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MASTER'S DEGREE OF MANAGEMENT IN THE FIELD OF PUBLIC POLICY

PUBLIC PARTICIPATION IN SOCIO-ECONOMIC IMPACT ASSESSMENT FOR THE REVISED WHITE PAPER ON ARTS, CULTURE AND HERITAGE

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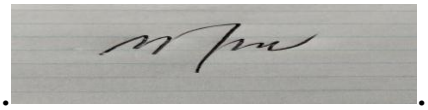
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Master's dissertation presented in partial fulfilment of the requirements for the Master of Management Degree in Public Policy at the University of Witwatersrand.

DECLARATION

I declare that this research is my own unaided work. It is submitted in partial fulfilment of the requirements of the degree of Master of Management (in the field of Public Policy) in the University of the Witwatersrand, Johannesburg. It has not been submitted before for any degree or examination in any other university.



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Mphikeleli Matthew Mnguni

24 November 2025

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To my late mother, Meriga Mbokane, whose spirit continues to walk beside me - thank you for your love, your sacrifices, and your unyielding belief in the power of education. This work is dedicated to your memory.

Above all, I am thankful for the community of thinkers, doers, and cultural workers who continue to imagine a more just, inclusive, and participatory future for our society. This thesis is both a reflection of your efforts and a contribution to the path you are already clearing.

ABSTRACT

This study critically examines the Socio-Economic Impact Assessment System (SEIAS) as a tool for participatory governance in the formulation of South Africa's 2020 Revised White Paper on Arts, Culture and Heritage. SEIAS was introduced by the South African government to ensure that policymaking is transparent, inclusive, and evidence-based (The Presidency, 2020).

The research was undertaken to assess whether SEIAS achieved its participatory objectives during the White Paper review process and to explore the experiences of cultural stakeholders who engaged in that process. It aimed to uncover whether SEIAS enhanced or hindered democratic cultural governance, and whether its application challenged or reinforced systemic exclusions within policymaking.

A qualitative research design was employed, involving semi-structured interviews, focus group discussions, and policy document analysis. The study was guided by a multi-theoretical framework drawing on Arnstein's (1969) Ladder of Participation, Gaventa's (2004) Power Cube, Habermas's (1984) theory of communicative action, Fraser's (1990, 2021) concept of participatory parity, Fricker's (2008) theory of epistemic injustice, and postcolonial critiques from Ndlovu-Gatsheni (2013) and Mbembe (2016).

The findings show that SEIAS, while formally participatory, often functioned as a technocratic and symbolic process. Rural, black, and community-based stakeholders were systematically marginalised through inaccessible language, urban-centric consultations, and a lack of feedback and accountability mechanisms (Cornwall, 2008; Gaventa, 2004). Participation occurred largely in what Gaventa (2006) calls "invited spaces," with limited opportunity to influence outcomes. Moreover, the oversight role of the Portfolio Committee focused on procedural compliance rather than democratic deliberation, reinforcing Fraser's (1990) notion of "weak publics."

The study concludes that SEIAS, as currently operationalised, is ill-equipped to address the democratic deficits within policymaking. For it to serve as a genuinely participatory mechanism, fundamental reforms are needed to dismantle institutional hierarchies, recognise diverse forms of cultural knowledge, and ensure equitable inclusion throughout the policy process.

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CHAPTER ONE: INTRODUCTION

1.1 Introduction

Public participation is widely recognized as a cornerstone of democratic governance and a critical component of effective policy formulation. In South Africa, this principle is not only constitutionally enshrined but also operationalized through instruments such as the Socio-Economic Impact Assessment System (SEIAS), which seeks to promote inclusivity, transparency, and accountability in the policymaking process. However, despite these frameworks, concerns remain about the actual quality and impact of public engagement, especially in the cultural policy sector. This study critically investigates the extent to which public participation in the development of the *Revised White Paper on Arts, Culture and Heritage* (hereafter referred to as the Revised White Paper), developed by the Department of Sport, Arts, and Culture (DSAC), was meaningful and influential. This policy development process offers a valuable case study for evaluating whether participatory mechanisms in South African cultural policymaking genuinely empower stakeholders or merely fulfil formal obligations.

South Africa's cultural policy landscape has long been marked by complexity, fragmentation, and persistent implementation challenges. Scholars have noted several systemic issues, including ineffective public engagement, ambiguity around terminologies that negatively affect stakeholders' ability to communicate and understand the policy framework, poor coordination among implementing bodies, and policy inefficiencies (Naidoo & Mare, 2015; Nawa, 2016; Sirayi, 2004; Umoh, 2022). While these challenges are well documented, existing studies have not adequately explored how they impact stakeholder participation in specific policy processes, such as the review and revision of the White Paper. This study addresses that gap by investigating whether participatory mechanisms within the Revised White Paper process facilitated meaningful stakeholder engagement or merely fulfilled procedural requirements.

The National Development Plan (NDP) accentuates the importance of improving policy effectiveness through greater coherence and reduced duplication (National Planning Commission, 2012). However, the success of such reform hinges significantly on the quality of public participation. Scholars argue that participatory processes must go beyond tokenism to enable genuine dialogue, co-decision-making, and shared ownership of policy outcomes (Abelson & Gauvin, 2006; Bailey, 2020; O'Faircheallaigh, 2010). Brooks (2017) reinforces this perspective, warning against symbolic engagement that satisfies statutory obligations without granting citizens real influence, a critique that resonates in the South African context where public consultations often lack responsiveness to stakeholder concerns.

Building on this scholarly discourse, the present study assesses whether the participatory processes employed in the development of the Revised White Paper empower stakeholders to shape cultural policy in meaningful ways. It interrogates whether these processes align with international best practices in participatory governance or reproduce the inefficiencies and superficial engagement that have historically undermined policy outcomes in the sector.

Within this context, SEIAS plays a central role. Designed as a forward-looking policy assessment tool, SEIAS is intended to evaluate the socio-economic impacts of proposed policies and regulations, including their implications for sustainable development, social equity, and economic growth (Mokone, 2022). Crucially, SEIAS mandates stakeholder participation throughout the policy cycle, using a range of methods - from informal engagements to structured consultations - to ensure that diverse, especially marginalized, voices are heard (The Presidency, 2020).

Research has shown that inclusive public participation not only strengthens the legitimacy of policies but also improves their overall effectiveness (Auriacombe & Sithomola, 2020; Buccus & Hicks, 2011; Bucema et al., 2023; Mabelebele, 2006; Piper & von Lieres, 2016; Tshoose, 2017). When effectively implemented, SEIAS can help departments identify potential policy risks, develop targeted mitigation strategies, and ensure that policies are responsive to the needs of vulnerable groups, thereby promoting equity and social justice (The Presidency, 2024).

In the light of such backdrop, this study explores the extent to which SEIAS, as applied in the process for the Revised White Paper on Arts, Culture and Heritage, facilitates meaningful public participation. It seeks to determine whether the process enabled genuine stakeholder influence over policy outcomes or functioned as a procedural formality. By situating this inquiry within broader debates on participatory governance and cultural policy reform, the study contributes to understanding how South Africa can strengthen democratic policymaking in the arts, culture and heritage sector.

1.2 Background

Since South Africa's democratic transition in 1994, policy-making has evolved significantly to address past injustices and establish a more inclusive society. In the early years, the government focused on legislative reforms and policy development to promote equity and social transformation (The Presidency, 2020). The Policy Coordination and Advisory Services (PCAS) played a key role in coordinating policy efforts until 2010, when it was replaced by the Department of Planning, Monitoring, and Evaluation (DPME) to enhance policy oversight and implementation (Langer et al., 2019).

One major initiative to improve policy effectiveness was the introduction of the Regulatory Impact Assessment (RIA) in 2007 under the Deputy President's leadership, with technical support from PCAS and the National Treasury. RIA aimed to assess the economic, social, and environmental implications of policies before implementation. However, it failed due to its narrow economic focus, inconsistent application, and lack of stakeholder engagement, leading to its discontinuation in 2009 (Adelle et al., 2014; DPME, 2015).

To address previous shortcomings, the DPME introduced the Socio-Economic Impact Assessment System (SEIAS) in 2015. SEIAS, now housed within the Policy and Research Services (PRS) unit of the Presidency, provides a structured approach to policy evaluation, requiring government departments to conduct Initial and Final Impact Assessments (The

Presidency, 2020) These assessments aim to enhance stakeholder engagement and ensure policies address the needs of diverse social groups (Xaba, 2020). SEIAS aligns with the National Policy Development Framework (2020), which standardizes policy management processes across departments to improve coordination and consistency in policymaking (The Presidency, 2020).

Despite these advancements, challenges remain. Public participation in policy development remains inadequate, with limited research on how stakeholder input influences policy decisions (Mokone, 2022). Additionally, policy coordination has often been hindered by fragmented efforts and bureaucratic inefficiencies (Buccus & Hicks, 2011). The lack of clear terminology and inconsistent use of foundational policy documents, such as green and white papers, further complicates the policymaking process (Umoh, 2022). While SEIAS aims to promote evidence-based policymaking, its effectiveness in practice is still underexplored (Xaba, 2020).

These challenges have been particularly evident in the revision of key policy frameworks, including the White Paper on Arts, Culture and Heritage. The original 1996 White Paper, developed shortly after the democratic transition, laid the foundation for transforming South Africa's cultural landscape from an exclusive, apartheid-era system into one that aimed to be inclusive, participatory, and rights-based (DACST, 1996). Recognizing the limitations of the 1996 policy in addressing evolving sectoral challenges, such as funding inequities, limited access, and uneven implementation, the Minister of Arts, Culture and Heritage appointed a nine-member Reference Panel on 4 November 2015 to oversee its revision (DSAC, n.d.). The Revised White Paper sought to build on the original's intentions while aligning with newer policy tools like SEIAS and responding to stakeholder critiques. After extensive consultations, it was approved by Cabinet in October 2018 and formally endorsed by Parliament in November 2019 (DSAC, n.d.).

This revision process reflects broader efforts to enhance policy coordination, stakeholder engagement, and evidence-based decision-making within South Africa's governance framework. However, it also underscores ongoing limitations in ensuring meaningful public participation and effective policy implementation - challenges that remain central to achieving the country's long-term development objectives outlined in Vision 2030 (The Presidency, 2020).

