

WATCH WHILE IT HAPPENS

THREE INTERVENTIONS FOR CIVIC OVERSIGHT OF PUBLIC PROCUREMENT

POLICY BRIEF OCTOBER 2026

Summary

This policy brief makes proposals for enabling greater civil society oversight of public procurement in South Africa. Conventional oversight arrives late, as shown by irregularities surfaced in audits long after contracts have been awarded and services have failed. Here PARI argues that civil society, communities and the public can be given a defined role in scrutinising public procurement.

Based on longer position paper, [‘Observe, Record, Report: Real-time Citizen Engagement with Public Procurement in South Africa’](#), this brief proposes three interventions that government can pilot immediately and scale as capacity grows. It proposes introducing civic observers for high value, high risk procurement; expanding the use of social audits of procurement processes; and enhancing transparency through the application of clear open data standards across procurement processes and systems. It also sets out the safeguards needed to protect community monitors, officials and the procurement process itself. These measures have been successfully used in several countries to improve the integrity and efficacy of public procurement. South Africa is already moving slowly in this direction. It has the institutional and civic capacity to pilot, and then embed, these transparent and participatory approaches.

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Introduction

Civic oversight is a potentially powerful tool for improving the integrity of supply chain management in the public sector. Oversight of public procurement is often undertaken ‘after-the-fact’: delayed visibility reduces the prospects of timely correction and meaningful deterrence, which can have serious implications for public accountability and service delivery. In this policy brief, we propose three interventions for improving civic oversight of public procurement, which government can pilot immediately and then scale for impact. Each is workable, evidence-based and designed to strengthen oversight without slowing down procurement:

- introducing civic observers for high value, high risk procurement, especially in sectors where there is public interest;
- expanding the use of social audits of procurement processes in the delivery of services that can be monitored at neighbourhood/community level; and
- enhancing transparency through the application of clear open data standards across procurement processes. The aim is procurement processes that can be followed from start to finish without confusion.¹

Three principles that contribute to strengthening oversight

Three principles underpin the interventions proposed in this brief: participation, transparency and accountability. The evidence shows that improving participation and transparency, and introducing structured accountability measures, together can produce more effective oversight and reduce procurement corruption. This part of the brief defines each principle, then shows how each has been applied, drawing on experiences from Mexico, the European Union, Colombia, India and South Africa.

Participation means giving people outside the procuring institution a defined role in oversight of the procurement system, with the access needed to scrutinise it, subject to safeguards. Depending on the oversight mechanism, these people may be drawn from affected communities, wider civil society or professional bodies, for example.

Transparency means routinely publishing enough information, in good time and in a usable form, so that the public can understand and monitor it. Publishing information that cannot be understood or enacted does not meet this standard.

Accountability means a defined relationship in which an official must explain and justify a decision to a specified body, that body can question and judge it, and consequences may follow.

These principles are mutually supportive. For example, transparency on its own is not accountability. This is why the brief proposes the three interventions as a package rather than a menu. Effective oversight that reduces procurement corruption comes from improving participation, transparency and accountability in combination. The examples below show how these principles and the mechanisms we propose been applied, internationally and in South Africa.

CIVIC OVERSIGHT IN PRACTICE

Several countries around the world have opened procurement processes to public monitoring while decisions are still being taken. These countries have found that adopting civic oversight in their procurement processes has resulted in fewer irregularities, greater competition and in some cases, savings on the contract price.²

Mexico has embedded independent ‘social witnesses’ in its highest value procurements, under rules that specify when a witness is used, what they may access, how they report and who must act.³ In the European Union (EU), integrity pacts have been piloted on major infrastructure projects, with civil society monitors working alongside contracting authorities and bidders.⁴ The pilots reduced irregularities and improved compliance without unnecessary burden.⁵

Colombia’s reforms, which aligned data to the Open Contracting Data Standard (OCDS), show how standardised disclosure can strengthen competition and oversight, with documented efficiency gains and programme-level savings.⁶

In India, the rural works programme requires regular community ‘social audits’.⁷ These are statutorily enforced open hearings where spending is reviewed in public and officials must respond.⁸ The model reduces delay and strengthens remedies.⁹

In South Africa, civil society has decades of practice in this role, from budget-transparency advocacy by the International Budget Partnership (IBP)¹⁰ to sanitation and safety audits by the Social Justice Coalition (SJC).¹¹ And the International Budget Partnership’s Asivikela initiative elicits regular municipal responses to service failures reported by residents.¹²

These examples provide evidence that strengthening participation, transparency and accountability, and using them in combination, works to improve oversight. They show both the variety of ways these principles can be actioned and their adaptability to South African conditions.

