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Draft Paper on Safety and Security
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Prepared by:
Dr Chandré Gould
Senior Research Fellow: Governance, Crime and Justice Division
Institute for Security Studies
cgould@issafrica.org
1. Introduction

The Institute for Security Studies welcomes the opportunity to provide comment on the Draft White Paper on Safety and Security (hereafter referred to as ‘the White Paper’). We acknowledge the significance of the distinction made between policies regarding policing and policies to improve safety and prevent violence. This is critical, since the criminal justice system in general, and the police in particular have an important role to play in responding to crime and violence when it happens, and bringing the perpetrators to justice. However, the police and criminal justice system alone cannot prevent violence before it happens. This is strongly acknowledged by the White Paper.

Through this submission we seek to offer constructive comment on the White Paper aimed at ensuring the realization of the goals of the paper, to:

• Provide an overarching policy for safety and security that will be articulated in a clear legislative and administrative framework to facilitate synergy and alignment of policies on safety and security; and
• Facilitate the creation of a sustainable and well-resourced implementation and oversight mechanism, which will co-ordinate, monitor and evaluate and report on implementation of crime prevention priorities across all sectors.1

We welcome the fact that overall authority and responsibility for implementation of the White Paper is to be located within the Presidency, and specifically the Department of Planning, Monitoring and Evaluation. We also welcome, and support the proposal for the establishment of a National Crime and Violence Prevention Centre. In addition, the focus on early intervention that is woven through the document is welcome. In general, we believe that this White Paper is an important step towards preventing violence in the long term.

This submission is supported and endorsed by:

• Dr Mokhantso Makoae, African Research Fellow Human Sciences Research Council
• Associate Professor Emeritus, Andrew Dawes, Department of Psychology, University of Cape Town
• Elizabeth Dartnall, Sexual Violence Research Initiative, South African Medical Research Council
• Associate Professor Catherine Ward, Psychology Department, University of Cape Town
• Professor Mark Tomlinson, Department of Psychology, University of Cape Town
• Professor Clifford Shearing, Director, Global Risk Governance Programme within the Law Faculty’s Institute for Humanities in Africa (HUMA)
Professor Rachel Jewkes, Director: MRC Gender & Health Research Unit and Honorary Professor, School of Public Health, University of the Witwatersrand

2. Overall approach of the White Paper

The White Paper recognises the necessity for an effective criminal justice system to respond to crime, and the need for a longer term, developmental approach to building safer communities. It builds on the vision articulated in the National Development Plan for Building Safer Communities and stresses the importance of reducing the risk factors for violence.

In its introduction, the White Paper also clearly states the need to facilitate “new legislative and administrative arrangements to operationalize” the policy. We support this approach, since it acknowledges the importance of aligning the objectives and outcomes of different sectors and departments. This is necessary, if a co-ordinated approach to reducing violence is to be achieved. In this respect the introduction to the White Paper refers explicitly to the need to involve government departments in the social and economic clusters.

The final section of the White Paper is quite specific in naming six themes for an integrated approach:

- An effective criminal justice system
- Early intervention to prevent crime and violence
- Victim support
- Effective and integrated service delivery
- Safety through environmental design, and
- Active public and community safety

In this regard the White Paper makes an important contribution towards moving us closer to practical solutions. It is our recommendation, however, that the Departments that would lead, or take responsibility for, the implementation of programmes relating to each of these pillars be identified and that the White Paper defines a clear mechanism for achieving inter-departmental planning, co-operation and coherent, shared outcomes and outcome measures, that is referred to in Section 6.6. We would also like to draw attention to pillar 2 that emphasizes early intervention and note that while early intervention is important, we believe the focus should be on primary prevention.

3. Detailed comments

3.1 Comments on Section 4: Understanding safety, crime and violence prevention

In Section 4: ‘Understanding Safety, Crime and Violence Prevention’, the White Paper offers a clear and cogent analysis of the underlying causes of violence and crime in South Africa, drawing extensively on the public health discourse.