1.3 Problem statement

Public policy development in South Africa is constitutionally mandated to involve active public participation, ensuring that policies reflect citizens' needs and perspectives. Specifically, Section 195(1)(e & f)) of the Constitution requires that "public administration must be accountable" and that "people's needs must be responded to, and the public must be encouraged to participate in policy-making" (South Africa, 1996, p. 99). This participatory approach supports democratic governance by promoting transparency, accountability, and responsiveness, and is critical for addressing historical inequities and fostering social cohesion. Engaging diverse voices, particularly from marginalized groups, enhances the legitimacy and

relevance of policies, making them better suited to the needs of the community (Buccus & Hicks, 2011; Buscema et al., 2023; Mabelebele, 2006; Piper & von Lieres, 2016; Tsheola, 2014; Tshoose, 2017). In this context, SEIAS was introduced as a crucial tool for systematically evaluating the potential impacts of policies and legislation. By integrating public input into decision-making processes, SEIAS enhances evidence-based policymaking, ensures alignment with government priorities for sustainable development, and strengthens the effectiveness and inclusivity of policy interventions (Stewart, 2023; Xaba, 2020).

Despite the government's intention for SEIAS to drive meaningful policy reform, significant challenges remain in its implementation. One of the key concerns is the superficial nature of public participation, which often serves as a procedural requirement rather than a genuine effort to incorporate diverse stakeholder perspectives (Ferreira et al., 2022; Sebola, 2016; Sithole, 2020; Stewart, 2023; Umoh, 2022). For instance, Umoh (2022) suggests that, although SEIAS represents progress in policy development, it has not fully resolved inconsistencies in meaningful stakeholder engagement. Similarly, Stewart (2023) points out that while SEIAS is a valuable tool for evidence-based policy-making, its application remains largely confined to national-level policies, with limited application to sub-national governance. This narrow focus, coupled with a reluctance among some government officials to share decision-making power, raises doubts about the commitment to a genuinely participatory process (Sithole, 2020). According to van Staden (2017), this lack of deeper involvement results in stakeholders' contributions being considered only after policy decisions have been made, undermining opportunities for true collaboration in decision-making.

Beyond participation, SEIAS has been criticized for failing to adequately address issues of inequality and social justice. Ferreira et al. (2022) argue that the system does not fully uphold the constitutional mandate to advance equality due to the absence of clear guidelines on how data should be used to assess policy impacts on disadvantaged groups. Instead, as argued by Ferreira et al. (2022), SEIAS relies on aggregate rather than disaggregated data, which obscures disparities related to race, gender, and socio-economic status. As a result, the system’s capacity to address structural inequities is significantly weakened (Ferreira et al., 2022). To enhance its effectiveness, SEIAS requires substantial reform, including more inclusive stakeholder engagement, improved data disaggregation, and stronger mechanisms for assessing long-term policy impacts (Ferreira et al., 2022). In this regard, frameworks such as the Social Justice Impact Assessment Matrix (SIAM) have been suggested to integrate social justice considerations more effectively into policy evaluation (Ferreira et al., 2022).

Additionally, while SEIAS has a strong theoretical foundation, its real-world effectiveness remains largely unexamined due to a lack of empirical research. Much of the existing literature focuses on its conceptual framework (Juan et al., 2006; Lee et al., 2010), with limited studies evaluating its practical application. In particular, there is a notable gap in research assessing whether SEIAS effectively engages a diverse range of stakeholders and whether its mechanisms can overcome the challenges of inconsistent public participation and superficial consultation in practice. To address this, further research is needed to assess the processes put in place to facilitate public participation and their real-world effectiveness.

1.4 Purpose of the study

The purpose of this study is to critically assess the effectiveness of the SEIAS in facilitating public participation within the policy-making process, through a case study of the DSAC's 2020 Revised White Paper. While SEIAS is designed to integrate public input into policy development, concerns have been raised in the literature about potential challenges in its implementation, including superficial consultation, inconsistent stakeholder engagement, and limited accessibility for marginalized groups. This study seeks to examine how SEIAS functions in practice, investigating whether its participatory mechanisms genuinely enable diverse stakeholders to engage meaningfully in policy processes through inclusive, transparent, and accountable participation, or whether they risk operating as procedural formalities.

Ultimately, this study seeks to contribute to an understanding of participatory governance within SEIAS, highlighting both its strengths and limitations in fostering democratic engagement. By examining how the system operates within the context of DSAC's Revised White Paper process, the research will help identify gaps in the practical application of participatory methods and propose recommendations for enhancing SEIAS as a tool for more inclusive and effective policy-making.

1.5 Research questions

The overarching question that captures the essence of this project, to examine the integration of public participation in the policy-making process for arts, culture, and heritage, is:

1. *How did the SEIAS process incorporate and facilitate public participation in the development of the revised White Paper on Arts, Culture and Heritage?*

Research sub-questions:

1.1 How do the SEIAS framework and related process documents define and embed the role of public participation?
1.2 What are the experiences and perspectives of cultural stakeholders regarding their participation in SEIAS?
1.3 Do cultural stakeholders feel they had adequate opportunity to provide inputs and that these inputs shaped the content of the White Paper?
1.4 Are there barriers to the involvement of marginalized citizens and groups in SEIAS?

1.6 Objectives of the study

The primary objective of this study is to assess the effectiveness of the Socio-Economic Impact Assessment System (SEIAS) in facilitating meaningful public participation in the development of the 2020 Revised White Paper on Arts, Culture and Heritage. In support of this overarching aim, the study will pursue the following specific objectives:

1. To analyse how the SEIAS framework and related policy documents conceptualise and define public participation in the policy-making process.
2. To explore the experiences and perspectives of cultural stakeholders who participated in the SEIAS process during the development of the Revised White Paper.
3. To evaluate the extent to which stakeholders felt they had adequate opportunities to influence policy content through their participation in SEIAS.
4. To identify structural, institutional, or procedural barriers that may have limited the inclusion of marginalized voices in the SEIAS process.
5. To propose recommendations for strengthening SEIAS as a participatory policy tool that advances democratic engagement and social justice in cultural policy-making.

1.7 Contribution to the study

The study highlights five interconnected themes that are essential to rethinking public participation. First, it exposes the shortcomings of participation that is merely procedural, where citizens are involved in name but lack real influence. Second, it underscores the urgent need to redistribute power, so that participation is not just about being heard, but about shaping outcomes. Third, it emphasizes the value of inclusive engagement across multiple levels of governance, from local communities to national institutions. Fourth, it calls for recognizing and empowering subaltern counter-publics, those marginalized voices often excluded from mainstream policy spaces. Finally, it explores the transformative potential of co-governance, where citizens and the state share responsibility for decision-making.

Ultimately, the study argues that for public participation to deliver on its democratic promise, especially in societies scarred by historical injustice and ongoing inequality, it must move beyond symbolic inclusion. It must enable a shift from passive voice to active agency, ensuring that participation becomes a tool for real empowerment and systemic change.

1.8 Outline of the chapters

This chapter has provided an overview of the study, including the background, problem statement, objectives, and research questions. The study critically examines the extent to which the Socio-Economic Impact Assessment System (SEIAS) facilitates meaningful public participation in cultural policymaking.

The remainder of the chapters will be structured as follows:

Chapter 2: Literature review and theoretical framework: This chapter explores the relevant literature on public policy and its associated frameworks, including cultural policy, public participation, and the application of the Socio-Economic Impact Assessment System within policy formulation processes. It also establishes the theoretical framework underpinning the study, drawing on participatory governance theories (Cornwall & Gaventa, 2001; Gaventa, 2004; Arnstein, 1969; Fraser, 2021) and critical policy analysis tools (Birkland, 2019; Thomas,

1995; Ansell & Torfing, 2021), which guide the assessment of participation, power, inclusion, and institutional responsiveness in the SEIAS process.

Chapter 3: Research methodology: This chapter details the research methodology, with a particular emphasis on the qualitative approach employed, which is deemed most suitable for addressing the objectives of this study.

Chapter 4: Data presentation and analysis: This chapter focuses on the presentation and analysis of the collected data, highlighting key findings and their relevance to the research questions.

Chapter 5: Critical analysis of findings: This chapter presents the main findings of the study and offers recommendations based on the results, aiming to contribute to the enhancement of cultural policy within the public policy framework.

Chapter 6: Recommendations and conclusion: This chapter concludes the study by summarizing the key insights and reflecting on the implications of the findings. It also suggests avenues for future research.

CHAPTER TWO: LITERATURE REVIEW

2.1 Introduction

This chapter critically reviews theoretical and empirical literature on public policy, participatory governance, and cultural policy, with a particular focus on SEIAS as it relates to the Revised White Paper on Arts, Culture and Heritage. The review synthesizes competing frameworks and debates regarding how public participation is conceptualized, institutionalized, and evaluated within policymaking processes. It highlights the limitations of prevailing models, identifies gaps in the literature, especially with respect to the intersection of SEIAS and public policy, and positions this study's contribution within broader discourses on democratic governance and inclusion.

2.2 Public policy management

Public policy scholarship reflects a wide spectrum of definitional and analytical orientations. Classical definitions, such as Dye's (2013) formulation of policy as "whatever governments choose to do or not to do" (p. 3) underscore the breadth of governmental action, but offer limited analysis for evaluating participatory mechanisms. More refined approaches emphasize the institutional and normative dimensions of policy. Birkland (2017) defines public policy as a purposive course of action anchored in formal state decision-making, which enables a more structured appraisal of policy processes and institutional intent. Xaba (2020) extends this perspective by emphasizing the role of policy frameworks in facilitating or constraining accountability and public engagement.

Critical policy theorists complicate these rationalist models by foregrounding the role of power, discourse, and conflict. Hill (2014) argues that public policy must be understood as a product of political negotiation, where competing interests and ideologies shape both policy content and form. These perspectives are particularly salient in cultural policy contexts, where questions of identity, representation, and symbolic power intersect with institutional decision-making. Cairney et al. (2013) shift the analytical lens further by emphasizing outcome-oriented approaches, suggesting that the legitimacy of public policy should be assessed not only by its formulation but by its societal impact.

