

EHP SA Case Study Series:
Included! How change happened for key populations and HIV prevention

‘Out of sight’

Addressing sexual violence in South African prisons



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1. INTRODUCTION

This case study examines advocacy for government to develop and approve policy to address and prevent sexual violence in South African prisons.

Sexual violence in prisons – a human rights violation classified as torture by the UN Rapporteur on Torture – is a widespread and systemic problem in South Africa, as well as being massively underreported. Sexual violence is a driver of HIV infection behind bars. The comparatively high HIV prevalence in correctional centres is due in part to the heightened vulnerability of the communities from which most prisoners come.

The overcrowding, poor sanitation, poor nutrition and inadequate medical care in South African prisons create environments conducive to HIV transmission and its rapid progression. Sexual violence and HIV must thus be addressed together.

Although sexual violence and HIV persist against a backdrop of highly retributive public attitudes and penal policies, they are not lost causes. Work in South Africa and elsewhere demonstrates that consistent, well-designed programmes and strategic advocacy can produce promising and positive results.

This case study focusses on the development and adoption by the South African Department of Correctional Services (DCS) of a comprehensive policy to address sexual abuse of inmates in DCS facilities ('the Policy').¹

About this paper

This paper is part of the series, *Included! How change happened for key populations and HIV prevention*, commissioned by EHPSA to the Nordic Consulting Group. The full series of nine case studies and discussion paper will be made available on the EHPSA website as they are completed, at <http://www.ehpsa.org/critical-reviews/included>

This case study was drawn from a paper commissioned to Sonke Gender Justice and source material supplied by Justice Detention International.²

Another case study in this series – *Pollsmoor: Reducing overcrowding in a South African remand facility* – provides deeper analysis of a situation that arose because of overcrowding in one remand facility and the underlying reasons for overcrowding.

About EHPSA

Evidence for HIV Prevention in eastern and southern Africa (EHPSA) is a catalytic intervention, contributing to national, regional and global processes on HIV prevention for adolescents, men who have sex with men (MSM) and people in prisons, through generating evidence of what works and why, and developing strategies to inform policymaking processes. It is a five-year programme funded by DFID and managed by MottMacDonald.

1 Department of Correctional Services, 2011. Policy to address sexual abuse of inmates in DCS facilities.

2 Just Detention International, 2018. *The Birth of a Movement to End Prisoner Rape in South Africa* (Forthcoming – to be available at <https://southafrica.justdetention.org/> or <https://justdetention.org/>).

2. CONTEXT

South African prisons

South Africa has 247 prisons that house approximately 160 000 people.

The majority of facilities were built during apartheid and have a range of cell types. Inmates are typically packed into overcrowded facilities, where they endure horrific conditions. Cells designed to hold 40 inmates have been found to hold up to 100 and often lacked adequate ventilation. Cells usually have only one open toilet; most toilets did not flush.

In March 2016, the system was at 136% capacity. Although overcrowding is a systemic problem, it is not uniformly felt across facilities. The average national staff-to-inmate ratio is 1:4. However, this ratio assumes that there is an even distribution of staff and inmates across all prisons; the reality is that one prison may have a staff-to-inmate ratio of 1:30,³ and another, depending on the unit and day of the week, may have a ratio anywhere between 1:58 and 1:178.⁴

Many facilities are in a state of disrepair, with broken windows, peeling paint and intermittent electricity supply. In some prisons, conditions have deteriorated to the point where running water, both hot and cold, is seldom available.^{5 6}

Sexual violence in prisons

In most South African prisons, sexual abuse of remand detainees (detainees awaiting trial or sentencing) and sentenced inmates is a daily reality. Although there is a dearth of nationally representative statistics, the limited research available underscores the extent of the issue. For example, according to the 2007–2008 annual report of South Africa's prison oversight body, the Judicial Inspectorate for Correctional Services (JICS), 50% of inmates surveyed noted that sexual abuse happens 'sometimes', 'often' or 'very often'.⁷

In 2005 HIV prevalence in South African prisons was estimated at between 40% and 60% by the Institute for Security Studies and the Inspecting Judge of Correctional Services,⁸ much higher than the comparable national HIV prevalence for men aged 15–49 years, which was estimated at 13% in 2004.⁹

HIV and sexual abuse are closely linked. They are driven by structural factors such as short-staffing and overcrowding which dictate longer stays in 'lock-up'; long lock-up periods in cramped quarters increase frustration and the likelihood of violence, including sexual violence. In addition, when inmates are locked up most of the time they have less access to custodial staff and are more likely to be at the mercy of their cellmates. Staff have limited opportunity to observe interactions between inmates. This picture is exacerbated by the absence of critical policies, inadequate implementation of existing policies and limited training of officials on the ground to manage these conditions.¹⁰

The prison population in South Africa is also largely comprised of groups at high risk for HIV – men of colour aged 19 to 35 from disadvantaged socioeconomic backgrounds – which means many prisoners are living with HIV when they enter the prison system.