It foregrounds the World Health Organisation’s model for understanding the interaction between risk factors at different levels, and throughout the life course and, significantly, acknowledges that these factors come into play from the moment of conception. The White Paper identifies that factors such as ‘low (or non-existent) family and parenting bonds; exposure to and victimization by violence’, and ‘low educational attachment’, may all contribute to perpetuating violence. In this respect the White Paper follows closely the national and international literature that informs the violence prevention discourse.
On pages eight and nine of the White Paper a table presents the range of risk factors at individual, relationship, community and structural levels, and stresses the importance of increasing the resilience of individuals, families and communities to violence. The White Paper also recognizes and clearly states the need for interventions at all levels: primary, secondary and tertiary. However, there were significant omissions from the list of risk factors that we would like to recommend are added in the next draft, and some risk factors that should be removed because they are not supported by the evidence. We recommend the following amendments:

**Individual risk factors**

- Should include early onset conduct problems – particularly aggressive behaviour (prior to age five). If not addressed there is the long-term risk of life course persistent aggressive conduct.
- In the adolescent period, affiliation to antisocial peers – particularly involvement in youth gangs; also early school dropout associated with unemployment, are risk factors that should be referred to.
- Since there is no evidence that teen parenthood is a risk factor for crime and violence. We recommend that this be removed from the list as a risk factor.
- In addition we recommend that high risk sexual behaviour be removed from the individual level risk factors in the model, as this is an indicator of emphasised masculinity rather than a risk in its own right.

**Relationship factors**

- Should include references to high levels of family conflict (not just violence) which are associated with ongoing stress experienced by the child
- Gender inequities and dominance and control over women should be included in the relationship level of the risk factor model and should be explicitly discussed as key factors, which need to be addressed in crime prevention.
- Alcohol and or substance abuse in the home should be added to this list of risk factors.
- Criminality in the home, also should be added to the list of risk factors.
- A key issue is exposure to “toxic stress” in which a combination of negative family factors come together, particularly in the early years.

**Community**

- One of the most ubiquitous risk factors at community level in some areas of South Africa, is the presence of organized crime associated with gangs involved in drug distribution, and crime that supports drug habits. This should be included as a risk factor.
- Poor policing in at risk communities and police corruption are also risk factors that should be referred to.
- Firearms should also be included as a risk factor at community level.
- Finally, we recommend that living in informal settlements should replace ‘migration’ and ‘rapid urbanisation’ in the social level of the model.
Section 4.2 deals with the complexity of the relationship between poverty inequality and crime. We support the approach taken in this section of the paper and its conclusion, again, that a developmental approach to violence prevention is necessary.

Section 4.4 highlights the importance of addressing the practical safety needs of vulnerable groups, identified here as persons with disabilities, the elderly, youth, women and children as well as members of the LGBTI community. In short, it identifies as vulnerable all members of society except adult men. In our view this is not helpful. While the practical safety needs of different sectors of society will differ (e.g. the need for young people to have safe spaces within which to interact socially; or the need for Early Childhood Development Centres to be located close to public transport routes to reduce the distance caregivers need to walk when they drop off or collect their infants), it is important also to acknowledge that the SAPS and Mortuary Surveillance Survey statistics and analyses make it clear that young men are more likely to be victimized than any other group. They are also more likely to be the perpetrators of violence. In addition, the data show that teenage boys from age 12 living in urban poverty are more vulnerable to violent victimization than any other social group mentioned in the White Paper. This has important implications for interventions, since in addition to preventive interventions in the early years, it is essential that preventive strategies also aim at early adolescence (improving school connectedness; quality of teaching; school safety etc.) and, thus reference to the vulnerability of this group should be noted in the White Paper. This is not to deny the vulnerability of those with disabilities and of LGBTI orientation. However, given the reality of pervasive violence it seems disingenuous to specify vulnerable groups in the way it has been done in the White Paper. At this stage it would be our contention that it is necessary for a holistic approach to be taken to violence and crime prevention, that does not favour some groups over others; while at the same time we are supportive of specific interventions being developed to address the needs of specific and different needs of different groups within society.

