



Building a Fit for Purpose South African Intelligence Service

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April 2021

Discussion paper 006/2021



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Summary

Political factionalism and governance dysfunctionality have seen intelligence flounder and fade in a democratic South Africa. However, even if intelligence is no silver bullet, it has a role to play in protecting South Africa's constitutional system, its external interests and national values. It could assume different forms, such as traditional reporting on domestic or foreign threats, but also warnings to government when it fails to meet legitimate expectations that could contribute to a climate conducive to protest and violence.

The reality is that recent years have seen a steady deepening of the relationship between politics and intelligence – one that has encroached upon the latter's essential independence. As a result, intelligence has done little to guide the state along a trajectory that seeks to avoid further corruption; dysfunctionality; and conflict. These ills will inevitably accumulate if the human security imperatives at the heart of the intelligence mandate are not addressed. Parallel needs to balance secrecy, democracy and politics, compound this very delicate equilibrium.

In this paper, we look at the requirements for a 'fit for purpose' intelligence capacity, placing the emphases on the 'what' (priorities), rather than the 'who' and even the 'how.' Our arguments for a 'lean and mean' service, maximising analytical skills rather than classic espionage, are based primarily on the inadequate resources available to the state, as well as on the nature of South Africa's domestic challenges and the country's limited international footprint.



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Does South Africa Have a ‘Fit for Purpose’ Intelligence Service?

“Unless someone has the wisdom of a sage, he cannot use spies; unless he is benevolent and righteous, he cannot employ spies; unless he is subtle and perspicacious, he cannot perceive the substance in intelligence reports. It is subtle, subtle!”

— Sun Tzu

In February 2018, the Daily_Maverick published an article, stating the following: “Mr Cyril Ramaphosa will inherit a number of headaches from Jacob Zuma, including extensive corruption affecting the state; an economy that is underperforming by almost every available measure; and political as well as policy divisions within the ruling party. His to-do-list will have to include the country’s intelligence service, the State Security Agency (SSA). Not only has it become highly politicized during Zuma’s reign, but it has also declined in performance and, by implication, in usefulness. Should the Ramaphosa presidency still feel the need for such a capacity, it will have to cleanse the organisation and initiate a systematic refocusing exercise.”¹

In December 2018, the High-Level Review Panel into the SSA, appointed by President Ramaphosa, published its findings. The Panel’s report² identified the following problem areas:

- “Politicisation: The growing contagion of the civilian intelligence community by the factionalism in the African National Congress (ANC) progressively worsened from 2009.
- Doctrinal Shift: From about 2009, there was a marked doctrinal shift in the intelligence community away from the prescripts of the Constitution, the White Paper on Intelligence, and the human security philosophy towards a much narrower, state security orientation.
- Amalgamation: The amalgamation of National Intelligence Agency (NIA) and South African Secret Service (SASS) into the SSA did not achieve its purported objectives and was contrary to existing policy.
- Secrecy: There is a disproportionate application of secrecy in the SSA, stifling effective accountability.
- Resource Abuse: The SSA had become a ‘cash cow’ for many inside and outside the Agency.”

In her 2019/2020 Budget Vote, State Security Minister Ayanda Dlodlo said, “We have thus identified as high priority risk, the socio economic (sic) condition and the high unemployment of people and youth in particular, the cyber space security, regional influence, countering international terrorism, domestic political stability



and economic prosperity as our uppermost priorities. We will proceed to identify risks and opportunities at the earliest possible stage, shaping developments and preventing threats from emerging in the near future.”

In February 2021, the Constitutional Court handed down a judgment that South Africa’s foreign signals intelligence capability, the National Communications Centre (NCC), was operating unlawfully, as it was not established in terms of any law. (The NCC is housed in the SSA). The implication of this ruling – which also found other aspects of South Africa’s main communications surveillance law, Rica, unconstitutional – was that the SSA was expected to shut the NCC down with immediate effect.³

On 9 March 2021, the Sunday Times published the following: “ If the latest crime statistics issued by the ministry of police are anything to go by, it should be clear to most of us that a chaotic police and crime intelligence service cannot fulfil its mandate of adequately addressing the scourge in the country. The much-publicised debacle regarding the suspension of Lt-Gen Peter Jacobs, former head of Crime Intelligence, is the latest in a slew of events involving the SAPS and that unit ... And once again, seemingly at the heart of this latest controversy is corruption within the SAPS and the Crime Intelligence unit.”⁴