National Treasury is already piloting greater procurement transparency through its publicly accessible Procurement Payments Dashboard.¹³ The spirit of this initiative should be expanded to ‘real-time’ oversight of public procurement.

Proposed interventions

We propose three interventions based on the three principles outlined above: civic oversight, social audits and data transparency. The Public Procurement Act 28 of 2024 provided a statutory basis for all three interventions: section 30 required the Minister to make regulations enabling the public, civil society and the media to access, scrutinise and monitor procurement processes, and sections 28 and 31 required standardised, interoperable disclosure through a free central online portal. These were useful foundations from which to build civic oversight. But piloting and expanding the mechanisms we propose need not wait for a new regulatory regime.¹⁴ South Africa has everything it needs to pilot these interventions NOW.

The interventions can be implemented under existing regulatory conditions. National Treasury already uses existing powers under the Public Finance Management Act (PFMA) to issue instructions, practice notes and guidance.¹⁵ These can be used to set minimum publication timelines and require end-to-end disclosure in open, machine-readable and interoperable formats. And as shown above, South Africa has already experimented with social audits through government-civil society partnerships.

Intervention 1: Civic observers

What it is: Civic observers are independent people from civil society organisations, professional bodies or academia who watch defined stages of a procurement process, review the documents, and publish a short report on whether the rules were followed.¹⁶ They observe and record. They do not score bids, make decisions or try to influence the outcome. Because the record is made while deliberations and procedural steps occur, it produces a clearer audit trail, helps resolve factual disputes early and reduces the scope for records to be reconstructed after the fact, when the incentive to rationalise or sanitise events is stronger.

When to use it: Observers should not be used everywhere at once – neither government nor civil society has this capacity. Rather a threefold test could be used: how severe the risk of impropriety is (including as related to the value of the contract), how strong the public interest is in mitigating that risk, and the capacity available to act as civic observers. This test can inform regulations prescribing categories of procurement and value thresholds where observers are mandatory, starting narrowly. Water and sanitation infrastructure meets all three and is a strong candidate for the first pilot. The categories can be widened and the threshold lowered as capacity grows.

Stages: Observers should be involved from the point a procurement need is identified, through planning, bid specification and adjudication, and into contract delivery.

How: Lessons from early pilots can be used to set clear regulations. Regulations should address the following:

Requirements for people to be registered as civic observers, such as completing a short, accredited course, declaring their interests and signing a code of conduct. At least two observers should be appointed to each qualifying procurement, preferably from different organisations.

Regulations should outline what they do, what triggers their involvement, and what they can see. Observers should be involved from the start of the procurement process through to contract management, with full access to deliberations and documents. Safeguards should protect candid internal discussion, confidential information, and officials from abuse or intimidation – and those safeguards should be written into the observers' code of conduct, not applied case by case at officials' discretion, which invites both over-restriction and abuse.

Regulations should outline what civic observers produce. Observers publish short, standardised reports within a set period after each stage observed, stating whether prescribed procedures were followed, what deviations occurred and what explanations were given, and identifying red flags. The procuring institution must respond in writing within a similar period, setting out corrective steps or reasons for disagreement.

What happens when problems are found. Where reports identify serious procedural irregularities, obstructed access, repeated non-compliance or no response, escalation should run through the PPO, using the enforcement framework that already exists rather than creating a parallel one.

Civic observers do not suspend awards or replace formal review. They document concerns and trigger a structured response, enabling early escalation and course-correction. This helps shift oversight from retrospective audit to real-time risk mitigation. Both the observer's report and the institution's response should be published on a central procurement portal, linked to the relevant procurement record and accessible to the public.

Intervention 2: Social Audits

What it is: A social audit is a community-led review of whether contracted goods, services and infrastructure were actually delivered as promised. Residents compare what the contract says against what they can see on the ground: was the water tanker there, was the toilet serviced, was the refuse collected, on what schedule.