In addition, we are concerned that the White Paper seems to slip between a focus on perpetration and victimization, so that ‘risk and resilience’ is becomes focused solely on risk of perpetration, and ‘vulnerable groups’ focused on vulnerability to victimization. The White Paper needs to be more specific about the risks for perpetration and the risks for victimization, and should include a discussion about groups vulnerable to perpetration.

Section 4.5 refers to Human Trafficking. It is our view that this section of the report is not only factually incorrect, but it is unclear why this particular crime is singled out for attention in its own section of the White Paper, when other crimes, such as domestic violence, rape, assault are not. The evidence suggests that human trafficking, while affecting extremely adversely a small population of victims, is not as prevalent as these other crimes, nor is there any evidence that this particular crime has a broader social impact. It is our recommendation that it should thus not be elevated above other gender based crimes and should be removed from the final draft.

It is our view that the White Paper needs to acknowledge exposure to violence in schools (high rates of teacher violence and learner on learner, bullying and sexual assault) and the recent trends of cyber bullying and sexting. While sources and prevention of victimization must be addressed, the White Paper must emphasize that in South Africa children and youth are exposed to a pervasive regime of socialization into violence – at home, school, community and in the media. We recommend that reference to this is included in Section 4 of the White Paper.
Section 4.5 of the White Paper presents the recent police statistics for a range of offences. While an acknowledgement of the sustained high rate of crime and violence is important in motivating for policy to address safety and security, it seems inappropriate for a policy document to present such time-bound data.

Had the White Paper built on the data presented in this section, and used it in conjunction with the analysis offered earlier of the risk factors, to identify interventions that are necessary to address each of these different types of crime and violence, then its inclusion would be rational. As it stands in the current draft, this section does little more than make known what is already known about crime, without taking us any closer to a policy solution.

That being said, what this section of the White Paper does highlight very clearly, is the shortcomings of the crime statistics as presented by the SAPS annually, in particular that the statistics made public by the SAPS are insufficiently disaggregated. In addition, there remains inconsistency in the way in which the statistics are reported. In particular, when providing stats on reported crime against children the SAPS does not disaggregate within the 0-18 age band. Gender and age disaggregation from precinct level up is essential. We propose that for all categories of inter-personal violent crime statistics must be disaggregated by gender and by the following age categories: <18yrs, <12, and 12-17. This would provide a much clearer picture of the age and gender patterns that can then be linked to interventions.

The White Paper correctly identifies data as important to developing appropriate responses to crime and violence, we would thus urge the Secretariat to include in the White Paper reference to the responsibility of SAPS to make available to the public detailed, disaggregated statistics on a more regular basis than is currently the case.

3.2 Comments on Section 5: Policy architecture impacting on the White Paper on Safety and Security

Section 5 the White Paper sets out the ‘policy architecture’ impacting on safety and security. It refers to the:

- Constitution
- National Development Plan
- National Security Strategy
- Integrated Social Crime Prevention Strategy
- White Paper on Families (Department of Social Development)
- Integrated Criminal Justice System
- Community Safety Forums policy
- National Crime Prevention Strategy
- 1998 White Paper on Safety and Security, and
- Victim Charter

It omits reference to the following laws and policies, which we regard to be essential elements of the policy framework:

- The Department of Social Development’s Draft National Strategic Plan for Prevention and Early Intervention (2013 – 2017) that identifies early intervention as being “focused or ‘indicated’ interventions that target high-risk individuals or families identified as having signs or symptoms of social problems eg. a child who is
frequently absent from school, or whose caregiver is often intoxicated."6 This strategy is intended to provide the basis for the Department of Social Development to transform its services to children so as to significantly increase prevention and early intervention services and thus reduce the number of cases requiring statutory intervention. The strategic plan refers to the need to engage in evidence-based planning.