3 Dissel, A, 2016. *By the Grace of God: Staffing Correctional Facilities*. Cape Town, South Africa. Sonke Gender Justice. p 31.

4 Ibid, pp 47–48.

5 Ibid; Hopkins, R., 2015. How Pollsmoor prison can kill you. *Mail & Guardian*, Johannesburg, 23 December.

6 Although technically, remandees are also the responsibility of the South African Police Service and the Department of Social Development, DCS has been landed with managing this population.

7 It is important to note that this statistic is one of very few available. DCS only recently began collecting statistics of reported incidents because of pressure from civil society. As with sexual offences generally, it is likely that reporting is well below the actual rate of incidence.

8 Sonke Gender Justice Network and Just Detention International, 2012. *Addressing HIV and sexual violence in Department of Correctional Services facilities. A guide for working with members of the Department of Correctional Services*. Johannesburg. p 8.

9 Statistics South Africa, 2010. Statistical release P0302 Mid-year population estimates 2010. Pretoria. Table 4, p 6.

10 Gear, S, 2015. *In their Boots: Staff Perspectives on Violence Behind Bars in Johannesburg*. Just Detention International – South Africa. p 1.

Socio-legal context

South Africa has one of the most progressive constitutions in the world, with a comprehensive bill of rights that encompasses both civil and socioeconomic rights, including access to justice for everyone accused or convicted of a crime. The constitution recognises the right to dignity,¹¹ equality¹² and freedom from torture or other cruel or degrading punishment.¹³ It specifically guarantees the right of all detainees to conditions of detention consistent with human dignity.

As a signatory to the International Covenant on Civil and Political Rights (ICCPR), and the United Nations Convention Against Torture (UNCAT), South Africa has a duty to ensure the safety and wellbeing of prisoners.

However, because of high rates of violent crime, the South African sociopolitical context is hostile and unsympathetic to people in conflict with the law. 'Tough-on-crime' legislation and policies reflect the attitude of the public towards those accused or convicted of criminal offences. This retributive sentiment and approach extends to individuals in pre-trial detention, despite their right to be presumed innocent until proven guilty.

In their reluctance to introduce reforms legislators undergird these attitudes with their rhetoric; members of parliament have made assertions like: "Prison is like a five-star hotel".¹⁴ Prisoner rape is joked about and in one commercial series aired on national television it was used to scare would-be drunk drivers straight.¹⁵ In general, there is neither public sympathy for individuals caught within the criminal justice system, nor recognition that the disease, trauma and violence people experience in prison is directly connected to, or has an impact upon, the community outside.¹⁶

11 RSA (Republic of South Africa), 1996. Constitution of the Republic of South Africa. Section 10.

12 Ibid. Section 9.

13 Ibid. Section 12.

14 News 24, 2011. SA Officials: 5-star hotel for Dewani. Johannesburg. 5 May 2011 (accessed on 15 May 2017).

15 Brandhouse (2013). 'They'd love to meet you'. Drive Dry advertisement. https://adsoftheworld.com/media/print/brandhouse_drive_dry_lets_date_5 (accessed 15 May 2017)

16 For a recent example of public sentiment for accused persons: De Villiers, J (2017), 'Courtney Pieters was raped twice before being murdered, court hears'. News24, Johannesburg, 17 May (accessed 17 May 2017).

3. THE CHANGE PROCESS

Although the situation described here persists in most South African correctional facilities, since the turn of the millennium, advocates and champions within and beyond the prison system have been working to change it.

The rise of a movement: Pollsmoor, 2000

In 2000, three staff members at Pollsmoor Maximum Security Prison in Cape Town formed a group called Friends Against Abuse (FAA) to protect vulnerable prisoners against sexual violence. Vulnerable prisoners were defined as: first-timers; youthful and non-violent inmates; people with disabilities; and, people who identified as, or were assumed to be, gay or transgender.