Former State Security Minister David Mahlobo, previously a Zuma loyalist, on 9 April 2021, said the SSA still suffered because it had been formed with people who did not see eye to eye. Mahlobo said some agents had worked for the apartheid regime while others had worked for liberation movements. He added that, for South Africa, intelligence prioritised threats, including violent protests; territorial integrity; and economic threats, like corruption. Mahlobo, however, added that anyone could be recruited to gather information: “They can even recruit a minister, a president or a judge or parliamentarian - as long as you know what kind of information and influence you need. Even today, there are countries and governments that have collapsed because of the work of intelligence foreign services.”⁵



It is easy to see how far the intelligence community has strayed from its initial mission if the following is considered: "... [the] intelligence community is to provide evaluated information with the following responsibilities in mind:

- The safeguarding of the Constitution;
- The upholding of the individual rights enunciated in the chapter on Fundamental Rights (the Bill of Rights) contained in the Constitution;
- The promotion of the interrelated elements of security, stability, cooperation and development, both within South Africa and in relation to Southern Africa; and
- The achievement of national prosperity, whilst making an active contribution to global peace and other globally defined priorities for the well-being of humankind.

If one adds to the above that the SSA and Crime Intelligence (SAPS) have experienced a revolving door of ministers and director generals/commanding officers for the past decade, it is almost impossible to come to any other conclusion than that South Africa's official intelligence capacity is not a national asset: rather, it seems to be the source of never-ending embarrassment; corruption; and political shenanigans.

"If we closed down state security, we'd save money and we won't be less safe"

— Professor Anton Harber⁶

Does South Africa Need a Functional, Effective Intelligence Service?

"Our adversaries - terrorists, foreign intelligence services, and criminals - take advantage of modern technology to hide their communications; recruit followers; and plan, conduct, and encourage espionage, cyber-attacks, or terrorism to disperse information on different methods to attack the U.S. homeland and to facilitate other illegal activities."

— Christopher A. Wray, FBI Director

The fact that the existing intelligence entities are failing in their constitutional responsibilities and duties does not imply that the country does not need such a national capacity. However, we need to go back one step. South Africa actually has a plethora of intelligence structures, some better known than others: the State Security Agency (SSA – domestic and foreign branches); Crime Intelligence (SAPS); Defence Intelligence (SANDF); Financial Intelligence Centre (FIC, SA Reserve Bank); National Intelligence Co-ordinating Committee (NICOC); National Communications Centre (NCC - responsible for integrating and co-ordinating all South African government signals and communications interception through the Signals Intelligence Evaluation Centre and the Office of Interception Centre); and the



Office for Interception Centre (OIC – it plays the lead role in the interception of communications for security and law-enforcement services).

This leads back to the core question - does South Africa need a functional, effective intelligence service (or services)? The answer is a somewhat conditional 'Yes.' It would be extremely naïve to suggest that the state does not require unique, accurate and timely intelligence on issues such as the conflict in Northern Mozambique; the activities and impact of organised crime, including money laundering; drug, arms and people trafficking; foreign espionage (including the theft of technology and business plans); the socio-political situation in Zimbabwe; or radical domestic groups that might be planning violent activities in South Africa.

According to a recent article⁷, "Successful states are able to navigate the complexities of geopolitics, the challenges and opportunities that pepper the strategic landscape and make sense of what is often an opaque and dynamic world. A nation's intelligence apparatus constitutes the apex of its efforts to make sense of a world in flux, inform strategic decision-making and warn of the perils around the corner or further afield. The idea that any state with our level of domestic complexity and fragility, continental engagement and international ambition can succeed without effective intelligence is not merely naïve, but dangerous."