- The South African Integrated Programme of Action on Violence Against Women and Children (2013-2018) is also relevant, as – among other things – it seeks to “provide support to strengthen and capacitake families especially in relation to parenting responsibilities; to decrease the vulnerability of children to abuse, neglect and exploitation” and very specifically to “develop, strengthen and roll-out positive parenting courses”.7

- The Integrated Urban Development Framework, that foregrounds safety in relation to urban development.8


- National Family Policy – which defines to a vulnerable family as "a family who is socially isolated, subjected to the least empowering circumstances, who is without support systems and or adult supervision, not linked to resource, does not function due to various challenges and who exposes their family members to circumstances that are detrimental to their development" (Department of Social Development, 2006: 63). Children at most at risk for victimization are those who find themselves in vulnerable homes. Among the indicators of vulnerability are substance abuse, domestic violence, and involvement in crime.

- Department of Basic Education School Safety Framework, is also relevant and should be included.9

- Education White Paper 5 on Early Childhood Development 200110

- Children’s Act

- Elderly Abuse Act

- Domestic Violence Act
3.3 Comments on Section 6: An integrated approach to safety and security

As stated previously, the need for new institutional arrangements to enable intra-departmental planning and the setting of shared outcome objectives, are important. This is referred to in section 6.6 of the White Paper. However, the failure to give substance to the nature of the institutional arrangements is a shortcoming.

Our most serious concern, in relation to Section 6 is the devolution of responsibility for championing local implementation of crime and violence prevention to the Community Safety Forums and Community Policing Forums. It is our contention that since these forums are neither functioning effectively in many locations; nor do the participants have the necessary capacity or knowledge in relation to anything other than situational crime prevention, we fear that locating responsibility here will necessarily result in a focus on criminal justice and situational crime prevention, rather than on early intervention and prevention.

We share a similar concern in relation to the National Centre for Crime and Violence Prevention. We see the establishment of an institution of this nature as a necessary and important component of a long-term violence prevention strategy. It is necessary to recognize that a number of primary prevention programmes have been developed and tested in South Africa and evidence for their effect established. We would thus see the Centre as having a significant role to play, in co-operation with the relevant departments, in developing plans to take these programmes to scale, and would strongly call for the Centre to have as its core function the promotion of evidence-based practice, and the provision of support for the roll-out of evidence-based primary prevention programmes. For this, it will be essential that the Centre has strong links to the Departments of Health, Basic Education, and Social Development. We are, thus, concerned that the ability of the Centre to play this role may be hampered by only having institutional links to the Civilian Secretariat of Police and community safety forums. Again, this may result in a focus on situational crime prevention, and on the criminal justice system, rather than on primary prevention.

4. Conclusion

The White Paper on Safety and Security is an important document that creates the policy basis for an intervention framework to prevent violence in the long term. We are entirely supportive of the development of a detailed policy and implementation framework whereby the risk factors for violence can be addressed at all levels, from individual, to family, to community, and through statute. In order to achieve a reduction in violence, a long-term developmental approach is needed, just addressing early childhood is not enough. We have to address risk factors throughout the lifespan. There are now a number of evidence-based programmes that have been developed and tested in South Africa have and have been found to be effective in preventing violence or addressing the risk factors for violence. We hope that the White Paper on Safety and Security will provide the policy basis for the National Centre for Violence prevention to work collaboratively with Treasury, the Departments of Health, Social Development and Basic Education and with experts in civil society to scale these programmes up nationally.
Notes

2 Ibid., 5.
5 This strategy is still in the draft form.
6 DSD Draft Strategic Plan for Prevention and Early Intervention for discussion, 2013, 2.
9 Department of Basic Education, see http://www.education.gov.za/Programmes/SafetyinSchools/tabid/625/Default.aspx
10 See http://www.education.gov.za/LinkClick.aspx?fileticket=4dPdpYszrVQ%3D&
11 Please see the special edition of SACQ on violence prevention in which evidence-based programmes are discussed in detail: http://www.issafrica.org/publications/south-african-crime-quarterly/south-african-crime-quarterly-51