Cloete's (2018) integrative definition of public policy, as a normative, purposive intervention designed to address societal needs, offers a particularly relevant conceptual framework for analyzing cultural policy instruments such as the Revised White Paper. His approach bridges the gap between policy intent and implementation by emphasizing both the goals embedded in policy design and the broader socio-political contexts that shape their execution (Cloete, 2018). This dual focus provides an analytical basis for evaluating whether mechanisms like SEIAS facilitate substantive public engagement or perpetuate exclusionary practices, especially within a policy space concerned with transformation and equity.

Despite the breadth of public policy scholarship, there remains a significant gap in its application to the cultural sector, particularly in post-colonial contexts like South Africa, where policy is often tasked with addressing historical injustices. This study adopts Cloete's (2018) normative framework alongside Cairney's (2013) outcome-oriented perspective to interrogate how SEIAS functions within the policy process. Together, these frameworks enable a critical examination of how SEIAS navigates the tension between the ideals of participatory governance and the procedural logic of state-driven policy management in the formulation of the Revised White Paper.

2.3 Public policy cycles and participation

The policy cycle model remains a dominant heuristic in public policy analysis, enabling the identification of entry points for public engagement across stages such as agenda-setting, formulation, implementation, and evaluation (Jann & Wegrich, 2017). While its linear structure has been critiqued for oversimplifying the dynamic and iterative nature of policymaking (Howlett, 2019), the model continues to provide a valuable framework for analyzing where and how participation is institutionally embedded, or excluded.

The literature widely concurs that early stages of the cycle, particularly agenda-setting and policy formulation, offer the greatest potential for substantive public input (Fischer, 2009; Head, 2007). However, critical scholars such as Cornwall (2008) and Gaventa (2006) argue that institutional arrangements often limit these opportunities, producing forms of participation that are largely symbolic or technocratic. This is especially the case in contexts where state-centric frameworks dominate, sidelining community knowledge in favour of expert-led deliberation.

The South African SEIAS system is positioned as a policy tool designed to integrate stakeholder perspectives into socio-economic decision-making. Yet, empirical assessments of SEIAS reveal a paucity of scholarship that interrogates its participatory dimensions, particularly in cultural policy contexts. Existing literature focuses primarily on SEIAS's role in evidence-based policymaking (DPME, 2015) but fails to critically examine how it structures or constrains public engagement within policy cycles.

This conceptual silence is notable given the stated transformative aspirations of the Revised White Paper on Arts, Culture and Heritage. The White Paper purports to institutionalize participatory cultural governance, yet it remains unclear how SEIAS, as a gatekeeping instrument in policy formulation, mediates this objective. Moreover, the limited engagement with SEIAS in participatory governance literature potentially suggests an unresolved tension between its procedural function and its democratic potential.

By foregrounding the policy cycle and its intersections with participatory theory, this study contributes to an emerging critical literature that questions the adequacy of formal mechanisms for public engagement in policymaking. It challenges the assumption that institutionalized participation, through instruments like SEIAS, necessarily translates into democratic

legitimacy or inclusive policy outcomes. In doing so, it responds to calls for more nuanced, empirically grounded analyses of participation in policy development, particularly within sectors like arts and culture that have historically been shaped by exclusion and elite control.

2.3.1 Agenda setting

The agenda-setting stage is where societal problems are identified and prioritized. It determines which issues enter the policy discourse and are considered worthy of government attention. This process is shaped by various actors, such as political institutions, advocacy groups, and the media, and is influenced by power dynamics and institutional agendas (Birkland, 2017).

In the case of the Revised White Paper, public participation in SEIAS plays a decisive role in elevating the socio-economic challenges faced by the arts, culture, and heritage sector. Through consultations and stakeholder engagements, the SEIAS process surfaces these concerns and provides the evidence needed to justify their inclusion on the policy agenda.

Without public participation, critical socio-economic challenges within the arts, culture, and heritage sector may be overlooked, leading to policy gaps or misaligned priorities. As part of the agenda-setting stage, the Initial Impact Assessment (IIA) serves as a crucial mechanism for evaluating concerns raised during stakeholder engagements and consultations (DPME, 2015; The Presidency, 2020, 2024). By incorporating public feedback, the IIA helps determine whether these emerging issues warrant further policy development (The Presidency, 2020). In this way, public participation not only strengthens the assessment but also ensures that the policy agenda remains responsive, inclusive, and attuned to the sector's evolving needs.

2.3.2 Policy formulation

Flowing from agenda-setting, which incorporates IIA, policy formulation introduces Final Impact Assessment (FIA) as the next critical phase of public participation (DPME, 2015 2020, 2024). Policy formulation is the stage where policy options are crafted and evaluated, aiming to develop targeted proposals that address issues identified during agenda-setting. Public participation in this phase enhances the technical quality and democratic legitimacy of policy proposals by ensuring inclusivity and integrating diverse perspectives (Sidney, 2017).

The formulation process follows several structured steps (The Presidency, 2020). Initially, stakeholders identify various alternatives through brainstorming and consultations, exploring approaches that could effectively tackle the policy issue. These alternatives are then assessed against key criteria, such as feasibility, cost, effectiveness, and socio-economic impact, to determine the most viable policy solutions (Sidney, 2017).

Policy formulation is inherently multi-dimensional, involving interactions among political actors, institutions, and interest groups (Birkland, 2017; Sidney, 2017). Political parties advance policy agendas based on electoral commitments, while businesses and industries lobby for policies aligned with their interests (Birkland, 2019). Civil society organizations, including

grassroots movements and advocacy groups, push for policies promoting social justice, environmental sustainability, and cultural preservation (Buccus & Hicks, 2011). Additionally, public opinion influences policymakers, shaping proposals to reflect the preferences and priorities of constituents (Buccus, 2021). This intricate stakeholder engagement ensures that policy formulation remains both a technical and socio-political process.

For this study, the policy formulation stage is pivotal as it marks the FIA phase, where policy options for the Revised White Paper are thoroughly evaluated. This assessment determines the viability, socio-economic implications, and alignment of proposed solutions with sectoral development goals (The Presidency, 2020). Public participation remains essential, ensuring that policies reflect the lived experiences of individuals in the arts, culture, and heritage sector. By incorporating socio-economic impact assessments, conducted through consultations and stakeholder engagements, policymakers gain empirical evidence to inform strategic decisions (Ferreira et al., 2022; Stewart, 2023).

SEIAS further strengthens policy formulation by providing empirical evidence on the potential consequences of proposed policies. Through public consultations, surveys, and stakeholder engagements, policymakers assess the anticipated effects on employment, economic growth, and cultural sustainability (The Presidency, 2020). This participatory process enhances the reliability and inclusivity of findings, ensuring that the Revised White Paper responds effectively to sectoral challenges.

2.4 Cultural policy

Cultural policy, while grounded in the broader terrain of public policy, occupies a unique space in articulating values of identity, recognition, and social justice. Scholarship has consistently underscored the dual imperative of cultural policy to both preserve cultural heritage and promote contemporary creativity (Buscema et al., 2023; Dubois, 2011; Sirayi, 2004). In contexts of historical injustice, such as South Africa, cultural policy assumes an additional redistributive function, serving as a mechanism for redress and the reconstitution of democratic citizenship through cultural expression (Nawa, 2016; Nkondo, 2007). This intersection between cultural recognition and socio-political transformation necessitates policy instruments that are not merely technocratic but are grounded in participatory, inclusive, and dialogic governance.

Within this context, Cultural and Creative Industries (CCIs**)** have emerged as a strategic component of cultural policy. UNESCO (2009) defines CCIs as sectors whose principal purpose is the creation, production, and commercialization of goods and services that are cultural in nature. These include core sectors such as music, visual arts, performing arts, film, literature, and heritage, as well as creative industries like design, fashion, architecture, and digital content production (UNESCO, 2022; UNCTAD, 2010).

CCIs are situated at the intersection of cultural expression and economic activity. They are valued not only for their contribution to GDP and job creation but also for their ability to foster

social cohesion, promote cultural identity, and advance innovation (Throsby, 2010; Snowball et al., 2019). In South Africa, the emergence of CCIs has been closely linked to post-apartheid efforts to democratize culture, professionalize the arts sector, and create more inclusive economic opportunities. Mnguni (2024) argues that the development of South Africa's CCIs over the past 30 years reflects a deliberate attempt to transform a once-fragmented and marginalised cultural sector into a dynamic driver of national identity, economic growth, and social renewal.

Policies such as the 1998 Cultural Industries Growth Strategy (CIGS), the 2011 Mzansi Golden Economy (MGE), and the Revised White Paper reflect the state's commitment to integrating CCIs into national development strategies. These policies have sought to address historical inequities by expanding institutional support, enabling broader access to funding, and investing in creative infrastructure (Mnguni, 2024; DAC, 2020).

Recent literature has turned increased attention to the CCIs as both economic drivers and vehicles of identity formation (Snowball et al., 2019; Throsby, 2010). While CCIs are often celebrated for their potential to generate employment and foster innovation (UNESCO, 2022), critical scholars warn against a purely instrumentalist framing that reduces culture to market logics (Dubois, 2011; Franklin, 2016). This tension raises important questions about the kinds of values and voices that cultural policy privileges and whether participatory frameworks are capable of mitigating the risks of commodification, centralization, and exclusion.

Van Graan (2019) adds further depth to this critique by cautioning against the wholesale adoption of Global North models of CCIs within African contexts. He argues that cultural policy in Africa must not be reduced to a narrow focus on economic development through creative industries, especially given the fundamentally different structural conditions on the continent (van Graan, 2019). Instead, CCIs should be understood as only one component, rather than the central pillar, of a broader, context-sensitive arts, culture, and heritage policy. Van Graan's emphasis on integrating economic, social, and human development objectives within cultural policy resonates strongly with calls for participatory and locally grounded approaches (van Graan, 2019).

Although CCIs are frequently positioned at the nexus of economic development and cultural identity, their integration into national policy remains contested. Throsby (2001, 2010) argues for a cultural sustainability approach that blends market-based indicators with metrics of social well-being and symbolic value. Yet such integrative models depend heavily on governance frameworks that facilitate inclusive participation in decision-making processes. In this regard, the literature increasingly converges on the need for participatory cultural governance as a normative and practical imperative (Ansell & Torfing, 2021; Gaventa, 2004). However, the institutionalization of participation often falls short of its emancipatory potential, particularly when mechanisms are procedurally closed, poorly resourced, or dominated by elite interests (Cooke & Kothari, 2001; Cornwall, 2002).