This brings us to the critical issue of prioritization. It is easy for those in the state's bureaucracy to be pre-occupied with structures and the filling of vacancies - and even the High-Level Review Panel fell into this trap to a certain degree. However, before people are placed in departmental organigrams, the decision-makers should focus on the 'what', before they discuss the 'how and by whom'. A 'fit for purpose' intelligence structure or structures must have a clear mandate, in other words the clients of the intelligence product must, within the boundaries of available resources and capacity, dictate the short-, medium- and long-term tasks with which intelligence structures should keep themselves occupied. But even then, there is a definite proviso – these tasks must fit into the dictates of the constitution, the rule of law principle, the limitations of the legal framework, and the execution of the responsibilities must be transparent enough to enable effective oversight, notwithstanding the fact that intelligence work will almost always include an element of secrecy, including inimitable tradecraft.

However, there is a problem that goes beyond the remit of intelligence, namely that many national priorities are inherently vague.⁸ In the case of DIRCO's (the Department of International Relations and Cooperation) priorities, which should assist the foreign branch of the intelligence services to focus its own efforts, the principles of South Africa's foreign policy are defined as "a commitment to international peace and to internationally agreed-upon mechanisms for the



resolution of conflicts; a commitment to the interests of Africa in World Affairs; **and**. a commitment to economic development through regional and international cooperation in an interdependent world." One might add, tongue-in-cheek, that the ruling party, the ANC's foreign policy objectives are probably better defined, although clouded in party ideology and dogma, rather than true national objectives⁹.

The point is that Crime Intelligence (CI) should not struggle to articulate its priorities as its main client is SAPS, where CI is housed, and the same applies to Defence Intelligence and the South African National Defence Force (SANDF). However, when it comes to the civilian domestic and foreign intelligence branches, formulating priorities would require ongoing interaction with numerous actual and potential departmental clients. This is innately a senior management task, rather than the responsibility of desk officers. It also demands a feedback loop from the clients, where each intelligence report or presentation is rated in terms of uniqueness; relevance; accuracy; timeliness; and usefulness.

As is the case in most countries, the mandates of Defence Intelligence and CI probably need to be circumscribed, based on their respective departmental responsibilities. Once again close interdepartmental coordination will be required to ensure that any foreign operations by CI do not overlap with the work of the foreign branch of the civilian intelligence service. In the case of Defence Intelligence, the distinction will not so much be based on territorial or geographic criteria, but rather on the actual focus of collection and assessment activities, when compared with the operations of the foreign branch. However, it should be anticipated that interdepartmental jealousy and 'competition' could crop up - once again necessitating well-planned coordination and a mature approach to collaboration.

One might argue that 'new world order' issues, such as environmentalism; fair trade; human rights; and international labour practices, to name but a few, might be included in South Africa's intelligence priorities, as they do fit into the country's national value system, but the counter argument would focus on the finite resources that should be spent on intelligence work in light of the country's dire socio-economic conditions.

A more complex issue is 'business intelligence.' Many countries, including France, China and Russia, do use their intelligence structures to obtain business information that could benefit their 'own, national' companies or interests. This is sometimes referred to as the use of 'Friendly Spies', as the espionage is perpetrated by and in countries one might view as allies or friends. However, this raises numerous challenges, in addition to the 'moral' aspect, for instance the high relational risks involved in such activities, the dilemma of who exactly should



benefit from the stolen information, and in the case of South Africa, whether our limited intelligence resources should be directed to costly and intricate intelligence operations. We think the answer is no, because of the added risk of corruption flowing from such operations.

In conclusion. While the 1994 White Paper on Intelligence is to an extent dated and in need of fundamental review, it is not far off the mark when it defines intelligence as “the product resulting from the collection, evaluation, analysis, integration and interpretation of all available information, supportive of the policy and decision-making processes pertaining to the national goals of stability, security and development”. What we can see from this definition of intelligence, is a focusing of the priorities of the intelligence community on the “greater national agenda of stability, security and development.” In determining the priorities of a new intelligence architecture, this should be one of the key areas of debate: Should the national intelligence structures award attention and priority to issues pertaining to security only (narrowly defined security) or is there a role for the intelligence community to play in achieving the laudable goals of development and stability?¹⁰

One could probably argue that an official National Security Strategy (NSS) would assist greatly when determining intelligence priorities.¹¹ For instance, the High-Level Panel recommended “the urgent development of an NSS as an overriding basis for redefining and refining the concepts, values, policies, practices and architecture involved in South Africa’s approach to security. Such a strategy should be widely consulted with the public and Parliament before formal approval.”¹² This seems to be a sound proposal, although it has received little attention from government, including the security cluster of ministers.