Social audits combine a documentary review with on-site verification of contract delivery,¹⁷ and typically end with a public meeting where findings are presented and officials are invited, or required, where the law provides, to respond.¹⁸ They are not primarily an 'anti-corruption' tool. Their main aim is to improve service delivery by letting the people receiving a service verify its quantity, quality, and location. If fraud or corruption surfaces in the process, that is an important additional benefit rather than the point of the exercise.

When they should be used: Social audits work best where delivery is frequent, place-specific and easy to see. That points to outsourced basic services in informal settlements, for example, water delivery by tanker, toilet provision and servicing, desludging, refuse removal, and to local water and sanitation infrastructure projects. Communities and civil society organisations should also be able to request an audit where there are credible risk signals, such as major cost overruns, repeated extensions of the contract, persistent non-delivery, or emergency awards.

Stage: Social audits occur during the contract delivery state and should be timed to key delivery points and routine performance reporting cycles, so problems are caught while they can still be fixed.

How: Residents need information they can actually use. Information should be shared proactively at the start of the contract and maintained as a standing reference during delivery. It should be available through simple offline channels such as ward councillor offices and noticeboards, community meetings and local depots, alongside online publication,¹⁹ because key delivery details are often hard to locate in standard procurement disclosures and many community monitors face connectivity or device constraints.²⁰

The information should be accessible in the most widely spoken local languages.²¹ A standard template should be prescribed and officials trained to use it. The contractor should be introduced on site at the start of the contract, with the ward councillor or another local interlocutor present.

For each affected contract and settlement, the published information should set out:

- **who delivers what, where and when**, naming the prime contractor and any significant subcontractors, including the service-provider branding residents will see on vehicles, uniforms and site signage;²²
- the **agreed service standards and schedules**;
- the **municipal official responsible** for contract management and invoice certification;
- **practical guidance** on how residents can raise and, if necessary, escalate implementation problems; and
- how communities and civil society organisations can **request an audit of a contract** where credible risk signals exist.²³

Site-visit protocols like identity verification, safety briefings, coordination with site managers should protect both monitors and project staff. Good-faith errors in community reporting should not attract civil or criminal liability.²⁴

Without an official response, social audits become performative. Procuring institutions should be required to respond in writing within a set, reasonable timeframe, stating what corrective steps they will take and when, or why they disagree. Where an institution does not respond, escalation should follow. The meeting that closes the project should ideally be run as joint problem-solving forum, with officials attending, engaging and agreeing corrective actions and timelines.

Intervention 3: Open data standards

What it is: An open data standard means each procurement can be followed from start to finish without confusion. Transparency is essential to the procurement oversight system: without timely, standardised, machine-readable data, civic observers, social auditors and others with a role in oversight lack the information they need.

The Open Contracting Data Standard (OCDS) captures and publishes standardised data across the planning, tender, award, contract and implementation stages, and is a useful benchmark.

²⁵ National Treasury already publishes some OCDS-compliant datasets, and the Office of the Chief Procurement Officer's publication policy commits to using the standard.²⁶ The model should be adapted to South Africa's system rather than adopted indiscriminately.

Take the example of a tender for water infrastructure. Today a resident who wants to follow it may find the advertisement on one system, the award on another, and no record of what was eventually paid to a service provider. If that procurement process is given a single reference number that stays with it from the planning stage to the final invoice, the whole story can be read in one place. Do the same for company names, and it becomes possible to ask which supplier wins the most work across departments, or whether two bidders share a director.

When it should be used: Open data standards should be the default setting for the whole procurement system, not something switched on for particular categories or above a value threshold. What phases in, so to speak, is the dataset: publication should start with a minimum set like plans, tender documents, evaluation outcomes, awards and signed contracts; and expand to contract variations, payments and delivery results as systems mature.

Stage: The whole procurement lifecycle, from planning to completion. End-to-end disclosure is the aim; award information alone is therefore not sufficient.

How: Government should name one standard as the governing framework for procurement data and hold to it. In practice this means:

- every process carries a single public identifier from planning through delivery, with all related records linked to it;
- buying institutions and suppliers, including joint ventures and significant subcontractors, are always named the same way, using stable reference numbers;
- publication is readable by both people and machines;
- information appears on simple web pages, is downloadable in bulk, and has permanent web addresses so records can be cited and revisited;
- disclosure is phased in through achievable legal requirements; and
- the PPO publishes simple data-quality dashboards at institution level, using automated checks to flag gaps early. Making data quality visible helps institutions improve and gives oversight bodies confidence that the data can be relied on.