Van Graan (2019) also critiques the lack of meaningful African agency in global cultural discourse, warning that the absence of African narratives in international media and cultural production risks reinforcing ideological dependency. The imbalance in cultural imports and exports, and the marginal position of the African content in global platforms, calls for deliberate investment in local creative ecosystems, not solely for economic benefit but for cultural affirmation and global representation (van Graan, 2019). In this view, the value of CCIs lies not only in job creation but in their capacity to project African epistemologies, values, and worldviews onto the global stage (van Graan, 2019)

This gap between the rhetoric and reality of participation is especially salient in the South African policy context. Despite constitutional commitments to public involvement, the implementation of inclusive policymaking remains uneven. Scholars such as Le Roux (2015) and Tsheola (2014) highlight the persistence of invited spaces in South African governance, where participation is framed as consultation rather than co-decision-making. Within the domain of cultural policy, this dynamic risks reinforcing the very marginalizations that such policy ostensibly seeks to dismantle.

The Revised White Paper (DAC, 2020) and its associated SEIAS process exemplify these tensions. While SEIAS is theoretically positioned as an instrument of evidence-based and participatory policymaking, its actual capacity to enable meaningful engagement remains under-examined in scholarly literature. Existing work tends to interpret policy tools like SEIAS through technocratic lens, with limited critical inquiry into their role in fostering participatory governance. Brooks (2017) for example, highlights how participatory processes in governance often become procedural exercises rather than substantive spaces for deliberation and inclusion. This study responds to this gap by interrogating the extent to which the SEIAS process facilitated substantive public participation in the development of the Revised White Paper, particularly from historically marginalized communities and stakeholders in the arts, culture, and heritage sectors.

Critical perspectives rooted in Freirean dialogue (Freire, 2020), Fraser's (2021) theory of multiple publics, and Gaventa’s (2004) typologies of power and participation offer important conceptual tools for analyzing this terrain. These frameworks challenge state-centric and technocratic models of policy engagement, calling instead for participatory arrangements that are pluralistic, power-aware, and structurally redistributive. In this regard, the literature underscores that participatory cultural policy must not only include diverse voices but must be designed to reallocate power, validate local knowledges, and institutionalize accountability mechanisms (Cornwall, 2002; Sirayi, 2004; Nawa, 2016).

The role of cultural institutions, such as libraries, museums, and community art centres, is also conceptualized in the literature as integral to participatory cultural ecosystems (Campbell, 1999; Hasitschka et al., 2005). These institutions function as mediating spaces where public engagement can be cultivated, but their transformative potential hinges on policy frameworks that recognize and support their dual role as both economic and cultural actors. However, where

policy fails to reflect bottom-up contributions, especially from rural, indigenous, and informal sectors, it risks reifying existing exclusions (Franklin, 2016; Parter & Skinner, 2020).

In short, cultural policy literature increasingly calls for a paradigm shift from instrumentalist and top-down models to frameworks rooted in participatory governance, cultural rights, and epistemic justice. This study situates itself within this critical tradition by examining whether the SEIAS process in the case of the Revised White Paper has fulfilled its democratic promise. In doing so, it contributes to broader debates on how cultural policy can become a site of co-governance, recognition, and participatory engagement.

2.5 Public participation in policy development

"Participation without redistribution of power is an empty and frustrating process for the powerless."
— Sherry Arnstein, 1969

Despite widespread rhetoric celebrating public participation as a cornerstone of democratic governance, its implementation too often falls short of its transformative potential. Instead of functioning as a vehicle for empowerment, participation is frequently reduced to ritualistic consultation, offering citizens voice without power (Cornwall, 2008; Gaventa, 2004). Public participation, defined by Arnstein (1969), is the redistribution of power that enables citizens to engage meaningfully in political and policy processes. The Organisation for Economic Co-operation and Development similarly describes it as the active involvement of citizens in decision-making, beyond mere information dissemination or consultation (OECD, 2001). Yet, both theory and practice reveal persistent disparities between the promise and reality of participatory governance.

In democratic contexts, especially those undergoing social transformation like post-apartheid South Africa, participation serves not only as a procedural norm but as a political right that strengthens citizenship, fosters accountability, and addresses structural inequalities (Gaventa, 2004; Nabatchi & Leighninger, 2015). The effectiveness of participation hinges on institutional willingness to share decision-making power and center marginalized voices, elements often missing in technocratic or tokenistic approaches (Buccus & Hicks, 2011; Fraser, 2021).

This study critiques dominant models of participation that privilege symbolic inclusion over substantive influence, drawing on a range of theoretical frameworks including Arnstein's (1969; 2019) Ladder of Participation, Gaventa's (2006) Power Cube, and Fraser's (2021) theory of counter-publics. It also examines participatory practices within South Africa's Revised White Paper and the SEIAS process, arguing that current frameworks risk entrenching exclusion under the guise of consultation.

2.5.1 Models of public participation

Public participation models serve as essential tools for understanding the multifaceted nature of engagement and its variable effectiveness across different contexts. One of the most influential instrument is Arnstein's (1969, 2019) Ladder of Citizen Participation, which conceptualizes participation as a spectrum of power-sharing, ranging from non-participation (manipulation and therapy), to degrees of tokenism (consultation and placation), and ultimately to genuine citizen power (delegated authority and full citizen control). While often presented as a democratic ideal, participation in practice frequently remains limited to consultative forms that fall short of redistributing power - a central concern highlighted by Arnstein's (2019) model.

While groundbreaking, this model is not without critique. Indeed, Arnstein (2019) herself acknowledged that the ladder was deliberately provocative, designed not as a definitive theory but as a heuristic device to stimulate debate about the realities of citizen engagement and the inequalities embedded in participatory processes. Subsequent scholars have expanded on these limitations. Critics such as Cornwall (2008), Fung (2006), Gaventa (2004, 2006) argue that the ladder's linear and hierarchical design oversimplifies the multidimensional nature of participation. Cornwall (2008) notes that participation is rarely a neat progression from one level to another; rather, it is often non-linear, context-specific, and shaped by both institutional arrangements and cultural norms. Fung (2006) criticizes the ladder's implied assumption that "more" participation is always better, emphasizing instead the need for adaptable models that reflect different goals, capacities, and political realities. Gaventa (2004, 2006) extends this critique by highlighting that the model focuses predominantly on visible forms of power, overlooking the hidden and invisible dynamics, such as agenda-setting and internalized norms, that often limit genuine citizen influence.

These critiques are particularly relevant to the present study, which examines the public participation mechanisms within the SEIAS process in the development of DSAC's Revised White Paper. While SEIAS is framed as a participatory device intended to democratize policy development, the critiques of Arnstein's (1919) model suggest that formal mechanisms alone do not guarantee meaningful engagement. The ladder's limitations caution against equating the presence of consultation with the redistribution of power, and invite a more nuanced analysis of how participatory practices are operationalized, whose voices are prioritized, and to what extent such processes transform decision-making (Arnstein, 1969, 2019).

To further this analysis, the study also draws on Thomas' (1995) Managerial Model of Participation, which shifts focus from citizens to public managers and emphasizes the conditions under which decision-makers are likely to share authority. While Arnstein's (1969) ladder interrogates the degree of citizen power and highlights how participatory mechanisms can mask tokenism and reinforce existing hierarchies, Thomas's (1995) model brings attention to the strategic considerations, risks, and incentives that influence managerial behaviour. Taken together, these frameworks provide a critical lens for assessing participation within the SEIAS process by enabling a dual examination: Arnstein's (1969) model questions whether citizen

engagement leads to a genuine redistribution of power, while Thomas's (1995) model illuminates the internal dynamics and constraints shaping the willingness of public officials to cede control.

2.5.2 Democratic governance and public participation

Public participation has long been upheld as a cornerstone of democratic governance, yet its meaning and practice are undergoing significant transformation in response to deepening political disillusionment and institutional fatigue. Scholars such as Mamdani (1996) argue that postcolonial states in Africa inherited bifurcated political systems that confined genuine participation and maintained authoritarian governance structures beneath the surface of formal democratic rituals. Similarly, Mbembe (2001) critiques the performative nature of postcolonial democracies, where electoral processes persist but fail to produce substantive inclusion, instead reinforcing spectacles of power and masking deeper exclusions. While elections remain central to representative democracy, they are increasingly seen as inadequate for ensuring responsive governance and meaningful citizen engagement. Ayers (2008, 2013) further warns that participatory frameworks are often co-opted by neoliberal governance models, reducing public involvement to technocratic procedures that legitimize existing power relations rather than democratize them. In this context, Gaventa (2004) argues that citizenship has been reduced to periodic electoral acts, weakening sustained engagement between citizens and the state, yet he also offers a pathway forward.

Rather than viewing representative and participatory democracy as mutually exclusive, Gaventa (2004) contends that meaningful participation can reinvigorate representative institutions, particularly at the local level where citizens are more directly connected to governance processes. This perspective urges a shift in how participation is conceptualized, not as an optional supplement to formal democratic structures, but as an essential mechanism for revitalizing democratic citizenship and addressing the democratic deficits exposed by disillusionment and exclusion (Gaventa, 2004).

This reconceptualization aligns with a broader critique advanced by Cornwall (2008) and Fung (2006), who argue that participation must be rooted in meaningful engagement that challenges power imbalances. Similarly, Lidskog and Elander (2007) point out that conventional forms of representative democracy often produce citizen passivity, obscuring the fact that sustained participation requires more than formal access; it demands a reconfiguration of power, knowledge, and decision-making authority.

Gaventa's (2004) insights further complicate the dichotomy between community-based participation and institutional political engagement. He contends that development discourse has traditionally emphasized participatory tools focused on local knowledge and community empowerment, while political science literature has prioritized advocacy, accountability, and formal political representation (Gaventa, 2004). Bridging these traditions, he calls for an integrated model of citizenship that incorporates both grassroots agency and institutional responsiveness (Gaventa, 2004). This dual approach challenges liberal models of citizenship

based solely on rights bestowed by the state, advocating instead for a vision in which citizenship is actively practiced through everyday engagement in social, cultural, and political life.