Getting There

To establish a modern and professional intelligence architecture, which is a national asset, is no easy task and few countries have succeeded in doing so.

The reality is that even a country with a limited international footprint, such as South Africa, must operate in an increasingly complex world, with political, economic, social, technological and security aspects interacting in a dynamic and often difficult way to predict. As a result, intelligence has to be focused on both the short (real-time, tactical issues/threats) and the long term (trend changes and even futuristic predictions).

But if the main objectives are clearly formulated, and pursued by the political leadership and departmental management, it can be achieved. After all, the basics are relatively straightforward – intelligence services should warn and inform the



decision-makers, and the population in general, of risks and threats that could undermine future political stability, social cohesion, economic performance, international relations and influence, as well as state and human security.

Let us take a brief look at the practical requirements to achieve the above-mentioned ‘vision’:

Leadership

Modern organisations that outperform their peers are almost without exception under the leadership of extraordinary people. The top echelon of a fit-for-purpose intelligence service will, at a minimum, be required to grasp the challenges that characterise the modern world. Their qualifications will contribute to such awareness, and political links or ‘cadre deployment’ should not come into play. Although consisting of strong individuals, the leadership group will be team players with the ability to get along with colleagues in other departments, as well as with the chiefs of other international intelligence services. Some experience in the private sector will be a plus factor, as would be more than a basic understanding of information technology trends, project management and financial planning, as well as financial oversight/control.

The four key leadership roles: the need for clarity of purpose – “the what and why”; the need for prioritisation to ensure impact and the link to value; the empowerment of trusted subordinates by minimising constraints, maximising freedoms and incentivising innovation; and the need to ensure delivery by setting targets and holding people to account for delivery¹³.

— General Sir Nick Carter, UK’s Chief of the Defence Staff

Intelligence Officers

It is impossible to provide generalised requirements that would fit all employees, ranging from human resource practitioners to IT specialists. Our focus will therefore fall on the two critical human assets of an intelligence service – those who collect humint (human intelligence) and the analysts. (Note: Some services have experimented with an integration of these two roles, but with little success.)

Preference should be given to people with a solid academic background, including education, journalism, international relations, the economy and information technology. Multilingual skills will be equally important, with specific reference to indigenous languages, as well as the languages used in countries relevant in terms of the intelligence priorities. However, in-house training is often more important than academic background, and this should include not only tradecraft and analytical techniques; but also project management, including financial planning and control; interpersonal skills; and information technology.



More senior personnel should be exposed to cross-departmental training, for instance attending DIRCO's cadette courses and the SANDF's senior officer training. (This might be problematic for under-cover operatives, but there are ways to circumvent such challenges.) Where appropriate, foreign intelligence services should be used to assist with training, even within their countries. (Note: The Intelligence Academy, formerly known as the South African National Academy of Intelligence (SANAI), is responsible for training the members of the South African intelligence services and agencies. It falls under the purview of the SSA. The SAPS and SANDF mostly do their own training, including intelligence.)

Process, Products and Outcomes

The purposes of intelligence in a democratic South Africa are outlined in the White Paper:

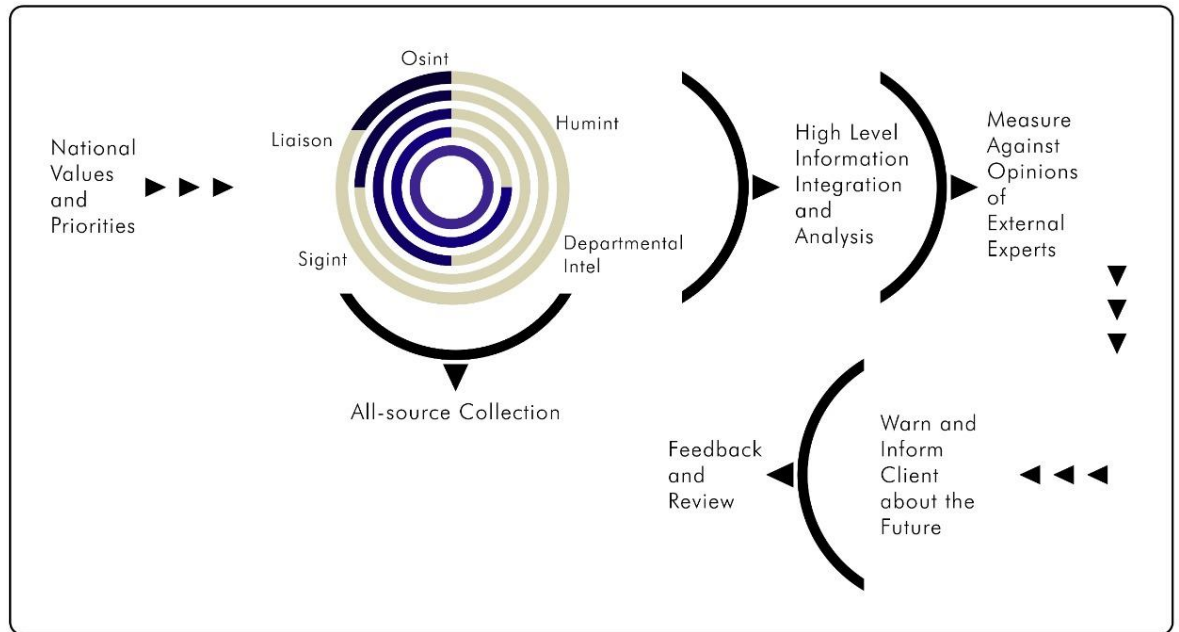
- To provide policy-makers timeous, critical and sometimes unique information to warn them of potential risks and dangers;
- To identify opportunities in the international environment, through assessing real or potential competitors' intentions and capabilities. This competition may involve the political, military, technological, scientific and economic spheres, particularly the field of trade; and
- To assist good governance, through providing honest, critical intelligence that highlights the weaknesses and errors of government

The noted shortcomings of the White Paper aside, these guidelines are still useful. We will concede that certain intelligence tasks require a strong covert or secrecy element, including the targeted interception of communication, for instance counter-terrorism, organised crime and counter-espionage (with both the state and private commercial activity as potential targets for foreign intelligence services or even public and private companies).

However, our preference is for intelligence to become a useful contributor to national decision-making because of the following:

- The all- or multi-source nature of the information used;
- The quality of analysis that goes into the final product; and
- The unique, future-oriented nature of the process and the end-product that reaches the client in a timely manner.





An example of this kind of approach to intelligence is the US Intelligence Community’s “survey” of where the world might end up in 2040. Its latest rendition warns of a political volatility and growing international competition or even conflict. The report entitled *A More Contested World is an attempt to look at key trends* and outlines a series of possible scenarios. The National Intelligence Council’s report does not make comfortable reading if you are a political leader or international diplomat.

In addition, there is a clear need to redesign all processes, from corporate services to operations. The emphasis should move away from the ‘silo approach’ to project-driven operations, aimed at specific outcomes, and with strict time frames and project budgets. This also implies fewer ‘managers’ and a sharp increase in relevant experts.

Clients

Category I clients are typically the president and his executive; the top management of departments; provincial and even municipal executives. Category II clients would include South African business executives and even civil society organisations, e.g. NGOs (for instance when an armed coup is likely in a specific country and South African citizens could come in harm’s way). Category III clients could include foreign intelligence services (‘liaison services’), based on the principle of ‘mutual sharing.’



Oversight

In light of the recent crises affecting the South African intelligence environment, and the concomitant failure of oversight, it is probably necessary to add a few notes on the issue of oversight. In our opinion, parliamentary and preferably civil society oversight need to be expanded and improved. The current system is ineffective and has contributed to the blatant politicisation of the SSA and intelligence in general, including crime intelligence, which is part of the SAPS mandate. Well-respected intelligence services, for instance Australian and Canadian, are much more transparent about their priorities and performance, and this helps to ensure more effective and even pre-emptive oversight. However, external oversight will never be sufficient; an intelligence environment free of scandal and inefficiency requires a senior management structure staffed by people with proven integrity and exceptional management skills, thus setting the example and acting ruthlessly when transgressions are demanded by the political leadership or practised by intelligence officers – both discreetly and overtly.

