

# From stings to wings

## Integrity management and the Directorate for Priority Crime Investigations

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*South Africa's new elite police unit, known as the Hawks, has been created in the midst of political change. Objectors have criticised its location in the SAPS, saying that the integrity of the unit, and its ability to conduct politically neutral investigations, may be compromised by its location. Legislation enabling the unit's formation provides for measures to test the integrity of its members. This legislation will need to be coupled with effective leadership characterised by integrity if the unit is to live up to and exceed the image and accomplishments of its predecessor, the Scorpions.*

On 6 July 2009, the Minister of Police, Nathi Mthethwa, launched the Directorate for Priority Crime Investigations (DPCI), led by Deputy National Commissioner Anwa Dramat. The DPCI replaces the Directorate for Special Operations (DSO) as the country's elite criminal investigation unit. Like the Scorpions, the new directorate has been given an attention-worthy nickname, the 'Hawks'.

In many respects the Hawks will pick up where the Scorpions left off. At least this is the message the Minister has tried to convey to the public, symbolised in the official handing over of 288 Scorpions case files to Dramat at the unit's launch.<sup>1</sup> Mthethwa has said that the Hawks will inherit another 351 cases, and that 218 of the former 244 remaining Scorpions investigators have joined the new unit.<sup>2</sup> These statements and the handover ceremony are important, considering the context of scepticism surrounding the establishment of the unit.

Launched in 1999, the Directorate for Special Operations (better known as the 'Scorpions') was formed through the National Prosecuting Authority (NPA) Amendment Act 61 of 2000, locating the unit in the NPA, itself part of the Department of Justice and Constitutional Development. Mandated with investigating serious organised and priority crimes, the Scorpions employed a unique prosecution-led approach to investigations, employing teams comprised of prosecutors, investigators and information-gathering analysts. The unit was widely revered for the effectiveness and integrity of its members, and for its high prosecution rate.

Against its brief record, government's February 2008 announcement of plans to dissolve the Scorpions and create a new unit within the South African Police Service (SAPS) was widely opposed by opposition parties and a group of ANC members.<sup>3</sup> The ANC justified the move stating that by combining the Scorpions and the

SAPS Organised Crime Unit and locating the new unit in the SAPS, the state would be better equipped to suppress organised crime.<sup>4</sup> This was despite the recommendation by the Khampempe Commission of Inquiry into the mandate and location of the DSO that the unit remain in the NPA (see South African Crime Quarterly No 24, June 2008 for a number of articles relating to the reasons for the closure of the Scorpions).

By April 2008 closure of the Scorpions took on momentum as allegations were made of it being a rogue structure among the state's security apparatus. As the then ANC Chief Whip (now Minister of Police), Nathi Mthethwa put it at the time:

The correct mandate of the Scorpions was sacrificed on the altar of the advancement of narrow political agenda by the former apartheid agents, evident in the operational style since its inception. The ANC's decision on the incorporation of the Scorpions into the SAPS will strengthen the fight against crime by ensuring the integration of all policing functions under a single structure. This is consistent with Chapter 11 of the Constitution.<sup>5</sup>

The ANC's stance grew in popularity among sections of the ANC-supporting public who saw the Scorpions as unfairly targeting members of the ruling party, in particular its would-be president, Jacob Zuma. Opposition parties and civil society groups continued to condemn the move as irresponsible and an abuse of power until 6 April 2009 when evidence suggesting political interference by Scorpions head Leonard McCarthy was made public. The evidence in the form of electronic recordings allegedly reveals McCarthy and then NPA head, Bulelani Ngcuka, strategising around the timing of re-charging Zuma. In announcing the NPA's subsequent decision to withdraw charges against Zuma, National Director Mokotedi Mpshe commented:

In the present matter, the conduct consists in the timing of the charging of [Jacob Zuma]... Mr McCarthy used the legal process for a purpose outside and extraneous to the

prosecution itself... Mr McCarthy, who was head of the DSO, and was in charge of the matter at all times and managed it almost on a daily basis, manipulated the legal process for purposes outside and extraneous to the prosecution itself... What Mr McCarthy did was not simply being over-diligent in his pursuit of a case, it was pure abuse of process.<sup>6</sup>

The emergence of the tapes subdued opposition to the Scorpions' dissolution, and smoothed the way for the establishment of the Hawks. However, the allegations against McCarthy have received little public attention and the former Scorpions are still remembered favourably in many quarters.