The officers sought to instil at Pollsmoor a culture that valued personal dignity and human rights. Their work highlighted issues of sexual violence in Pollsmoor and in the South Africa prison system in general.

In 2004, Friends Against Abuse addressed the parliamentary correctional services portfolio committee – the first ever meeting on the topic of prisoner rape. The FAA had an opportunity to present its mission and make the case for government action. Their advocacy for change across the prison system attracted print media and television coverage but also fuelled tensions within DCS.

Evidence: 2002–2006

In 2002, the Centre for the Study of Violence and Reconciliation (CSVSR), a South African NGO, produced a seminal report on sexual violence behind bars and the integral role gangs played in perpetuating it. The study found that destructive masculine gender norms were largely to blame for the violence, which particularly targeted LGBT inmates. It also confirmed that sexual abuse was taking place in men's prisons and highlighted the negative impact on victims.¹⁷

In 2006, the results of a judge-led government commission on corruption, maladministration, violence and intimidation in the DCS was publicly released.¹⁸ The Jali report included an entire chapter on sexual violence in prisons and drew heavily on the CSVSR report. It drew attention to the vulnerability of certain groups of inmates, linked prison conditions, sexual violence and HIV transmission and explored the negative impact of the experiences of prison populations on the communities to which they return.

The report also underscored the failure of the DCS to respond effectively to reports of sexual violence and exposed the ineptitude and insensitivity of medical personnel within DCS when dealing with victims. It made a strong statement about the responsibility of DCS to protect inmates from abuse and recommended that staff be trained to deal with homophobia, rehabilitation of perpetrators and protection of victims. This official report received much coverage in the mass media and drew public and government attention to the perpetration of sexual violence against inmates.

Civil society advocacy: 2004–2006

During this period FAA began to extend its work to other prisons and sought support from Just Detention International (JDI), a US-based non-profit organisation founded in 1980 by prisoner rape survivors, with decades of experience fighting to end sexual abuse in detention.¹⁹

When FAA and JDI joined forces with local advocates, including CSVSR, they became an important alliance in the fight against sexual violence in South African prisons. Although JDI and CSVSR tried to initiate a partnership with DCS leadership to develop strategies to address sexual violence getting them on board was a slow and difficult process. In the same period, when CSVSR presented its research findings to the parliamentary portfolio committee on correctional services, it added to the picture FAA had started to share with parliamentarians.

17 Gear, S. and Ngubeni, K., 2002. *Daai ding: sex, sexual violence and coercion in men's prisons* [online]. Johannesburg: CSVSR.

18 Jali Commission, 2006. *Commission of inquiry into alleged incidents of corruption, maladministration, violence or intimidation into the Department of Correctional Services appointed by order of the President of the Republic of South Africa in terms of Proclamation 135 of 2001.*

19 At the time the organisation was known as Stop Prisoner Rape.

JDI's work in the US had shown that although the problem of prisoner rape could be blamed on many factors, it was above all the result of a toxic corrections culture. The group developed a training curriculum to challenge some of the views prison officials had about sex behind bars. They worked with FAA to deliver trainings to local facilities, especially in the Western Cape, where FAA was based.

Strengthening legal context: 2007–2008

The Criminal Law (Sexual Offences and Related Matters) Amendment Act, which was passed in 2007²⁰ defined rape as a gender-neutral crime, which had important implications for future policy on sexual violence in prisons. Prior to this, if the victim of sexual assault was a man, rape was prosecuted as 'indecent assault', a much lesser offence.

In 2008, the United Nations Special Rapporteur on Torture recognised that rape constitutes torture when it is carried out by, at the instigation of, or with the consent or acquiescence of public officials. This definition placed an additional obligation on countries who subscribe to the UNCAT to take positive measures to address and prevent sexual violence, including sexual violence in prisons.

Supportive DCS leadership: 2007– 2008

In 2007, a change in DCS leadership cracked open a window for advocates when Vernie Petersen was appointed to the position of National Commissioner. Petersen's background was different from most corrections officials; before his series of management roles at DCS, he had served at social justice NGO, NICRO, and was highly aware of and engaged in issues of sexual violence in prisons.