But in the case of South Africa, given all the recent exposés, there might be a case to be made for an additional Oversight Board. All operations that exceed a certain financial threshold, as well as especially domestic operations that might be deemed not in full compliance with the mandated and authorised priorities, would need the support of the Board. A possible composition is the following: the DG of the SSA; the Inspector General of Intelligence; the chairperson of Parliament's Joint Standing Committee for Intelligence; a senior judge (to be nominated by the Chief Justice); a senior representative of the Public Protector; a representative of Business Unity South Africa (BUSA); and a representative of the Press Council of South Africa. Note: All members will have to undergo security clearance.

Intelligence Monitoring and Political Parties

Another tricky subject is intelligence efforts aimed at legal political parties, including the ruling ANC. The only possible solution is to allow such information collection as long as there is clear justification based on the intelligence services' mandate and authorised priorities. The monitoring must therefore be procedural and legal, and not involve any kind of political bias or preference. And it should still be subject to the same levels of oversight as any other operation.

South Africa could probably take a leaf from the German state. In March 2021, Germany's Federal Office for the Protection of the Constitution (BfV) (the domestic intelligence agency) placed one of the country's main opposition parties, the Alternative for Germany (AfD) under surveillance. That designation gave state agents more powers of surveillance in certain circumstances, including potentially tapping the party's communications. A court in the city of Cologne recently



rejected an urgent motion by the AfD to stop the BfV from placing it under formal investigation. The party said any announcement that it was being investigated would undermine its right to fight the election on an equal footing to other political parties. In response, the BfV said it would not make any formal announcement on investigations into the AfD for the foreseeable future.

In an Era of Bulk Communication Interceptions

Jane Duncan recently wrote the following in the Daily Maverick¹⁴: “With the Constitutional Court judgment, Global South countries have reached a fork in the road on intelligence matters. Not many of these countries can afford to use bulk Sigint powers, given the expense and analytical capabilities needed. One alternative is for these countries to find common cause with one another and aspire to similar economies of scale to the Five Eyes¹⁵.

“The most obvious vehicle for establishing an alternative Five Eyes would be the BRICS alliance of countries. In any event, more southern African countries are pivoting to China and Russia on intelligence matters, not only in terms of surveillance capabilities, but intelligence doctrine, too. However, with the authoritarian nationalist governments in power in most BRICS countries, building an alternative Five Eyes would be a very bad idea, even if it was possible politically (a big if). It may be strategic to argue that the major imperialist powers have these powers, so if you can’t beat them, then join them, but it is not a principled argument.

“It is simply not in the true interests of the broader mass of South Africans, Africans, or the Global South as a whole, to continue supporting the use of bulk surveillance powers that reinforce their peripheral role in the world. This is a fight that Global South countries such as South Africa should not aspire to win on terms that the intelligence community sets. It’s an arms race to the bottom in which these countries will continue to be outgunned. The solution is not to try to buy bigger and better guns, but to champion disarmament.”

Comment: The SSA has since confirmed that it has done just that. Intelligence experts add that there is need for new legislation for SIGINT and OIC. They warn that the South African intelligence community has lost public support for almost all forms of communication monitoring/interception. As one person warns: “Non-functional SIGINT and OIC is a victory not only for criminals, but also corrupt senior officials.”



A Few Basic Steps/Guidelines

- ✓ Ensure that intelligence priorities are clear and based on national requirements. Review on a regular basis;
- ✓ Expose management and personnel to world-class training and coaching;
- ✓ Measure all projects and activities against the constitution and legal framework (rule of law);
- ✓ Review the existing legislative framework and bring it in line with international 'best practice';
- ✓ Oversight is not only about external structures; the intelligence services need to be managed by people with proven integrity and management skills, while the emphasis should shift to transparency rather than secrecy;
- ✓ Consider the drafting of a new White Paper on Intelligence, and ensure the participation of civil society;
- ✓ Keep the organisation 'lean and mean' – indications are that Corporate Services staff outnumber operational staff at the SSA;
- ✓ Embrace modern technology, including Artificial Intelligence (AI) and use it to improve trend analysis and predictive capacity;
- ✓ Deepen interdepartmental coordination and cooperation;
- ✓ Don't get preoccupied with 'spying' – it is only one component of the intelligence profession;
- ✓ Is the final product good enough for the president of the country – if not, review or dump it;
- ✓ Intelligence products should provide unique insights into and analysis of possible and probable future trends and events.