Perhaps the most contentious element of the Scorpions-Hawks transition is the location of the new unit within the South African Police Service. While most South Africans perceived the Justice Department-based Scorpions as highly trustworthy, efficient and independent, the SAPS (located in the Ministry of Police) still struggles to win the confidence of significant portions of the population. Although often unsubstantiated, a rich public discourse relating to perceived corruption in the SAPS is saturating the country.<sup>7</sup> The fact that former National Commissioner of Police and political appointee, Jackie Selebi, is on trial for corruption and fraud has not helped matters. While the Scorpions had led the investigation against Selebi, the Hawks, as part of the SAPS, will report directly to the new National Commissioner. This apparent lack of independence was cause for concern among critics of the new unit's structure.

## SHAPING THE HAWKS

The SAPS Amendment Act of 2008 provides for the establishment of the DPCI. In an attempt to ensure the integrity of the new unit and assuage public concerns over lack of independence, the Amendment Act provides strict guidelines for integrity, recruitment, accountability, and the transfer of powers from the DSO to the DPCI. Some of these represent significant improvements when compared to the NPA Act.

With regards to the founding of the unit, subsection 17b of the Act reads (emphasis added by the authors):

In the application of this Chapter the following should be recognised and taken into account:

- (a) The need to establish a Directorate as a Division of the Service to prevent, combat and investigate national priority offences, in particular serious *organised crime, serious commercial crime, and serious corruption*
- (b) The need to ensure that the Directorate –
  - (ii) has the necessary independence to perform its functions

AND

- (iv) is staffed through the transfer, appointment, or secondment of personnel *whose integrity is beyond reproach*

At the unit's launch, Dramat said that 1 700 potential members from the Commercial Crimes Unit, the Organised Crime Unit and the Hi-Tech Centre, had been screened for admission to the Hawks, and that another 1 300 would be screened over the next year. These statements suggest an attempt on the part of the SAPS to ensure and highlight the (intended) integrity of the unit. These intentions are supported by strict recruitment and vetting procedures allowed for by the amended Act.

Section 17(e) of the Act, titled 'Security screening and integrity measures' provides a legal framework for the standards of integrity by which the unit will operate – a crucial element by which it will be judged. According to this Act, any person considered for appointment to the unit will have to undergo a security screening investigation, and may undergo further screening at any time, as illustrated by the following excerpt (emphasis added by the authors):

- (1) Any person who is considered for appointment in, or secondment to, the Directorate, *shall be subject to a security screening investigation* in terms of and in accordance with section 2a of the National

Strategic Intelligence Act, 1994 (Act No. 39 of 1994).

- (2) *No person may be appointed to the Directorate unless –*
  - a. A security clearance has been issued to that person in terms of section 2a(6) of the National Strategic Intelligence Act, 1994, by the Head of the Crime Intelligence Division of the Service; or
  - b. A security clearance on the required level and which is still valid has been issued to the person in question in terms of section 2a(6) of the National Strategic Intelligence Act, 1994; or
  - c. A temporary security clearance has been issued by the Head of the Crime Intelligence Division of the Service after the person had submitted an application to the Head of the Crime Intelligence Division to have a security screening investigation conducted.
- (3) Any appointment on the basis of a temporary security clearance shall be subject to the finalisation of the security screening investigation and the issuing of a security clearance in terms of section 2a(6) of the National Strategic Intelligence Act, 1994.
- (4) *Whenever the Head of the Crime Intelligence Division of the Service* in terms of section 2a (6) of the National Strategic Intelligence Act, 1994, upon reasonable grounds, *degrades, withdraws or refuses a security clearance, the National Commissioner may transfer such person from the Directorate, or if such person cannot be redeployed elsewhere in the Service, discharge him or her,* subject to the provisions of section 34.
- (5) *A member of the Directorate may from time to time, or at such regular intervals as the Head of the Directorate may determine, be subjected to a further security screening investigation.*
- (6) *If, upon information at the disposal of the Head of the Directorate, he or she reasonably believes that the person*