Despite the progressive commitments enshrined in the Constitution of South Africa, which guarantees every citizen the right to participate in governance (South Africa, 1996), the project of deepening democracy in the post-apartheid era remains urgent and contested. Inheriting a legacy of systemic exclusion, the democratic state has embraced participatory governance not merely as a procedural formality, but as a vehicle for redress, inclusion, and nation-building. This commitment is reflected in legislative instruments such as the Revised White Paper, which similarly emphasizes the inclusion of public voices, particularly those historically marginalized, as essential for promoting social justice and advancing cultural democracy (DSAC, 2020). Complementing this, national frameworks such as the NPDF and SEIAS underscore the centrality of public engagement in policy formulation and implementation. Both frameworks advocate for participatory mechanisms that are not only inclusive and transparent but also capable of shaping substantive policy outcomes (DPME, 2015; The Presidency, 2020, 2024). Together, these instruments highlight that policy increasingly recognizes the need to institutionalize public participation as a transformative and democratic practice, particularly within the arts, culture, and heritage sectors.

In this light, the calls by Buccus and Hicks (2011) to move beyond tokenistic consultations resonate with Gaventa's (2004) emphasis on participation as a right, one that enables citizens to claim other rights and transform their relationship with the state. Similarly, Nabatchi and Amsler (2014) argue that participation must be embedded not only in policy design but also in implementation, monitoring, and evaluation, reinforcing Gaventa's (2004) call for participatory governance that is multi-scalar and sustained throughout policy processes.

2.5.3 The limits of tokenistic consultation and the imperative of power distribution

While classic models like Arnstein's Ladder of Participation (1969, 2019) have long highlighted the spectrum between symbolic engagement and genuine power-sharing, recent scholarship has focused attention on how bureaucratic and technocratic governance often institutionalise tokenism under the guise of participation (Brooks, 2017; Piper & von Lieres, 2016; Tsheola, 2014; Tshoose, 2017). Far from being a design flaw, tokenistic consultation often performs a functional role in bureaucracies: it lends legitimacy, fulfils procedural requirements, and diffuses deeper demands for systemic change (Cornwall, 2008; Gaventa, 2004).

Participation in such contexts is typically confined to pre-structured spaces that limit who speaks and what can be said. Gaventa's (2004) Power Cube offers a useful framework for analysing how visible, hidden, and invisible forms of power shape participation - not just through formal mechanisms, but also through agenda control and ideological framing. When these dimensions are ignored, spaces like SEIAS consultations may simulate engagement while reinforcing existing hierarchies. Cornwall (2008) cautions that such performative participation

can obscure the politics of voice, presenting consultation as neutral even when it reflects elite interests and epistemologies.

South African scholars echo these concerns. Buccus and Hicks (2011) argue that public participation frequently takes the form of ritualised performance rather than democratic co-governance. Tsheola (2014) and Tshoose (2015) similarly note how institutional routines often reduce participation to a procedural checkbox, instrumentalised to validate predetermined outcomes.

Underlying these critiques is a shared recognition that genuine participation is impossible without some degree of power redistribution. As Thomas (1995) contends, public managers must move beyond merely inviting input to actively sharing control over decision-making. Without this shift, consultation is likely to be perceived as symbolic—reinforcing mistrust and disengagement. Participation must go beyond access and visibility to include real influence over outcomes, particularly for historically excluded communities.

Fraser's (2021) concept of counter-publics underscores the need to create spaces where alternative knowledges and epistemologies can be articulated and legitimised. This requires challenging dominant policy paradigms and rethinking whose knowledge counts. Nabatchi and Leighninger (2015) argue that sustainable, democratic policy depends on embedding participation across the entire policy cycle - design, implementation, monitoring, and evaluation.

In post-apartheid South Africa, the imperative of power redistribution carries particular weight given the legacy of exclusion and centralized control. Participatory governance, if it is to fulfil its democratic promise, must centre structural transformation - ensuring that participatory mechanisms are not only inclusive but also redistributive in practice. As this study explores in relation to the SEIAS process, the key challenge is not simply expanding participation, but reshaping it to dismantle entrenched hierarchies and produce policy outcomes that reflect diverse, often marginalised, voices.

2.5.5 The integration of marginalized voices

Inclusivity in public participation is not solely a matter of formal invitation but is deeply shaped by the distribution of voice, power, and recognition within participatory spaces. Fraser's (2021, 2024) theory of subaltern counter-publics challenges the liberal-democratic ideal of a single, unified public sphere, arguing that structurally marginalised groups, such as poor, racialised, or culturally dislocated communities, are routinely excluded from dominant arenas of discourse. These groups often form alternative spaces of expression in response to their exclusion, cultivating distinct epistemologies and cultural-political claims (Fraser, 2021). In the South African context, such counter-publics are evident among township-based artists, indigenous knowledge holders, and grassroots cultural actors who remain peripheral to official policy processes despite rhetorical commitments to transformation and inclusion (Drummond & Snowball, 2019; Hadisi & Snowball, 2017; Snowball et al., 2017).

While participatory mechanisms such as SEIAS may claim to promote stakeholder engagement, their design and implementation often fail to accommodate the differentiated realities and knowledge systems of marginalised communities. Public forums are frequently dominated by technocratic actors and framed in ways that privilege institutional rationalities over lived experience. As Fraser (2021) argues, participatory spaces should not suppress conflict or difference in the pursuit of consensus but should instead enable agonistic engagement where excluded voices can challenge dominant institutional logics. Similarly, Buccus and Hicks (2011) stress that participation must be sensitive to language, culture, and access if it is to function as a redistributive rather than legitimising mechanism.

Narayan et al. (2000), in the Voices of the Poor study, provide an empirical grounding to these theoretical insights. Drawing on participatory assessments, the study reveals how poor and marginalised people frequently perceive state institutions as arrogant, corrupt, and unresponsive. Despite being willing to participate in governance, poor communities often experience participatory processes as performative rather than transformative, marked by procedural engagement with little influence on outcomes (Narayan et al., 2000).

This critique is echoed in South African scholarship on participatory development and cultural policy, which warns that without intentional design elements, such as multilingual access, culturally sensitive facilitation, and mechanisms for integrating diverse knowledge systems, participation risks becoming a legitimising ritual rather than a redistributive practice (Buccus, 2021; Cornwall, 2008; Buccus & Hicks, 2011). Fraser (2021) also insists that participatory structures should not suppress difference in the pursuit of technocratic consensus but should enable spaces of contest where marginalised groups can challenge dominant norms and institutional logics.

While national frameworks such as SEIAS and the NDPF invoke the language of inclusivity, critical scholarship encourages us to examine how such mechanisms function within broader structures of power. Although scholars such as Fraser (2021), Gaventa (2004), and Hadisi & Snowball (2020) do not analyse SEIAS directly, their frameworks offer valuable tools for interrogating the conditions under which participatory instruments either reproduce or disrupt existing hierarchies. These perspectives shift attention away from participation as a procedural checkbox toward a deeper concern with power redistribution, knowledge recognition, and institutional responsiveness - questions that are especially pertinent in assessing the effectiveness of SEIAS in the development of the Revised White Paper.

2.5.6 The potential of co-creation in policymaking

Emerging debates in public policy and governance literature have increasingly foregrounded co-creation as a response to the limitations of traditional, top-down participatory models. Scholars such as Ansell and Torfing (2021) conceptualize co-creation as a deliberative and collaborative process in which state and non-state actors jointly participate in designing, implementing, and evaluating public policy. Unlike consultation, which often presumes expert dominance and unidirectional input, co-creation seeks to redistribute authority, enable mutual learning, and promote shared ownership of outcomes (Ansell & Torfing, 2021; Leino & Puumala, 2021).

This shift from procedural inclusion to collaborative policymaking has been positioned as a critical intervention in addressing what Arnstein (1969) suggests as window-dressing participation, where citizens may be heard but ultimately remain powerless. Co-creation challenges this logic by disrupting hierarchical knowledge regimes and legitimizing community-based, experiential, and indigenous epistemologies alongside technical expertise (Ehlen et al., 2017; Ferreira et al., 2022). As such, it represents both a normative and methodological alternative to what Brooks (2017) critiques as technocratic engagement.

Central to co-creation is the idea of mutual value creation, which reconfigures the relationship between the state and citizens from one of service delivery to one of reciprocal engagement (de Jong et al., 2019; Jansma et al., 2022). In this model, citizens are not passive recipients of policy but active co-producers of both the process and its outcomes. This orientation introduces a reconceptualization of accountability and legitimacy in policymaking, aligning more closely with democratic and emancipatory ideals (Ferreira et al., 2022). The literature on emancipatory participation further extends the theoretical scope of co-creation by calling for dialogical processes that foreground the agency and knowledge of historically marginalized groups (Ferreira et al., 2022; Fraser, 2021). This mode of engagement emphasizes equality in participation, viewing policymaking as a negotiated and co-owned endeavour rather than a one-way mechanism of state control.

Despite its growing prominence in governance studies, the application of co-creation to cultural policy remains relatively under-theorized. Most co-creation scholarship focuses on service delivery, public administration, and health policy (Ansell & Torfing, 2021; Leino & Puumala, 2021), with limited attention to how these frameworks translate into the domain of arts, culture, and heritage. Cultural policy, as noted by Hadisi and Snowball (2020), has often relied on centralized, elite-driven processes that marginalize grassroots cultural expressions and informal cultural economies. This gap in the literature suggests a need to examine whether co-creation can offer a viable alternative for democratizing cultural governance and embedding more inclusive policymaking practices.

Moreover, the theoretical implications of co-creation challenge dominant assumptions about the locus of cultural authority. Where traditional cultural policy has privileged state-led definitions of heritage and identity (Nawa, 2012; Sirayi, 2004; Van Graan, 2013), co-creation

foregrounds cultural identity as fluid, contested, and co-constructed through participatory processes. Scholars argue that such an approach may better reflect the dynamic and pluralistic nature of culture in postcolonial and deeply unequal societies (Leino & Puumala, 2021; Ferreira et al., 2022).

Yet, critical perspectives have cautioned that co-creation, like other participatory paradigms, risks being co-opted or diluted if institutional structures are not designed to support genuine power-sharing (Gaventa, 2004; Nabatchi & Leighninger, 2015). The literature remains divided on whether co-creation constitutes a substantive shift or simply a rhetorical repackaging of participatory ideals. This tension underscores the importance of contextual specificity in assessing the actual practice of co-creation within particular policy domains and institutional settings.