Conclusion

The core proposition of this paper is that South Africa should move away from a highly secretive (and over-staffed) intelligence design – one that encourages delinquency and tempts political interference – to an architecture that is focused on fewer priorities (and geographic responsibilities) where quality analysis, based on multi-source information, is used to add decision-making value to future-focused reports.

The reality is that South Africa does not have the national resources to build exceedingly expensive covert collection structures (or even a world-class capacity to intercept communications). But importantly, South Africa faces limited international threats, while its own continental and international stature, as well as influence, is unlikely to expand much in the next decade. The government's almost exclusive focus should therefore be the dire socio-economic conditions facing the vast majority of the population in South Africa and the region. To understand and manage these conditions should not require a large, expensive, inflexible, secretive 'spy network', but rather a small, world-class analytical capacity, making maximum use of new information technology, as well as of multi-source techniques.



Endnotes

- ¹ <https://www.dailymaverick.co.za/opinionista/2018-02-05-ramaphosa-will-need-to-tackle-the-state-security-agency/>
- ² https://www.gov.za/sites/default/files/gcis_document/201903/high-level-review-panel-state-security-agency.pdf
- ³ <https://www.dailymaverick.co.za/article/2021-04-07-data-collection-concourt-judgment-on-surveillance-has-far-reaching-global-implications/>
- ⁴ [https://www.timeslive.co.za/sunday-times-daily/opinion-and-analysis/2021-03-09-the-only-way-to-root-out-corruption-and-criminality-in-the-saps-is-to-start-at-the-top/;](https://www.timeslive.co.za/sunday-times-daily/opinion-and-analysis/2021-03-09-the-only-way-to-root-out-corruption-and-criminality-in-the-saps-is-to-start-at-the-top/)
<https://www.dailymaverick.co.za/article/2021-04-11-khehla-sitole-and-the-case-of-the-disappearing-national-security-threat/>
- ⁵ <https://ewn.co.za/2021/04/09/mahlobo-ssa-suffering-because-it-was-formed-by-people-with-different-interests>
- ⁶ <http://www.capetalk.co.za/articles/413659/state-security-illegally-spied-on-tito-mboweni-magda-wierzycka-and-others-critical-of-zuma>
- ⁷ <https://www.timeslive.co.za/sunday-times/opinion-and-analysis/2021-02-08-innovating-a-new-intelligence-architecture-a-prerequisite-for-building-the-developmental-state-in-a-world-of-uncertainty-and-fragility/>
- ⁸ Also see the National Development Plan's section on "positional South Africa in the World"
https://www.gov.za/sites/default/files/gcis_document/201409/ndp-2030-our-future-make-it-workr.pdf
- ⁹ <https://issafrica.org/amp/iss-today/back-to-the-future-for-anc-foreign-policy>
- ¹⁰ <https://www.rieas.gr/images/HOUTONSA.pdf>
- ¹¹ [https://repository.up.ac.za/bitstream/handle/2263/20766/Africa_Policy\(2012\).pdf?sequence=1](https://repository.up.ac.za/bitstream/handle/2263/20766/Africa_Policy(2012).pdf?sequence=1)
- ¹² https://www.gov.za/sites/default/files/gcis_document/201903/high-level-review-panel-state-security-agency.pdf
- ¹³ <https://www.dailymaverick.co.za/article/2021-04-08-south-africas-vaccine-roll-out-failings-expose-the-hollowing-out-of-the-state/>
- ¹⁴ <https://www.dailymaverick.co.za/article/2021-04-07-data-collection-concourt-judgment-on-surveillance-has-far-reaching-global-implications/>
- ¹⁵ The Five Eyes is an intelligence alliance, comprising Australia, Canada, New Zealand, the United Kingdom, and the United States. These countries are parties to a treaty for joint cooperation in signals intelligence.