In June 2008, Commissioner Petersen organised a day-long workshop on prisoner rape. JDI and CSVr were invited to present papers and in his opening remarks, Petersen praised their work. During the seminar, Petersen spoke in blunt terms about sexual abuse in DCS prisons and the obligation of the state to provide safe and humane custody. This was a landmark moment; never in DCS's history had any high-ranking official, let alone the commissioner, been as candid about the department's failure to keep prisoners safe. Petersen even invited the press to the seminar, which ensured that his calls for greater accountability reached far and wide.

Commissioner Petersen invited JDI and CSVr to work with DCS, which opened more doors for pilot training programmes. However, by the second half of 2008, leadership in DCS was fracturing and Petersen was transferred to another national department.

Training and collaboration: 2006–2008

In 2006, with permission from DCS, JDI began training at four prisons in Western Cape and Gauteng provinces. Training included basic information on sexual abuse and covered broad concepts like consent, sexual orientation and gender identity. The training also included practical tips on how to identify sexual abuse survivors – and protect them from retaliation if they came forward to report abuses.

The team also ran workshops for independent, community-based monitors – known as Independent Prison Visitors (IPVs) – who fell under the Judicial Inspectorate for Correctional Services (JICS). In 2007, JICS invited JDI and CSVr to run a two-day training with its visitors' committee coordinators, who supervise the IPVs. JICS also worked with JDI on questions for an inmate survey, which led to new findings on prisoners' experiences of sexual abuse.²¹

Drafting policy: 2009–2010

Following the workshop on prisoner rape hosted by Commissioner Petersen in 2008, JDI and CSVr approached the commissioner to develop a nationwide policy at DCS that would tackle sexual abuse in its prisons. Petersen agreed that the policy should be developed jointly by a team of corrections officials and advocates, and a task team was appointed.

20 Republic of South Africa, 2007. *Criminal Law (Sexual Offences and Related Matters) Amendment Act*.

21 Judicial Inspectorate for Correctional Services. 2008. *Annual Report for the period 1 April 2007 to 31 March 2008*. Cape Town. p 33.

Heading the team was DCS's head of psychology; she and another long-standing security official became strong champions of the policy and played a crucial role securing buy-in from top DCS officials.

By September 2009, the task team had developed its draft rules and submitted them to the Department of Justice. Input and approval was sought from each DCS directorate and by the end of 2010 the policy had been submitted for formal approval.

Policy approval process: 2010–2013

Despite the success of the drafting process, and parliamentary submissions by JDI and CSVR on the need for the policy, the completed draft lingered in departmental limbo for more than two years. One of the reasons was that the DCS champions with whom JDI had worked had since left their positions and changes in leadership complicated communication regarding the policy. Meanwhile, CSVR had stopped working on its sexual violence in prisons programmes, which left JDI without an advocacy ally.

In 2011, JDI founded a local South African organisation – Just Detention International: South Africa (JDI-SA) – to strengthen the effort to move the policy forward. It also began a strategic partnership with non-governmental organisation, Sonke Gender Justice (Sonke), to collaborate on addressing sexual abuse in prisons and lobby specifically for adoption and implementation of the national policy.

Throughout 2011 and 2012, the partners worked to identify new contacts within the Department of Correctional Services, with whom they held a series of meetings to remind senior leadership about the drafting process and raise awareness of the completed policy. Sonke and JDI-SA continued to make written and verbal submissions to the parliamentary portfolio committee on correctional services to urge the adoption of the national policy. They also raised their concerns directly with the Minister of Correctional Services and the National Commissioner for Correctional Services. The organisations generated public conversation by granting interviews to journalists and publishing opinion pieces to stress the urgency and necessity of the policy.²²

In May 2013, the policy was finally approved. Even then, however, DCS did not announce its decision. In fact, activists only learnt in July that year that the policy had been approved nearly three months earlier. Still, it was a milestone achievement: at last, DCS had a policy, known officially as the Policy to Address Sexual Abuse of Inmates in DCS Facilities. Insiders indicated that what finally persuaded senior management and Minister Ndebele to sign was ongoing pressure from the portfolio committee.

Outcome

The policy was a powerful human rights document. Included in its many strong provisions it emphasised training for corrections officials on sexual abuse prevention, education for prisoners about their right to be safe, and safe housing for new arrivals, especially those most vulnerable to sexual violence. The guidelines also called for inmates to have multiple safe and free channels for reporting abuse, including direct channels to the head of the facility. According to the policy, if a prisoner is assaulted he is entitled to competent medical and mental health care.