In sum, while co-creation offers a framework for reimagining participatory governance in a way that centres inclusivity and the recognition of multiple knowledges, its potential relevance to cultural policymaking, especially in contexts marked by historical exclusion, warrants further investigation

2.5.7 Accountability in participatory governance

A significant body of scholarship underscores the indispensable role of accountability in rendering participatory governance both meaningful and democratically legitimate. Gaventa (2004) cautions that participatory mechanisms that lack institutional responsiveness risk reproducing citizen disillusionment, particularly when engagement is not followed by visible shifts in policy decisions or implementation. Within this literature, accountability is not merely a procedural afterthought but a constitutive element of democratic practice, an ongoing negotiation between the state and citizens about who has the right to influence decisions and how that influence is recognized.

Frewer and Rowe (2005) argue for structured systems that close the feedback loop between participation and decision-making, identifying tools such as advisory boards, public communication strategies, and participatory monitoring systems as critical for tracking the uptake of citizen input. The literature thus shifts the discussion of participation from questions of access and inclusion toward questions of institutional receptivity and responsiveness.

This emphasis on accountability as a dimension of democratic quality also intersects with critiques of technocratic governance. Scholars such as Cooke and Kothari (2001) problematize the tendency within public administration to instrumentalize participation, using it as a procedural formality that legitimates predetermined policy choices rather than transforming them. For Brooks (2017), participatory reforms are often framed within managerialist discourses of good governance, which emphasize performance, efficiency, and stakeholder compliance over deeper questions of power and structural change. Within this framing, participation is encouraged only insofar as it aligns with existing institutional goals, effectively narrowing the space for redistribution.

In this context, accountability becomes constrained by technocratic logics, where participatory processes are decoupled from democratic contestation and instead serve to reinforce administrative control. As Brooks (2017) argues, this undermines the radical democratic potential of participation by insulating policy processes from politicization and critical scrutiny.

In the field of cultural policymaking, where participation implicates questions of identity, recognition, and symbolic justice, these dynamics are especially acute. Participation cannot be divorced from the politics of voice and representation, particularly for historically marginalized cultural actors. Without accountability, mechanisms that are attuned to these dimensions, participatory initiatives risk reproducing the very exclusions they aim to redress.

2.5.8 From proceduralism to transformative participation

A critical strand of the literature on public participation highlights the need to move beyond proceduralist frameworks - where inclusion is often limited to symbolic or consultative roles - towards transformative models that address deeper power asymmetries. While foundational concepts such as Arnstein's (1969) Ladder of Participation remain influential in mapping levels of citizen influence, scholars have since expanded this critique to interrogate how institutional designs can constrain participation to pre-defined state agendas (Cornwall, 2002; Gaventa, 2004). These critiques underscore that the architecture of participation itself often reinforces existing hierarchies unless explicitly reimagined.

In cultural policy specifically, where identity, memory, and recognition are at stake, the politics of participation take on particular urgency. Fraser's (2021) theory of participatory parity emphasizes that meaningful engagement requires dismantling structural inequalities that inhibit marginalised groups from participating as equals. Her notion of 'subaltern counter-publics' is especially relevant in the South African context, where artists, cultural practitioners, and knowledge holders from historically excluded communities often remain peripheral to policymaking—even when formal participatory mechanisms exist (Hadisi & Snowball, 2017; Drummond & Snowball, 2019).

Building on these critical foundations, recent contributions propose more generative and power-aware approaches to participation. Ansell and Torfing's (2021) work on co-creation reframes participation as a dynamic process of shared authority and collective problem-solving, while Freire's (2020) model of dialogical engagement foregrounds participation as a process of critical consciousness and social transformation. Both approaches advocate for inclusive institutional spaces that facilitate mutual learning and value diverse epistemologies—especially those rooted in lived experience and local knowledge.

What emerges from this literature is a consistent call to reorient participatory governance toward redistributive and justice-centred practices. This means not only broadening access but also enabling marginalised publics to shape the framing, agenda-setting, and outcomes of policy processes. Within the arts, culture, and heritage sectors, such a shift is especially critical

given the sector's embedded histories of symbolic erasure, economic exclusion, and cultural marginalisation (Nawa, 2012; Buccus, 2021).

This conceptual trajectory lays a foundation for the present study's interrogation of the SEIAS process—not merely as a procedural mechanism, but as a contested site where the possibilities for meaningful, inclusive, and transformative cultural policymaking are negotiated.

2.6 Conclusion: Towards a transformative participatory paradigm

The literature reviewed demonstrates that public participation in policy processes, particularly within socio-economic impact assessment frameworks like SEIAS, is neither neutral nor empowering. In the context of public policy management, participation is often framed as an administrative requirement, serving procedural legitimacy rather than enabling democratic transformation (Buccus & Hicks, 2011b; Cornwall & Gaventa, 2001; Gaventa, 2004). As such, conventional models of participation tend to prioritize consultation over co-decision-making, reinforcing hierarchical structures and marginalizing alternative epistemologies.

Within the cultural policy sphere, these tensions are further amplified by the historical legacies of colonialism, apartheid, and the ongoing marginalization of indigenous and township cultural actors (Nawa, 2016; Nkondo, 2007; Sirayi, 2004). Cultural policy is not simply about resource allocation or symbolic recognition; it is fundamentally a battleground for contesting narratives, identities, and power. The Revised White Paper thus emerges as a critical site for interrogating how participation is constructed, enacted, and constrained within official policymaking processes.

Key contributions from Fraser, (2021), Cornwall (2001) and (Gaventa, 2004) compel a shift from viewing participation as a procedural add-on to understanding it as a deeply political, power-laden practice. Concepts such as participatory parity, invited as opposed to claimed spaces, and subaltern counter-publics reveal the structural and epistemological barriers that inhibit meaningful engagement (Fraser, 2021, 2024; Gaventa, 2004). Furthermore, scholars highlight how institutional frameworks, however well-intentioned, may inadvertently reinforce exclusion if they fail to accommodate diverse forms of knowledge, language, and cultural expression.

While frameworks like SEIAS purport to democratize policymaking through evidence-based consultation (The Presidency, 2020), critical scholarship suggests that the transformative potential of such instruments depends on their capacity to recognize and redistribute voice, power, and agency (Gaventa, 2004; Miraftab, 2004; C. Tshoose, 2017). This requires moving beyond tokenistic inclusion towards co-creation and dialogic engagement, approaches that demand institutional reflexivity, political will, and cultural sensitivity.

This study is situated at the intersection of these debates, seeking to assess how SEIAS, as applied to the Revised White Paper, mediates the complex dynamics of participation in cultural policy reform. It draws on interdisciplinary insights from public policy studies, participatory

governance, and cultural theory to interrogate the degree to which existing mechanisms enable or constrain democratic voice, especially for historically marginalized cultural actors.

The following theoretical framework builds on these foundations by applying Arnstein's (1969) Ladder of Participation, Fraser's (2021) theory of subaltern counter-publics and Gaventa's (2004) Power Cube to critically examine the spatial, relational, and epistemic dimensions of participation within the Revised White Paper policy process.

2.7 THEORETICAL FRAMEWORK

This study employs an integrated theoretical framework grounded in participatory governance and deliberative democracy to examine how SEIAS facilitated public participation in the development of the Revised White Paper on Arts, Culture and Heritage. Drawing on the central research question - *How did the SEIAS process incorporate and facilitate public participation in cultural policymaking?* - the framework moves beyond descriptive accounts of participation. It interrogates how participation was institutionally structured, how it was experienced by diverse stakeholders, and how it translated into influence on policy outcomes. These questions are situated within the broader post-apartheid governance context, where participatory mechanisms are shaped by enduring inequalities, bureaucratic norms, and contested knowledge systems (Le Roux, 2015; Tshoose, 2015). By engaging with theoretical literature on deliberation, governance, and power, this framework supports a critical analysis of SEIAS's participatory claims and democratic legitimacy.

2.7.1 Participatory governance and deliberative democracy

At its core, this framework is guided by theories of participatory governance, which foreground the institutional and administrative conditions that enable or constrain meaningful public involvement (Fung & Wright, 2003; Cornwall & Gaventa, 2001). This tradition shifts focus away from abstract calls for inclusion to a practical analysis of how participation is structured, who participates, and with what effect.

To complement this, the study engages the literature on deliberative democracy - especially the work of Habermas (1984) and Steiner (2018**)** - which centres on the quality of public reasoning, the exchange of justifications, and the legitimising function of inclusive dialogue. Deliberative democracy is particularly relevant to cultural policy because it emphasises public justification, dialogical inclusion, and the co-construction of legitimacy in policy decisions – features that might be missing in bureaucratised processes like SEIAS.

Together, participatory governance and deliberative democracy provide a dual lens: one rooted in institutional design and access, and the other in discursive quality and mutual recognition. This dual focus is crucial for assessing both who gets to speak and whether their voices matter in policymaking.

2.7.2 Assessing voice, power, and inclusion

To operationalise this theoretical framing, the study draws on three complementary conceptual tools that diagnose how voice, power, and inclusion were structured in SEIAS processes:

Arnstein's Ladder of Participation (1969**)** offer a typology assessing the degree of citizen power in decision-making, distinguishing between manipulation, tokenism, consultation, and genuine control. It provides a lens for evaluating whether SEIAS created conditions for meaningful participation or served as a symbolic legitimising exercise.

Gaventa's (2004) Power Cube disaggregates power into visible (formal procedures), hidden (agenda-setting), and invisible (internalised norms) forms. This helps uncover how SEIAS structured participatory spaces, who was invited, whose voices were amplified or muted, and what knowledge was deemed legitimate.

Fraser's (2021) Theory of Participatory Parity deepens this analysis by focusing on recognition and equal standing. Her concept of subaltern counter-publics is used to examine whether historically marginalised groups - such as rural artists, indigenous practitioners, and informal cultural workers - were meaningfully included and whether their perspectives were treated as valid contributions in deliberative spaces (Fraser, 2021, 2024).

These frameworks, taken together, provide an analytical map for investigating how participatory mechanisms operate, whose knowledge counts, and whether participatory inputs are translated into influence.