National Treasury is already supporting government bodies to collect and publish more procurement data, putting the scaffolding for transparency in place so that practice can be institutionalised progressively. These developments are welcome. What is now needed is a clear commitment, in regulations and in practice, to open contracting data standards across the system.

Safeguards for civic society oversight

Opening procurement oversight to community monitors and civil society observers, and expanding data disclosure, carries risks. These include intimidation and retaliation, the misuse or misinterpretation of information, slow-downs in the procurement process, and inconsistent responses by institutions that might undermine the value of civic oversight. So we recommend a set of risk-based safeguards across the three interventions.

Safeguards should be proportionate to risk, judged by the risk of impropriety and the value at stake.²⁷ That principle should set the limits of information requests, audit work, reporting obligations and remedial action. In practice, high-risk or high-value matters warrant deeper scrutiny and enhanced disclosure, while low-risk settings follow simpler processes.

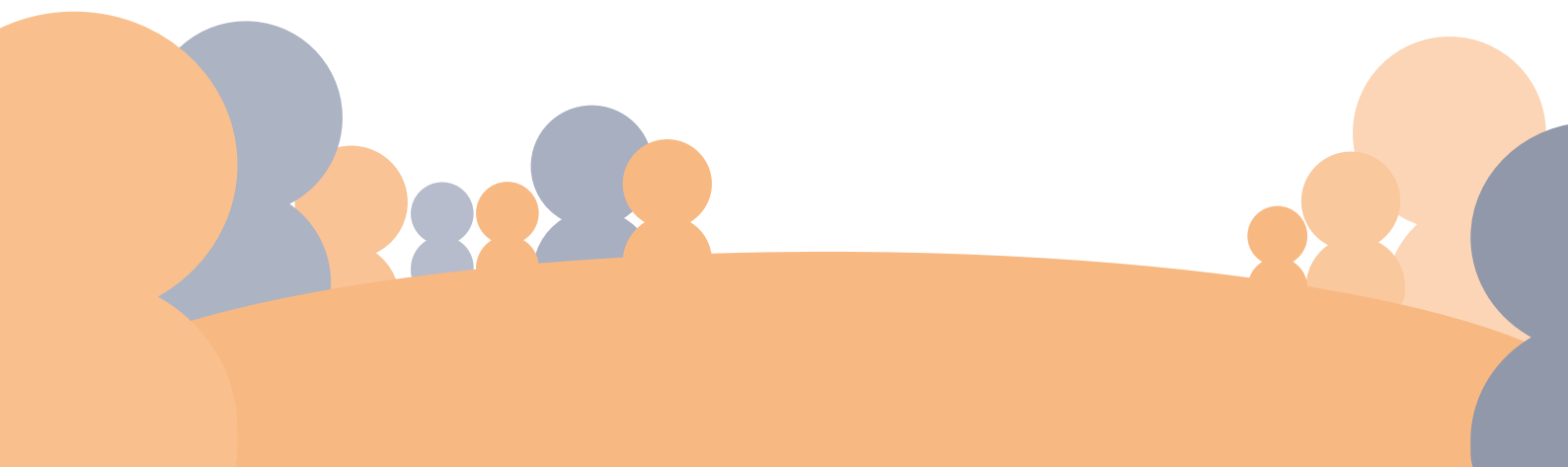
We recommend clear, time-bound standards²⁸ across the procurement oversight lifecycle, as supported by international practice. Time limits protect the procurement process as much as they protect oversight, since they cap how long scrutiny can hold up an award. Time limits can look like:

- prompt acknowledgement of reports and disclosures; the screening of red flags;²⁹
- including a standstill period that enables review before a contract is signed;
- the initiation and completion of social audits within set windows;
- reasoned responses to findings; and
- the implementation of remedial action by defined deadlines.