*concerned poses a security risk, he or she may require the member to undergo a further security screening investigation.*

- (7) a. *Any member of the Directorate must, in the prescribed manner and at the prescribed intervals, disclose his or her prescribed financial and other interests and those of his or her immediate family members.*
- b. For the purpose of paragraph (a) 'immediate family members' refers to the spouse, civil partner or permanent life partner of that member and includes dependent children of and dependent family members living in the same household with that member.
- (8) a. *The Minister may prescribe measures for integrity testing of members of the Directorate, which may include random entrapment, testing for the abuse of alcohol or drugs, or the use of polygraph or similar instrument to ascertain, confirm or examine in a scientific manner the truthfulness of a statement made by a person.*
- b. The necessary samples required for any test referred to in paragraph (a) may be taken, but any sample taken from the body of a member may only be taken by a registered medical practitioner or a registered nurse.
- c. The Minister shall prescribe measures to ensure the confidentiality of information obtained through integrity testing, if such measures are prescribed in terms of paragraph (a).

Implemented responsibly and correctly, Section 17(e) could firmly bolster the integrity of the Hawks, both by helping to prevent members vulnerable to corrupt, criminal or dishonest behaviour from entering the unit, and by raising the likelihood of their exposure, should members pursue self-enriching illicit activities. Paragraph 8 (a) in particular, with its provision for random integrity tests,<sup>8</sup> including entrapment and polygraph tests, adds a new and important dimension to the governance of the unit. Similar provisions applicable to the broader service would

significantly bolster the tools available in the organisation's efforts to restrict corruption in its ranks. However, concern has been raised that the strict recruitment and screening criteria could be abused to prevent former Scorpions and other members perceived as politically incompatible from entering the unit.<sup>9</sup>

Section 17(e) effectively constitutes negative preventative measures. They represent necessary but hard-line, sometimes invasive and potentially threatening tools through which the SAPS can monitor Hawk members. On the other hand, good, positive management cannot be legislated but will be imperative if the integrity of Hawks members and their actions are to be maintained. Integrity is to an extent influenced by morale, making it important that the SAPS manage the personal transitions of members from other units into the Hawks, most importantly those moving from the Scorpions for whom the relocation might at first be viewed as a career regression.

## INTEGRITY MANAGEMENT

One of the primary tasks of managers in any organisation or unit is to shape the actions of employees to serve the organisation's interests.<sup>10</sup> Leaders can influence the values and actions of those around them through strategic emphasis of select rules, laws and, in particular, *behaviours*.<sup>11</sup> Through their actions, managers set the 'moral tone' for subordinates to follow.<sup>12</sup> Depending on the integrity and outlook of the leaders this may result in either positive or negative outcomes.

At some level 'integrity' can be considered a relative concept. Parry and Proctor-Thomson point out that to many in his party, Hitler would have been a man of impeccable integrity, despite his actions being grossly unethical.<sup>13</sup> In this vein it will be the actions and behaviour of Hawks leaders and members that will be most important in establishing and maintaining an image of unshakable integrity. This can be achieved by employing the 'hard' targeted interventions allowed for by the Act, such as security vetting, and integrity and polygraph tests, but also by

employing 'soft', culture-forming strategies. Both these avenues rely on good, ethical leadership. Cele, Dramat, and senior Hawk leadership need to 'define the reality' of the Hawks through instilling a vision based on sound values, and constructing an organisational reality around that vision.<sup>14</sup>

## ORGANISATIONAL VALUES

The SAPS is an enormous (180 000+) organisation composed of members representing almost every aspect of South African society. As such, its organisational culture is influenced by the *principles and values* of the broader government and society.