2.7.3 Situating SEIAS in the policy process

While participatory and deliberative theories address the democratic ideals of engagement, it is equally essential to situate SEIAS within the broader policy process to understand how participation is institutionally mediated. To do so, the framework draws on Birkland's (2019) policy cycle model, particularly focusing on the agenda-setting and formulation stages, where SEIAS's Initial and Final Impact Assessments are most active. These phases are not neutral as they are sites of contestation where competing interests and institutional logics influence how public input is framed, valued, and acted upon.

Further, Thomas's (1995) managerial model highlights how bureaucratic management mediates participatory processes. It underscores the power of officials to select consultation methods, prioritise stakeholder voice**s**, and determine which inputs are incorporated, or ignored (Thomas, 1995). This policy-institutional lens makes clear that participation is not only about public input but about how institutions structure and translate engagement into decisions within bounded administrative and political constraints (Thomas, 1995)

2.7.4 Accountability, responsiveness, and institutional feedback

Participation without institutional responsiveness risks becoming procedural formalism. Therefore, a critical dimension of this framework is the assessment of institutional accountability and feedback mechanisms. As Frewer and Rowe (2005) and Gaventa (2004) argue, the absence of responsive structures erodes public trust and fosters what Cornwall (2008) refers to as "participation fatigue" (p. 280) - a condition prevalent in post-apartheid South Africa.

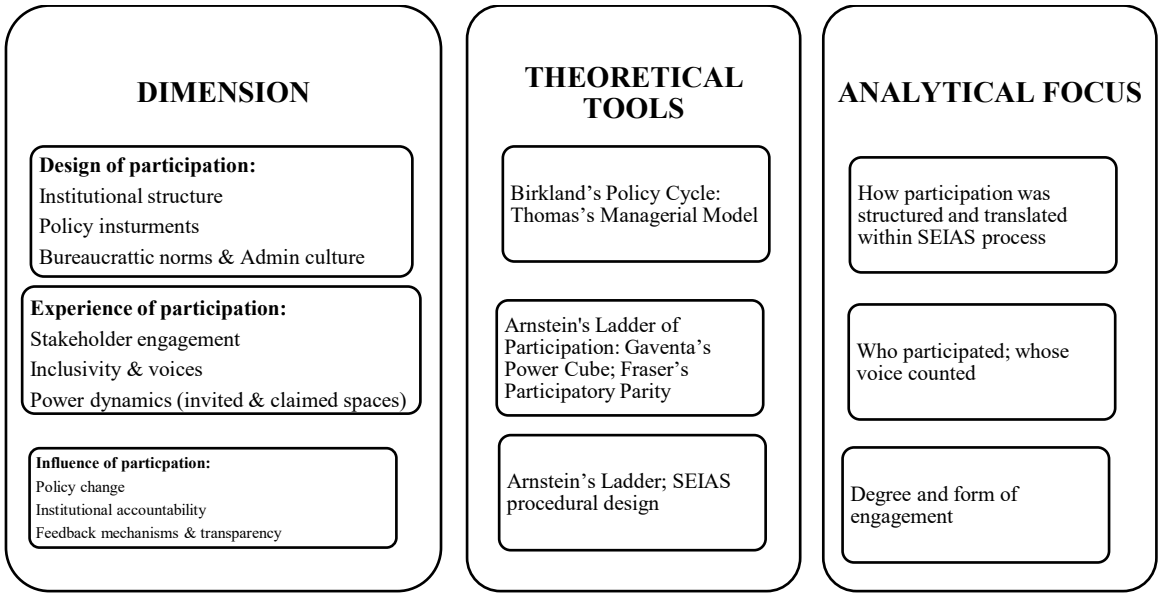
This framework thus interrogates whether SEIAS incorporated mechanisms to:

- Acknowledge and engage meaningfully with stakeholder submissions,
- Facilitate iterative feedback loops that communicated how public input influenced drafts,
- Provide transparent justifications for decisions taken or contributions excluded.

These considerations assess whether SEIAS operated as a genuine participatory mechanism, or whether it functioned as a technocratic exercise with limited democratic value. This dimension reinforces the importance of evaluating not just access to participation, but whether that participation had impact, accountability, and democratic legitimacy.

2.7.5 Conceptual schema: From design to influence

To synthesise the theoretical insights discussed above, this study employs a conceptual schema, illustrated in figure 1, that traces the full arc of participatory governance across three interrelated dimensions:



Source: Developed by the author (2025)

Figure: 1. Conceptual schema: From engagement to impact

This schema integrates the key theoretical perspectives outlined earlier, deliberative democracy, participatory governance, critical policy analysis, and institutional theory, and provides a coherent lens through which the SEIAS process can be critically examined in the context of the Revised White Paper.

Design of participation

This first dimension assesses how public participation was institutionally structured through the SEIAS process. Drawing on Birkland's (2019) policy cycle model and Thomas's (1995) managerial perspective, it focuses on the procedural and administrative design of participatory mechanisms. It considers the timing, methods, and actors involved in facilitating engagement, the inclusivity of participatory spaces, and the extent to which public input was meaningfully incorporated during agenda-setting and policy formulation. This analysis foregrounds the influence of bureaucratic norms and administrative discretion in shaping the scope and depth of participation.

Experience of participation

The second dimension examines how participation was experienced by a range of stakeholders, particularly those from historically marginalised communities. The analysis draws on Fraser's (2021, 2024) theory of participatory parity, Gaventa's (2004) Power Cube, and Arnstein's (1969) Ladder of Participation to interrogate dynamics of inclusion, exclusion, and recognition. This dimension asks who was invited to participate, whose voices were heard or silenced, and whether participants felt valued as equal contributors. It enables a critical evaluation of the fairness, representativeness, and transformative potential of stakeholder engagement in the SEIAS process.

Influence of participation

The final dimension evaluates the extent to which participation influenced policy outcomes and whether institutional mechanisms were in place to ensure responsiveness. Building on the work of Frewer and Rowe (2005), Gaventa (2004), and Cornwall (2008), this axis examines whether SEIAS acknowledged stakeholder inputs, communicated how these shaped policy drafts, and provided transparent justifications for decisions made. It assesses whether SEIAS functioned as a meaningful vehicle for democratic input.

By structuring the analysis around these three dimensions, the schema moves beyond a procedural view of participation to provide a comprehensive, critical, and context-sensitive assessment. It ensures that participation is examined not only in terms of its presence, but in terms of its design, its lived experience, and its policy impact.

This conceptual schema guides both data collection and analysis, serving as a diagnostic framework to assess the effectiveness and democratic legitimacy of the SEIAS process in shaping the Revised White Paper.

CHAPTER 3: RESEARCH METHODOLOGY

3.1 Introduction

This chapter outlines the research methodology employed in this study, detailing the approach, design, and methods used to examine the integration of public participation within the SEIAS as applied to DSAC's Revised White Paper. Given the insights highlighted in the literature review and the broader policy context, especially concerns around technocratic dominance, consultation fatigue and continuous marginalisation of grassroots cultural voices, a qualitative approach was adopted to explore these issues in depth within the SEIAS framework.

The methodology encompasses the research design, data collection methods - including document analysis, focus groups and semi-structured interviews - and analytical strategies. The chapter discusses the rationale behind the methodological choices and provides an overview of the research design, data collection techniques, and analytical strategies. The central focus remains on assessing whether and how participatory mechanisms within SEIAS foster more inclusive, responsive, and democratic engagement in the DSAC policy process.

3.2 Research approach

This study adopts a qualitative research approach, which is well-suited for exploring complex social phenomena such as public participation and institutional responsiveness. As Denzin and Lincoln (2011) and Patton (2002) note, qualitative methods enable researchers to capture the depth of stakeholder perspectives. A qualitative method therefore assists to understand participants experiences of participatory governance in practice.

3.3 Research design: case study method

A case study method is applied to examine the integration of public participation in the SEIAS process, focusing specifically on its application within the DSAC's Revised White Paper. As Yin (2009) emphasizes, case studies are ideal for analyzing real-world phenomena within their specific contexts, particularly where the boundaries between the phenomenon and its context are not clearly evident.

This case was selected for its relevance and policy significance: the Revised White Paper attempts to respond to persistent challenges such as inequality, lack of representation, and uneven cultural development in post-apartheid South Africa (DSAC, 2020). These challenges are especially acute in the cultural sector, where historical patterns of exclusion continue to shape access to resources, recognition, and decision-making (Hadisi & Snowball, 2017; Nawa, 2016; Sirayi, 2004, 2023).

The Revised White Paper provides a unique opportunity to evaluate how public participation is structured, facilitated, and valued within an official policy instrument like SEIAS, which claims to prioritize inclusivity and evidence-based governance (The Presidency, 2020; 2024).

Concentrating on a single case enables an in-depth examination of the extent to which SEIAS operationalizes participatory principles in practice. As Yin (2009) argues, such an approach allows for a focused investigation of specific phenomena within their real-world policy and institutional contexts. In short, the case provides a focused lens through which to investigate both the institutional intentions of SEIAS and the experiential realities of cultural stakeholders engaging in the process.

3.4 Philosophical assumptions: Ontology and epistemology

The research is grounded in a constructivist ontology and an interpretivist epistemology. Ontology, which concerns the nature of reality and what can be known about it, is a crucial foundation for this study. A constructivist ontological stance underscores the belief that social realities, such as the effectiveness of SEIAS, are not fixed or objective but are instead shaped by the interactions and experiences of individuals involved in the process (Babbie & Mouton, 2001; Neuman, 2013; Ritchie et al., 2003). This perspective acknowledges that stakeholders' perceptions of SEIAS are constructed through personal experiences, historical contexts, and social influences, meaning that reality is subjective and varies across different individuals and groups (Ritchie & Lewis, 2003). Within the context of the DSAC's Revised White Paper, which emphasizes the need for inclusive, participatory governance in the arts, culture, and heritage sectors, a constructivist ontology allows for an exploration of how different stakeholders, including policymakers, artists, and cultural organizations, interpret and experience SEIAS as a mechanism for public participation.

