 'more open to adaptive planning approaches that acknowledge limited foresight and that are responsive to contextual changes and adaptive to lessons learned from implementation' (Hummelbrunner and Jones 2013:

9). For example, within the annual IDP review cycle, more attention could be given to reviewing achievements compared to objectives, before confirming the plans for the following year. Structured reflection, and learning and evaluation exercises need to be built into the planning cycle, so that lessons can be quickly incorporated into subsequent rounds of (re)planning. Municipal IDP processes could also include contingency planning exercises in the case of, for example, not securing certain funding or achieving expected economic growth (Hummelbrunner and Jones 2013: 10).

INCLUDE PARTICIPATORY MONITORING AND EVALUATION INTO THE IDP PROCESS

After an IDP has been developed, many stakeholders in the IDP process consider that citizens no longer need to be involved, as others will monitor IDP implementation (Ngamlana personal communication 2015¹²). No mechanisms exist to facilitate shared responsibility in implementation (Ngamlana 2010). Shared responsibility does not imply that government shifts its statutory obligation to citizens but rather allows for the creation of spaces for citizens' energies, experiences and knowledge to be used in IDP implementation. An example of a mechanism that could facilitate such shared responsibility is the LSP mentioned in the Mthatha case study (if it had been implemented as planned). Another example is the Social Audit methodology being implemented by the Social Justice Coalition¹³ (among others), which is a tool that communities can use to monitor the implementation of projects emerging from IDP planning processes.

For the past few years, the Presidency has been leading a process of developing a participatory monitoring and evaluation framework (DPME 2014). The post-decision-making processes of an IDP should be grounded in a similar participatory monitoring

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framework that appreciates the local municipal context and dynamics.

Government has already identified the need to establish an 'integrated monitoring system' for tracking the implementation of project pipelines (The Presidency 2013: 8). The implementation of this system needs to be monitored, and the public must be able to see what is in this system. Citizens should be able to access project management data that explains, for example, why certain projects are being stalled and who is responsible for addressing this bottleneck (Umhlaba Consulting Group 2013).

ALIGN PERFORMANCE CONTRACTS OF SENIOR MUNICIPAL STAFF WITH IDP TARGETS

Government should consider aligning key performance indicators and contracts of senior management staff to targets that have been set during the IDP process. Communities can then use these targets as a 'report card' against which to hold government officials accountable.

IMPROVE THE PETITION POLICIES OF MUNICIPALITIES

Section 17(2)(a) of the Municipal Systems Act requires municipalities to make provision for local communities to petition the municipality. However, currently, petition committees at various levels of government have failed to respond timeously to citizen grievances.¹⁴ At national level, Parliament's petitions committee only concluded one of 60 matters

raised by the public over a period of a year (PMG 2014). At local level, municipalities with which Afesis-corplan works often do not have a petitions policy or, if such a policy does exist, have long backlogs, and so frustrated citizens resort to using other means to raise their grievances (Ngamlana personal communication 2015¹⁵).

Therefore, government needs to create spaces for citizens to raise their grievances. Government's own studies have found that the rise in service delivery protests is a result of the lack of meaningful spaces for citizens to engage with the state about their grievances (CoGTA 2009, 2014). If government cannot handle petitions as a form of participation, other mechanisms must be found.

MAKE BETTER USE OF LOCAL MEDIA TO PROMOTE CITIZEN PARTICIPATION IN IDP PROCESSES

We live in an information and technological era (Castells 2010), and technology is advancing ever faster and becoming more and more accessible. Government and citizens need to make better use of local community radios, newspapers, cell phones etc. to share information and to facilitate citizen participation in IDP processes.¹⁶ It is not enough to inform people of the venue, if people cannot meaningfully participate at the IDP consultative meeting. This requires:

- ✦ Providing the presentations in time to allow for scrutiny and analysis.
- ✦ Facilitating the meeting in a way that recognises the dynamics of the citizens in the room (e.g. in certain communities sophisticated PowerPoint presentations can be a barrier to participation).
- ✦ Appreciating the voice of dissent in the room and allowing citizens to comment freely, frankly and honestly about their own development.

CONCLUSION

Many CSOs are already involved in much of the work outlined in these recommendations. These CSOs need to be more proactive in publicising and raising awareness within government, communities and the public about responsive planning and responsible implementation within the IDP (and other) processes. For example, CSOs should:

- ✦ Reflect on and write up case studies on the work they have done and are doing.
- ✦ Collaborate with sector networks, sharing information and experiences, and lobbying government for changes in legislation in support of improved governance.
- ✦ Meet with and engage government to present the case study findings and proposed recommendations for improving governance.
- ✦ Make better use of all forms of media (from social to commercial) to publicise their work.