Values are understood as being learned, predominantly during childhood, and generally reflect the normative interpretations of right and wrong within a particular societal context.<sup>15</sup> This poses a challenge in South Africa where it has been said the country suffers from 'moral decay'. At the 2008 National Anti-Corruption Summit Archbishop Tlhagale ended his address stating that 'a widespread practice of crime and corruption precipitates society into a state of moral decay at the expense of the wellbeing of society itself'.<sup>16</sup>

Immanuel Kant's principle-based approach to ethics posits that the value of an act is determined by the principle on which it is performed. He believed such an approach would mitigate against violations that might occur through action based on unsound *values*. In this sense, documents like the South African Constitution and the SAPS Code of Conduct serve as *platforms of principles* from which the Hawks should operate. However, members of an organisation or unit such as the Hawks often come to their posts already socialised to a particular moral system. If, in this context, managers fail to capitalise on these divergent beliefs to create a strong, shared vision, fractures in moral culture emerge, and ethics blur. Police members who torture suspects in order to garner information may *believe* they are performing a necessary evil.<sup>17</sup> In 2009 alone, members of SAPS organised crime units have

been arrested for torture and murder, as well as for involvement in drug smuggling.<sup>18</sup> There is also some evidence that torture may not be uncommon in these units.<sup>19</sup> As organised crime members will make up a significant proportion of Hawks personnel, these matters should be flagged and monitored as leadership shapes the values of the new unit.

## LEADERSHIP IN CONTEXT

The Hawks were formed in the midst of, and will continue to be shaped by, political change. In late 2008 the ANC Chief Whip, Nathi Mthethwa, was appointed as Minister of Safety and Security (renamed Ministry of Police in April 2009). Various attempts to retain the Scorpions were made by civil society groups and opposition parties (and in one case a private individual). A national election was held, Jacob Zuma was elected as president of the country, the Scorpions were disbanded, and a new National Police Commissioner, Bheki Cele, was appointed to replace the former commissioner, who is on trial for corruption. President Zuma, Minister Mthethwa and Commissioner Cele have all expressed a desire to step up government's response to crime, at times using strong tones. How these attitudes and accompanying rhetoric will contribute to the moulding of the Hawks has yet to be seen, but should be watched.

In December 2008, four months before being sworn in as president, Jacob Zuma called for amendments to legislation that would allow for a more punitive response to crime:

I am convinced that within the parameters of the Constitution there is significant space for us to toughen legislation against all forms of criminality... Criminals must know that breaking the law will have severe consequences and that they'll suffer as a result of their actions... [We need] adequate and long sentences that fit the crimes that are committed.<sup>20</sup>

Minister Mthethwa was quoted in November 2008 as saying:



We don't believe that, when you are faced... with criminals armed with sophisticated weaponry, the police task would be to take out some human rights charter... We need to see how do you have a combination and a balance of human rights culture, but at the same time be effective as police.... [and] We are saying to the police... teach those people a lesson – fight fire with fire. There's no other way on that.<sup>21</sup>

On the day he was appointed national commissioner of police, Bheki Cele expressed his view that 'Cowboys never cry... We need to be tough. You can't be soft and you can't be moving around kissing crime. You need to be tough because you're dealing with tough guys.'<sup>22</sup> A week later he expressed his intention to ask parliament to review Section 49 of the Criminal Procedures Act relating to police use of lethal force. He said he did not want police to 'hesitate' before shooting.<sup>23</sup> Speaking of a hypothetical police encounter with an armed robber, Cele said 'Either [the criminal] acts correctly or we bury him...we must relook [at] how to allow police to do their work. We are not encouraging rookies or cowboys but we are not handcuffing police to die alone.'<sup>24</sup>