The use of civic observers for high stakes procurement needs a dedicated reporting channel which may be based in the Office of the Chief Procurement Officer (OCPO). It should accept anonymous submissions, give each report a case number, triage promptly, track progress and publish sanitised outcomes.³⁰ Robust anti-retaliation protections must explicitly cover suppliers, subcontractors, consultants, civic observers and community members acting in good faith.³¹

Conclusion

Government does not need to wait for the Public Procurement Act to commence to pilot these civic oversight mechanisms. Piloted now, evaluated independently and widened as capacity grows, these interventions would shift oversight from retrospective audit to real-time risk mitigation, catching problems early and providing practical feedback that can improve delivery outcomes.



Endnotes

- 1 This policy brief is based on PARI (2026) '[Observe, Record, Report: Real-time citizen engagement with public procurement in South Africa](#)'. PARI State Reform Position Paper. Johannesburg: Public Affairs Research Institute.
- 2 For a more detailed overview of some of this literature, see page 6 of the full position paper, 'Observe, Record, Report'.
- 3 Transparency International '[Integrity Pacts](#)', Blog post; Secretaría de la Función Pública, Mexico (2004) Acuerdo por el que se establecen los lineamientos que regulan la participación de los testigos sociales en las contrataciones que realicen las dependencias y entidades de la Administración Pública Federal. Diario Oficial de la Federación, 16 December 2004; Presidencia de la República, Mexico (2021) [Ley de Adquisiciones, Arrendamientos y Servicios del Sector Público art 26 Ter](#); OECD (2013) [Fighting Bid Rigging in Public Procurement in Mexico: A Secretariat Analytical Report on Legislation, Regulations and Practices Relating to Procurement Undertaken by ISSSTE](#): pp. 51-52. (PARI used Google Translate for assistance with translation here and elsewhere.).
- 4 Transparency International (2016) [Integrity Pacts: Civil Control Mechanism for Safeguarding EU Funds](#). A Transparency International project.
- 5 Pring, C., S. Mulcahy and J. Olaya (2022) [End-of-Project Evaluation of Transparency International's Integrity Pacts EU Project](#). TI-EU Report. Berlin: Transparency International; [Directive 2014/24/EU](#) of the European Parliament and of the Council on public procurement (2014) OJ L 94/65.
- 6 Gade, I.R., N. Penagos and S. Brown (2020) '[Case Study 6: Open Contracting Reforms in Colombia](#)', in R. Bajpai and B. Myers (eds) [Enhancing Government Effectiveness and Transparency: The Fight Against Corruption](#), pp. 84-88. Kuala Lumpur: The World Bank. Discusses SECOP II's standardised disclosure, including publication in OCDS format, and early evidence of increased competition; notes estimates that single-bid contracts are more expensive, implying savings where competition increases; M. Poisson (2021) '[Open Contracting: An illustrative form of open government in education](#)'. IIEP Policy Brief: Open Government in Education No. 3. Paris: UNESCO International Institute for Education Planning. Reports that opening Bogotá's School Meals Programme contracting through SECOP was associated with quadrupled bids and estimated savings of 10-15 per cent.
- 7 Viksit Bharat – Guarantee for Rozgar and Ajeevika Mission (Gramin) Act, 2025 (India) s 20 (social audits by Gram Sabhas), in force from 1 July 2026; see [Government of India, Press Information Bureau, commencement notification](#). The Act replaced the [Mahatma Gandhi National Rural Employment Guarantee Act 42 of 2005 s 17](#), repealed from the same date.
- 8 Viksit Bharat – Guarantee for Rozgar and Ajeevika Mission (Gramin) Act, 2025 ss 20, 23-24 (social audit, weekly public disclosure and dashboard-based monitoring); previously Mahatma Gandhi National Rural Employment Guarantee Act 42 of 2005 s 17 and Government of India, Ministry of Rural Development, [The Mahatma Gandhi National Rural Employment Guarantee Audit of Schemes Rules](#) (notified 30 June 2011).
- 9 Aiyar, Y., S.K. Mehta and S. Samji [Strengthening Public Accountability: Lessons from Implementing Social Audits in Andhra Pradesh](#). Accountability Initiative Working Paper: pp. 23-25, 32-36 (evaluating social audits under the former MGNREGA regime).
- 10 IBP-SA (2023) [Open Budget Survey](#): pp. 6-9 (South Africa's ranking and open budgeting performance).
- 11 SJC (2013) [Report of the Khayelitsha Mshengu Toilet Social Audit](#): pp. 4-7.
- 12 IBP-SA, [Asivikelane: Helping South Africa's informal-settlement residents' voices be heard](#). Blog post; IBP-SA (2025) [Reimagining Procurement Transparency for Basic Services in Informal Settlements](#): pp. 1-2.
- 13 Can be accessed at: <https://data.etenders.gov.za>.
- 14 At the time of writing this policy brief, the Constitutional Court had just set aside the Public Procurement Act of 2024 on the grounds of inadequate public participation.
- 15 A recent example of National Treasury exercising its prescriptive powers to enhance procurement transparency is [PFMA SCM Instruction No. 11 of 2025/26: Enhancing Procurement Information Transparency](#) (signed 28 January 2026; effective 1 April 2026). The Instruction requires institutions to report contracts above R1 million within 30 days of signature and contract variations within 30 days, and to publish annual procurement plans and any amendments to them. We argue that the [Municipal Finance Management Act 2003](#) may be used similarly – we engage in greater detail on this point in the full position paper on which this brief is based.
- 16 OECD (2016) [Country Case: Social witnesses in Mexico](#); Transparency International (2013) [Integrity Pacts in Public Procurement: An implementation guide for government officials](#): p. 9; Republic of the Philippines, Republic Act No. 12009 (New Government Procurement Act, 2024), provisions on observers (at least two observers invited at all stages, one from a relevant private group and one from a civil society or people's organisation, with prescribed reporting).
- 17 GTAC (2016) [A Guide to Conducting Social Audits in South Africa](#) (July 2016): pp. 9-11.
- 18 GTAC (2016) [A Guide to Conducting Social Audits in South Africa](#) (July 2016): pp. 9-11.
- 19 IBP-SA (2025) [Reimagining Procurement Transparency for Basic Services in Informal Settlements](#): pp. 1-2, 16.
- 20 IBP-SA (2025) [Reimagining Procurement Transparency for Basic Services in Informal Settlements](#): pp. 1-2, 16.
- 21 Mailovich, C. (2025) 'Fighting corruption in water and sanitation services: A South African perspective', in S. Williams, M.K. Kapardis and L.A. Kihl (eds) [Routledge Handbook of Gender and Corruption](#), pp. 297-298. Abingdon, U.K.: Routledge.
- 22 International Budget Partnership (2025) [Public Procurement: A Guide to Common Risks and How to Address Them](#): pp. 22-23 (contract management; comparing delivery to contract terms and verifying service-provider identity, including where subcontractors are involved).