The policy was ambitious. If carried out fully, it would require a substantial shift in the way South African prisons were being run. Implementation was where the real challenge lay.

In 2013, JDI-SA, in partnership with other NGOs, began a pilot to implement the policy at Leeuwkop Correctional Centre, which involved intensive staff training. In 2017, their persistence paid off when the DCS recognised the value and impact of their work and approved the roll-out of the policy in all six DCS regions. DCS requested JDI-SA to train its officials in another 18 facilities across different provinces. JDI-SA kicked off this training in July 2017; by the end of August 2018 it had reached 15 facilities and continues to roll out training across the country. Implementation has only just begun, and a long road lies ahead, but after years of work, the process is in motion.

22 Rawoot I, 2013. Sexual assault in jail is common and brutal. *Mail & Guardian*, Johannesburg. 28 March.

4. HOW CHANGE HAPPENED

4.1 Actors

Actors relevant to the development and adoption of the policy include research and advocacy organisations in civil society, individual correctional service officials, parliamentarians, government, oversight bodies, the media, and individuals who have been or are currently incarcerated. Summarised in the table below are the roles of these actors in drawing attention to sexual violence in prisons and the need for a policy to address it, developing the policy, and advocating for its adoption.

Actors	Key actions
Inmates	<ul style="list-style-type: none"> • Made use of accountability mechanisms • Participated in research surveys • Participated in lobbying efforts to have the policy adopted
Prison monitoring institutions: Judicial Inspectorate for Correctional Services (JICS), visiting judges, parliamentary committees	<ul style="list-style-type: none"> • Through monitoring, conducting inspections and reporting, enabled access to information regarding perpetration of sexual violence inside prisons • Drew attention to sexual violence in annual reports
Civil society (national and foreign NGOs and coalitions, including former inmates): JDI, CSV, Sonke Gender Justice	<ul style="list-style-type: none"> • Conducted research on incidence of sexual violence in prisons • Engaged continuously with Correctional Services and provided technical expertise and support in developing the policy • Publicised the issue • Lobbied executive, legislature, to adopt the policy
International and national media	Reported on sexual violence in prison and other issues associated with overcrowding.
Department of Correctional Services	<ul style="list-style-type: none"> • Individual officials championed issue of need for a policy to prevent sexual abuse of inmates • Engaged with civil society experts in development of a comprehensive policy • Ultimately adopted the policy
National Parliament	Applied pressure on DCS to adopt the draft policy through the Portfolio Committee.
International agencies, including the United Nations Committee Against Torture and Special Rapporteur on Torture	UN Special Rapporteur on Torture recognised that rape constitutes torture when it is carried out by, at the instigation, or with the consent of acquiescence of public officials.

4.2 Contributing factors

In identifying critical factors contributing to the achievements, a distinction can be made between those that created an enabling environment for change, on the one hand, and, on the other, the tactics used to bring about change in this context. Inevitably, there is some overlap.

Creating an enabling environment

- **Champions**

Champions within the DCS were central to the development of the sexual violence policy. The series of changes in Pollsmoor brought about by the early initiatives of Pollsmoor staff had broader relevance. During his short term of leadership, Commissioner Petersen's commitment to reform opened doors for training and kick-started the policy development process. The drafting of the policy and approval process was only possible because of the work of the DCS leadership on the task team. A few organisations and individuals within civil society also led the way with quality research, determination, skilful engagement in a difficult context, and persistence over more than a decade.

- **Catalytic event**

Most catalytic events take the form of crises that prompt reflection and acceptance of alternative approaches previously deemed inappropriate. In this case, the catalyst was Commissioner Petersen's time in office – a positive event. Commissioner Petersen opened doors across the national prison scene for initiating the policy development process. However, Petersen's tenure only lasted 17 months, which underlines the importance of identifying and responding to new opportunities quickly and in a way in which the progress made is not lost.

- **Quality evidence available**

Evidence provided by NGOs to DCS, parliament and the media was crucial in convincing the authorities of the existence of sexual abuse in prisons and maintaining pressure for action. Evidence from the government-appointed Jali Commission provided irrefutable national evidence, which the government could not dismiss as 'unrepresentative'. The Jali Commission drew heavily from NGO findings in respect of sexual violence, especially the 2002 CSVr report.²³

- **Research institutions expected to engage on findings**

The use of evidence was a critical aspect of civil society's approach to influence. Researchers in CSVr anticipated that their evidence would be used; indeed, it was critical for the Jali Commission. Later, civil society organisations commissioned further work to provide evidence and guidance.