Speaking at the launch of the Hawks the unit's head, Anwa Dramat, formerly an ANC underground operative and Western Cape deputy police commissioner, reportedly told the audience he had been given a mandate to 'crush organised crime without mercy'.<sup>25</sup>

These excerpts reveal a pattern in the discourse of the new leadership, one that coincides with the establishment of the country's new elite police unit. There are high expectations of the Hawks, and they must be managed responsibly if they are to retain their integrity. The risk exists that managers could place unrealistic expectations on members, or members could put unrealistic pressure on themselves, which could result in corner-cutting integrity violations. Through research in corporations Clinard found that top managers sometimes pushed their subordinates so hard that the only way to meet their expectations was through illegal practices. He concluded that in some organisations members were socialised into

participating in corporate lawbreaking.<sup>26</sup> Though not empirically proven, evidence of similar trends emerged within the SAPS in mid-2009 when it was revealed that some police stations were manipulating crime statistics. Such manipulation has been partially blamed on the former commissioner's overemphasis on crime trends as a measure of performance, and his alleged public humiliation of managers who could not contain the rise in crime in their precincts.<sup>27</sup>

There exists then a risk of what Goodpaster calls 'goal sickness' for the Hawks – inconsistencies between organisational goals, means and values, and this rhetoric.<sup>28</sup> Similarly, the vision of the unit (as shaped by its leadership) must not fall outside the values and norms of society at large. Its actions and goals should transcend personal and organisational goals and foremost be legitimate within the societal context.<sup>29</sup> According to Worden:

Integrity [conforms] strategic planning to the principles in the vision. Integrity rids the vision of principles and values that are too far removed from the survival needs of the organisation, owing to the nullification of hypocrisy in integrity... Integrity demands that one's principles are in one's plans and actions.<sup>30</sup>

## CONCLUSION

Against what was at first significant public and political resistance, the Scorpions, renowned for their integrity and effectiveness, were disbanded in the first half of 2009. The location of the Scorpions' successor, the Hawks, within the South African Police Service has been met with widespread criticism, primarily due to fears over the autonomy of the new unit. The Democratic Alliance called the move an 'excessive centralisation of power'.<sup>31</sup> Fears also stemmed from public perceptions that the SAPS, unlike the Scorpions, suffered widespread corruption.

In a country where perceptions of rampant crime and moral degeneration abound, the Scorpions represented hope for many citizens. It will be an important victory for the Hawks and the SAPS as

a whole if the new unit can establish a similar reputation for itself. The SAPS Amendment Act provides an important legal foundation upon which the unit's architects and leaders can build a unit centred on integrity. But the form the unit eventually takes will depend on the vision and integrity of its leadership; their ability to mould a single culture based on sound ethical values; as well as on the successful achievement of the tasks put to them and the delivery of expectations. The management of integrity within a unit like the Hawks needs to form part of an overall strategic plan. Members of the Hawks are being drawn from a number of specialised SAPS units, including Organised Crime, some of which have themselves been exposed for involvement in criminal acts. It is important that SAPS members accepted into the Hawks share the same core values, and that these values mirror those laid out in the SAPS Codes of Conduct and Ethics.

The country has a new president, a new minister of police, a new police chief and a new elite unit with what appears to be the legislation and resources at its disposal to develop into something impressive. If successful, the Hawks may serve to motivate and raise morale throughout the organisation as members on the ground claim affiliation with the unit, and possibly strive to join it. The legislation is in place, the baton has been passed and members are being screened. It now remains for leadership to realise their vision for a new elite crime-fighting unit, founded on integrity, in which all South Africans can vest their hope.