CSOs need to be bold in presenting government with alternative participatory planning processes and governance accountability mechanisms. At the same time, government needs to appreciate civil society's creativity, experience and willingness to seek working solutions. CSOs also need to share best (and worst) practices in order to build on each other's experience, especially where the initiatives and campaigns are aimed at holding government to account.

For government, the IDP is a very useful framework around which to create more responsive development planning and more responsible implementation. What government now needs to do is to publicly (re)commit itself to positioning the IDP process as the cornerstone of local developmental interventions. Many in government need to shift their mindset, from viewing the IDP process as another legislative requirement to be 'ticked off', to realising

that an IDP should be an expression of government's developmental interventions and investment in a local municipal area. The IDP should not be seen as a static blueprint that municipalities are implementing, but rather as a framework and process for ongoing adaptation, learning and emergence (Hummelbrunner and Jones 2013: 9).

Government needs to provide the space and opportunities for municipalities, citizens and others to test and experiment with different development planning and implementation approaches within this broad IDP framework. Role-players involved in the IDP process can also use such experiments

to look at how to improve other components of good governance, ranging from intergovernmental relations, coordinated planning, the rule of law to effective and efficient public administration. Municipalities need to acknowledge that mistakes will be made and must be learned from not repeated.

To achieve truly responsive and responsible governance will require trial and error and experimentation with various integrated development planning and implementation procedures, at local level, municipality by municipality, and then collectively as a country.

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NOTES

- ¹ Extracted from definitions of good governance according to the United Nations, United Nations Development Programme, World Bank, African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development, Inter-American Bank, European Commission, International Monetary Fund and Organisation for Economic Co-operation and Development.
- ² Personal communication Ronald Eglin, 23 March 2015, East London.
- ³ Personal communication Nontando Ngamlana, 23 March 2015, East London.
- ⁴ Personal communication Nontando Ngamlana, 23 March 2015, East London.
- ⁵ For example: South African History Archives - <http://foip.saha.org.za/> ; Open Democracy Advice Centre - <http://www.opendemocracy.org.za/index.php/what-we-do/access-to-information/11-what-we-do/access-to-information> ; and the People's Assembly - <http://www.pa.org.za/info/petitions>
- ⁶ Personal communication Ronald Eglin, 23 March 2015, East London.
- ⁷ Centre for Environmental Rights (2013) Media Release: Disclosure of information at an all-time low, says PAIA Civil Society Network. <http://us7.campaign-archive2.com/?u=254d86bd82b4cf76270ee02fd&id=575b6c141b&e=c4fc91dd13> (accessed 10 April 2015).
- ⁸ For examples see the work of members of the Good Governance Learning Network www.ggln.org.za : and the Local Government In Action Initiative - <http://www.localgovernmentaction.org/>
- ⁹ *Times Live*, 2015, 600 Khayelitsha residents to hand over submissions on council budget. <http://www.timeslive.co.za/local/article14588071.ece>
- ¹⁰ One example of how this is being done is Afesis-corplan's Citizen/ Sector Support Platform work which is looking at building the capacity of sectors to position themselves to gain representation in ward committee structures (Afesis-corplan nd).
- ¹¹ Examples include Informal Settlement Network - <http://sasdialliance.org.za/isn/>; Eastern Cape Health Crises Action Coalition - <http://ehealthcrisis.org/>; National Alliance for the development of Community Advice offices - <http://nadcao.org.za/>, Eastern Cape NGO Coalition - <http://www.ecngoc.co.za/>
- ¹² Personal communication Nontando Ngamlana, 23 March 2015, East London.
- ¹³ See <http://www.sjc.org.za/social-audits> In terms of this methodology, citizens audit select services, such as sanitation services, at regular intervals, and provide feedback to the municipality on the quality of service delivery and progress on the roll-out of services.
- ¹⁴ Delgado M. By ignoring petitions, government encourages violent protest. http://groundup.org.za/article/ignoring-petitions-government-encourages-violent-protest_2776, 20 March 2015.
- ¹⁵ Personal communication Nontando Ngamlana, 23 March 2015, East London.
- ¹⁶ For example, see the work of the Non Profit Network <http://www.nonprofit-network.org/>; the Deepening Democracy Programme <http://ddp.org.za/programme-events/civil-society/media-communication/memorandum-of-understanding-signed-with-kzn-community-radio-hubandAfesis-corplanhttps://www.google.co.za/webhp?sourceid=chrome-instant&ion=1&espy=2&ie=UTF-8#q=afesis%20community%20radio>