- 23 International Budget Partnership (2012) [Social Audits as a Budget Monitoring Tool](#): pp. 5–6; GTAC (2016) [A Guide to Conducting Social Audits in South Africa](#): pp. 9–11. Risk signals include major cost overruns, repeated extensions, persistent non-delivery, or emergency awards.
- 24 Transparency International (2018) [A Best Practice Guide for Whistleblowing Legislation](#) (protection for disclosures made in good faith, irrespective of whether the information proves accurate).
- 25 OECD/World Bank/AfDB (2024) [Assessment of South Africa's National Procurement System](#): pp. 86–88; National Treasury, Office of the Chief Procurement Officer, 'Data User Guide – Office of the Chief Procurement Officer eTender Portal', eTender Transparency Portal / Publication Policy.
- 26 National Treasury, Office of the Chief Procurement Officer, [Data User Guide – Office of the Chief Procurement Officer eTender Portal](#), eTender Transparency Portal / Publication Policy.
- 27 OECD (2017) [Recommendation of the Council on Public Integrity](#) paras II, VII.
- 28 UNCITRAL (2011) [Model Law on Public Procurement](#) art 22(2)–(3) (standstill period and notice); European Commission, 'Remedies Directives' (10-day standstill period).
- 29 UNCITRAL (2011) [Model Law on Public Procurement](#) art 64–67 (challenge and review procedures, including time limits for acknowledgement and reasoned response).
- 30 Transparency International (2018) [A Best Practice Guide for Whistleblowing Legislation](#): 23–24, 38.
- 31 Transparency International (2018) [A Best Practice Guide for Whistleblowing Legislation](#): 28 (Principle 29: sanctions for retaliation and interference); 38–39 (follow-up mechanisms and protection duties).