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## NOTES

- 1 SAPA, Ex-Scorpions boss warns Hawks, *News24.com*, 6 July 2009, [http://www.news24.com/Content/South Africa/Politics/1057/665b5da7cc9c473eae6a6d38298f8159/06-07-2009%2010-07/Ex-Scorpions\\_boss\\_warns\\_Hawks](http://www.news24.com/Content/South Africa/Politics/1057/665b5da7cc9c473eae6a6d38298f8159/06-07-2009%2010-07/Ex-Scorpions_boss_warns_Hawks) (accessed 13 August 2009).
- 2 S Evans, Hawks take flight to pounce on criminals, *The Times* online, 7 July 2009, <http://www.thetimes.co.za/News/Article.aspx?id=1029833> (accessed 13 August 2009).
- 3 Members of this group broke away from the ANC in November and December 2008 and formed the

- Congress of the People (COPE), which went on to contest the 2009 general elections. One of the issues the party campaigned for was the reconstitution of the Scorpions.
- 4 Importantly the SAPS used the same justification of duplication of task when it closed the Anti-Corruption Units in 2001/02, stating that Organised Crime fulfilled this function.
- 5 N Mthethwa, Why the Scorpions are still apartheid's child, *Independent Online*, 24 April 2009, [http://www.iol.co.za/index.php?set\\_id=1&click\\_id=13&art\\_id=vn20080424060205149C642276](http://www.iol.co.za/index.php?set_id=1&click_id=13&art_id=vn20080424060205149C642276) (accessed 3 August 2009).
- 6 J Williams, Why I let Zuma go – Mpshe, *Independent Online*, 6 April 2009, [http://www.iol.co.za/index.php?art\\_id=iol1239011043453Z536&set\\_id=1&click\\_id=13&sf=](http://www.iol.co.za/index.php?art_id=iol1239011043453Z536&set_id=1&click_id=13&sf=) (accessed 4 August 2009).
- 7 This discourse is evident in the numerous stories of police corruption and abuse carried in the country's media on a daily basis, and the perceptions of mistrust in police, which these often generate. Very negative measurements of trust in police were illustrated in a 2006 Afrobarometer survey. A 2007 ISS Victim Survey suggested improvements in perceptions of police effectiveness since 2003 but still reflected significant perceptions of mistrust, corruption, and cooperation with criminals by police. A forthcoming paper based on research by this author suggests that perceptions of widespread corruption within the SAPS are held by most members of the organisation.
- 8 An 'integrity test' generally refers to a form of entrapment in which members are unknowingly placed in situations specifically constructed and monitored to gauge the integrity of their actions.
- 9 A Minnaar, The Scorpions Lose their Sting: Challenges to incorporation of the DSO into the SAPS, *South African Crime Quarterly*, 24 (June 2008), 23-28.
- 10 A Sinclair, Approaches to Organisational Culture and Ethics, *Journal of Business Ethics*, 12 (1) (1993), 63-73.
- 11 K Lasthuizen, *Leading to Integrity: Empirical Research into the Effects of Leadership on Ethics and Integrity*, PhD dissertation, Amsterdam: VU University, 2008.
- 12 L Huberts, M Kaptein & K Lasthuizen, A study of the impact of three leadership styles on integrity violations committed by police officers, *An International Journal of Police Strategies and Management*, 30 (4), 587-687.
- 13 K Parry & S Procter-Thomson, Perceived Integrity of Transformational Leaders in Organisational Settings, *Journal of Business Ethics*, 35 (2) (2002), 75-96.
- 14 The concept of managers 'defining reality' is taken from DuPree 1989, Nanus 2002 and Morgan 1986 cited in S Worden, The role of Integrity as a Mediator in Strategic Leadership: A Recipe for Reputational Capital, *Journal of Business Ethics*, 46 (1) (2003), 31-44.
- 15 W L Richter & F Burke (eds.), *Combating corruption, encouraging ethics: a practical guide to management ethics, 2nd edition*, New York: Rowman & Littlefields Publishers, Inc., 2007.
- 16 *Towards an integrated national integrity framework: consolidating the fight against corruption: report on the third national anti-corruption summit*, National Anti-Corruption Forum: Pretoria, 2008.
- 17 As illustrated by the 'softening up' or torture of inmates at the US prison, Abu Ghraib, since the 2001 attacks on the World Trade Center in New York.