- **Evidence-based practice in DCS**

Commissioner Petersen publicly confirmed his acceptance of the evidence of sexual violence in prisons and the need to act upon it. He set up a task team with external experts to provide evidence of good practice. DCS continued with the task team after Petersen's departure.

- **Context provided opportunities for CSOs to develop, CSOs had capacity to respond**

Starting with FAA and CSVr, civil society found space to engage with DCS directly and via the media. JDI brought additional resources and provided an institutional home when CSVr made a strategic decision to stop prison work. Sonke complemented JDI in its approach and funding.

- **External funding available**

Limited amounts of external funding sustained the capacity of civil society to engage in influencing and provide the services that gave them a presence within facilities.

Tactics

Civil society and committed leaders within DCS followed several astute approaches:

- **Collaborative approach**

JDI-SA and other partners adopted a collaborative approach, working quietly – and out of sight – on training and policy, which was important when dealing with an institution that had previously been defensive and closed to outsiders. This approach was different to Sonke's later, more strident, advocacy, which resulted in them losing access to DCS facilities for several months. The establishment of the task team – similar to the technical working groups established in other contexts – formalised the collaboration with DCS.

- **Pilots**

JDI-SA's approach of implementing small-scale training pilots within selected facilities was effective because it produced proof of concept and garnered greater support from DCS officials who could see the benefits first-hand.

- **Persistence**

Key players demonstrated sustained commitment. In particular, stakeholders from different spheres continued when the draft policy suffered from a hiatus in DCS before it was approved in 2013; one of the CSVr researchers of 2002 (who now works for JDI-SA) continues to provide leadership on the issues. Persistent civil society engagement – led by JDI-SA and Sonke – with the parliamentary portfolio committee, maintained pressure on DCS. It appears that this pressure, to which Sonke's more strident advocacy contributed, was critical to the eventual approval by Minister Ndebele.

23 Gear, S. and Ngubeni, K., 2002. *Daai ding: sex, sexual violence and coercion in men's prisons* [online]. Johannesburg: CSVr.

4.3 The role of civil society

Civil society actors played a central role in bringing about the sexual violence policy. Researchers providing evidence worked closely with advocates, indeed in some cases they were one and the same. Advocates worked tirelessly to get the policy drafted and during the long delays in the change process continued with pilot programmes. They also ensured that the policy remained visible once it was accepted, lobbied actively for implementation and provided technical support to assist implementation.

5. CONCLUSION

A policy that signified a step towards addressing and preventing sexual abuse of inmates in prison was finally adopted after years of research, establishing evidence, close consultation and collaboration between civil society and government actors, and lobbying by civil society. Although this is only an intermediate success – the ultimate success is an overall, actual, improved response to sexual violence in prison – this policy is vital to the overall objective.

From this case, we can draw the following key lessons:

- It is vital for advocacy efforts to build a strong evidence base upon which to draw when advocating for the development of laws and policies.
- Advocacy does not have to be adversarial; it can be as successful if it is cooperative and does not alienate government actors. Indeed, in this instance, members of the DCS reported that they were more inclined to work on the policy because of the friendly and collaborative stance of civil society actors.
- Civil society actors can effect change by employing complementary and multi-pronged approaches. In this case, JDI-SA and CSVN played a highly cooperative role, and provided their technical expertise around the content of the policy, but at the same time advocated with Parliament on the need for the policy. Sonke drew on its experience of working with inmates, lobbied Parliament and, when extra pressure was needed, used the media effectively.

It is certainly true that the adoption of the policy is an important, indeed crucial, step in the direction of preventing and responding adequately to sexual violence in prisons. However, policy alone is not a 'success', nor is it the ultimate goal. As the Jali Commission Report stated most aptly: 'The Department's well-designed policies relating to sexual abuse will remain meaningless pieces of paper unless such policies are properly communicated, implemented and adhered to.'²⁴

24 Jali Commission, 2006. *Commission of inquiry into alleged incidents of corruption, maladministration, violence or intimidation into the Department of Correctional Services appointed by order of the President of the Republic of South Africa in terms of Proclamation 135 of 2001*. Supra note 19, p 400.

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