- 18 P Joubert, Cops in torture death probe, *Mail & Guardian Online*, 6 April 2009, <http://www.mg.co.za/article/2009-04-06-cops-in-torture-death-probe> (accessed 3 August 2009), and A Eliseev & B Ngqiyaza, Drug probe nets top cop. *Independent Online*, 24 March 2009, [http://www.iol.co.za/index.php?art\\_id=vn20090324061348444C400604&set\\_id=1&click\\_id=13&sf=](http://www.iol.co.za/index.php?art_id=vn20090324061348444C400604&set_id=1&click_id=13&sf=) (accessed 6 August 2009).
- 19 This statement is based on interviews with four former organised crime and intelligence unit members who claimed to have employed the use of torture in recent years.
- 20 AFP, Zuma urges tougher crime laws, *News24.com*, 29 December 2008, [http://www.news24.com/Content/SouthAfrica/Politics/1057/3d70e7517b6a4cb8883c13c563480aff/Zuma\\_urges\\_tougher\\_crime\\_laws](http://www.news24.com/Content/SouthAfrica/Politics/1057/3d70e7517b6a4cb8883c13c563480aff/Zuma_urges_tougher_crime_laws) (accessed 3 August 2009).
- 21 Ibid.
- 22 R Bubeat, Look Who's Talking..., *iAfrica.com News*, 31 July 2009, <http://news.iafrica.com/features/1834640.htm> (accessed 3rd August 2009).
- 23 Before the post-apartheid amendment police could shoot liberally, including at fleeing suspects. The amendment restricts police to shooting only if shot at first, or in order to protect their, or another's life.
- 24 Sapa, Cele adamant on giving cops more fire power, *Independent Online*, 6 August 2009, [http://www.iol.co.za/index.php?from=rss\\_News&set\\_id=1&click\\_id=79&art\\_id=nw20090805161808462C704052](http://www.iol.co.za/index.php?from=rss_News&set_id=1&click_id=79&art_id=nw20090805161808462C704052) (accessed 6 August 2009).
- 25 A Basson, 'Dramat: We'll crush organised crime', *The Mail & Guardian Online*, 9 June 2009, <http://www.mg.co.za/article/2009-06-09-dramat-well-crush-organised-crime> (accessed 28 July 2009).
- 26 Clinard 1983 & 1988 cited in A Sinclair, Approaches to Organisational Culture and Ethics, *Journal of Business Ethics*, 12 (1) (1993), 63-73.
- 27 Although this theory has not been empirically proven, a somewhat hidden discourse around the 'Selebi-gate'/statistic manipulation exists. During fieldwork in April 2009 the former commissioner of a Gauteng station explained to the author that he was forced to manipulate statistics in order to avoid public humiliation. Also see: S Alcock, Crime stats scam exposed, *Mail & Guardian Online*, 5 July 2009, <http://www.mg.co.za/article/2009-07-05-crime-stats-scam-exposed> (accessed 14 August 2009) and S Alcock, 'Fear made police cook stats', 11 July 2009, *Mail & Guardian Online*, <http://www.mg.co.za/article/2009-07-11-fear-made-police-cook-stats> (accessed 14 August 2009).
- 28 Goodpaster 1997 cited in P C Young, Ethics and Risk Management: Building a Framework, *Risk Management*, 6 (3) (2004), 23-34.
- 29 S Worden, The Role of Integrity as a Mediator in Strategic Leadership, 31-44.
- 30 Ibid.
- 31 Creamer Media Report, DA Statement by Dianne Kohler-Barnard, Democratic Alliance shadow minister of police on the appointment of the new head of the DPCI, 21 May 2009, <http://www.polity.org.za/article/da-statement-by-dianne-kohler-barnard-democratic-alliance-shadow-minister-of-police-on-the-appointment-of-the-new->

head-of-the-dpci-21052009-2009-05-21 (accessed 13 July 2009).