Complementing this ontological position, the study adopts an interpretivist epistemology, which focuses on how knowledge is constructed and understood. Epistemology concerns the relationship between the researcher and the researched, as well as the methods used to acquire knowledge (Bryman, 2006; Ritchie et al., 2003; Schwandt, 2001). An interpretivist epistemology recognizes that meaning is derived from subjective interpretations, emphasizing the importance of understanding participants' perspectives within their specific contexts (Ritchie et al., 2003; Saunders et al., 2016). This epistemological stance is particularly relevant given the Revised White Paper's focus on broadening public participation in cultural policymaking, as it ensures that the research captures the nuanced ways in which stakeholders engage with SEIAS and the participatory processes it seeks to promote. The study, therefore, sought to explore and interpret the meanings and experiences that stakeholders attach to SEIAS, rather than attempting to establish absolute or generalizable truths (Schwandt, 2001; Bates & Jenkins, 2007). This epistemological stance is reflected in the data collection and analysis processes.

Therefore, the qualitative research approach, anchored in a case study methodology and informed by constructivist and interpretivist paradigms, enables this study to explore the dynamics of public participation within the SEIAS process. The constructivist ontology acknowledges that reality is shaped through the lived experiences and interactions of stakeholders, while the interpretivist epistemology prioritizes the meanings and understandings that participants attribute to their engagement with SEIAS. By focusing on the DSAC's

Revised White Paper process, this research situates SEIAS within the broader framework of cultural policy development, while examining how participation is structured, experienced, and perceived by those involved. Rather than seeking to determine the overall transformative effect of SEIAS, the study concentrates on assessing how inclusive and effective the participation mechanisms are from a stakeholder perspective.

3.5 Research designs and tools for data collection

This study employed a multi-method approach to data collection, incorporating semi-structured interviews, focus groups, and document analysis to ensure a comprehensive understanding of the public participation process in the SEIAS for the Revised White Paper. Each method was designed to capture different aspects of the process and participants' experiences.

3.5.1 Document analysis

Document analysis, as suggested by Bowen (2009), was employed as a key methodological tool to examine the formal articulation and practical implementation of public participation within the SEIAS process, specifically in the development of the Revised White Paper. This method involved a systematic review of relevant policy, procedural, and stakeholder documents to triangulate data, contextualise institutional practices, and evaluate how participatory ideals were expressed and operationalised.

3.5.1.1 Documents consulted

The following documents were consulted to evaluate how public participation was facilitated, represented, and institutionalised in the development of the Revised White Paper on Arts, Culture and Heritage (2020), with attention to both procedural design and substantive influence:

- White Paper on Arts, Culture and Heritage (1996):
  Reviewed as the foundational post-apartheid cultural policy to assess the original participatory ethos, equity commitments, and institutional goals. This document served as a baseline to trace continuities and departures in the 2020 Revised White Paper.
- Revised White Paper on Arts, Culture and Heritage (2020):
  Analysed to trace how public inputs were integrated across drafts, shifts in policy priorities, and how the document articulated participatory language in comparison to earlier frameworks.
- Mzansi Golden Economy (MGE) Framework (2011):
  Consulted to contextualise how economic development priorities in the cultural sector shaped institutional approaches to participation, and how these influenced the White Paper revision process.
- Presentation by the Department of Sport, Arts and Culture (DSAC) to the Portfolio Committee (PC) on Arts and Culture (5 November 2019):

Used to assess how DSAC reported on its stakeholder engagement strategy, the rationale for revising the White Paper, and the integration of public inputs into policy.

- Parliamentary Monitoring Group (PMG) Report on the PC Meeting (5 November 2019): This meeting summary, compiled by PMG, provided detailed parliamentary records that were analysed to examine oversight, critical engagement with DSAC, and questions around the legitimacy and inclusiveness of the consultation process.
- SEIAS Guidelines and Toolkits (Department of Planning, Monitoring and Evaluation): Including the SEIAS Guidelines for Policy Development (2015) and Socio-Economic Impact Assessment: Let's Grow South Africa Together (2024), these documents offered the normative framework for participatory policymaking and were used to benchmark SEIAS application in the White Paper revision process.
- National Policy Development Framework (2020): Reviewed to evaluate whether the White Paper process aligned with national standards for inclusive, transparent, and evidence-based policy development, particularly with respect to stakeholder participation and iterative feedback mechanisms.

By examining this body of documentation, the study was able to interrogate how public participation was conceptualised in policy, structured through institutional mechanisms, and experienced by stakeholders. This analysis revealed both the normative aspirations of the SEIAS framework and the practical realities of its implementation.

3.5.2 Interviews

Semi-structured interviews were employed to gather in-depth insights from individuals directly and indirectly involved in the Revised White Paper process. This method was particularly well-suited to the study's aims, offering a balance between structure and flexibility that enabled participants to reflect freely while allowing the researcher to maintain thematic consistency across interviews (Adams, 2015).

According to Petrescu et al. (2017), semi-structured interviews foster open and authentic dialogue while preserving methodological rigor—qualities especially valuable in the exploration of complex policy environments. In line with Petrescu et al's (2017) guidance, interviews in this study began with warm-up questions designed to create a relaxed and open atmosphere. The approach proved effective in eliciting rich, context-specific narratives concerning the design, implementation, and perceived impact of SEIAS. It enabled interviewees to discuss both the procedural aspects and the challenges of embedding public participation within policy-making processes.

3.5.3 Focus groups

Focus groups were employed as a key qualitative method to explore collective experiences and perceptions of SEIAS, particularly in relation to its participatory intentions. This method is well-suited for capturing group interaction, surfacing shared understandings, and revealing

differences in opinion, all of which are critical when assessing policy implementation in diverse stakeholder contexts (Neuman, 2013).

The focus group format encouraged open discussion, allowing participants not only to articulate their own experiences but also to respond to and build on the contributions of others (Babbie & Mouton, 2001; Ritchie et al., 2003). Discussions were guided by a semi-structured protocol, which provided thematic direction while allowing for flexibility and emergent topics. This facilitated deeper exploration of how SEIAS was perceived in practice, including its accessibility, inclusivity, and responsiveness.

Used in conjunction with interviews and document analysis, the focus groups enriched the study's capacity to triangulate data and identify recurring themes in the lived experiences of cultural policy stakeholders.

3.6 Sampling

This study employed a purposive sampling strategy, as recommended by Creswell and Plano Clark (2018), in order to include of participants who possessed information of the SEIAS process. Purposive sampling is appropriate for qualitative inquiry because it enables the intentional selection of individuals who are likely capable of providing in-depth and relevant insights (Ritchie et al., 2003). This approach aligns with Patton's (2002) emphasis on selecting information-rich cases rather than relying on statistical representativeness.

Accordingly, three broad stakeholder groups were targeted:

Government officials responsible for SEIAS coordination; an independent research expert, who facilitated the policy development process; a sector organisation representing the arts, culture and heritage sectors and cultural practitioners from historically marginalised communities, whose perspectives are often under-represented in policy processes. This sampling logic enabled a multi-layered analysis of how SEIAS was understood, implemented, and experienced across institutional and socio-economic contexts.

3.6.1 Interviews

Three semi-structured interviews were conducted with individuals selected for their direct involvement in the Revised White Paper SEIAS process. The first participant, a policy analyst, offered strategic insight into how SEIAS was interpreted and implemented within departmental structures. The second participant, a DSAC project manager, provided an operational perspective, illuminating practical challenges encountered during the SEIAS application process. The third participant, an independent research expert, contributed an independent analytical assessment of SEIAS, particularly its participatory and methodological dimensions.

The selection of these informants, as argued by Dexter (2014) and Lilleker (2003), aligns with the logic of elite interviewing, which prioritises, not only depth and expertise, but also access to insider perspectives. Seconded by Marshall (1996), key informants, those with specialised knowledge or strategic positions, are often essential for understanding policy processes. Thus, the three participants selected for this study therefore represented rich cases that highlighted light on the internal functioning of SEIAS in the Revised White Paper context.

3.6.2 Focus groups

Two focus group discussions (FGs) were conducted to explore differentiated stakeholder experiences of public participation within the SEIAS framework. FGs were selected because they facilitate collective meaning-making and negotiation of shared or contested understandings (Kitzinger, 1995; Morgan, 2007). They are also well suited for eliciting perspectives from cultural practitioners whose knowledge is embedded in community dialogue and collective practice.

Participants were identified using DSAC's internal stakeholder database. Two FGs were conducted online to enable broader geographic participation.

The first FG included eight representatives from the national cultural organisation who would have engagement with the Revised White Paper process. Their insights illuminated institutional practices, consultation structures, and formal interpretations of SEIAS.

The second FG included seven cultural practitioners from historically marginalised communities, including township artists, rural cultural organisers, and informal creative workers. Some participants had limited exposure to SEIAS, while others had none, thereby revealing gaps in outreach and procedural inclusion. This group was selected to foreground voices that are frequently excluded from cultural policymaking but remain central to the creative ecosystem.

The inclusion of marginalised cultural practitioners is grounded in Fraser's (2024) theory of subaltern counter-publics, which emphasises the importance of engaging groups historically excluded from dominant policy processes. This approach also draws on the concept of epistemic injustice (Fricker, 2008; Kusch, 2009; Langton, 2010), recognising that unequal power relations often silence or devalue the knowledge of marginalised groups.

This sampling strategy aligns with maximum variation sampling (Patton, 2002), which seeks to capture a broad range of perspectives to illuminate patterns across diverse contexts rather than achieve statistical generalisability. By juxtaposing institutional voices with subaltern experiences, the FGs enabled a comparative analysis of inclusion, exclusion, and procedural justice within SEIAS.

3.7 Data analysis

The study employed thematic analysis, as developed by Braun and Clark (2012, 2006, 2019; Clarke & Braun, 2017) to analyse the qualitative data gathered from interviews and focus groups. Thematic analysis was chosen for its flexibility and suitability in identifying patterns of meaning within qualitative data, especially in research seeking to understand complex experiences such as stakeholder engagement in policy processes. It allowed for an in-depth exploration of how the SEIAS process incorporated and facilitated public participation in the development of the Revised White Paper.

The analysis followed Braun and Clark's (2012) six-phase process, conducted manually without the use of qualitative data analysis software, using a structured, paper-based and spreadsheet-supported system:

1. Familiarisation with the data
   The first phase involved transcribing all interviews and focus group discussions verbatim. The researcher then read and re-read the transcripts multiple times to immerse themselves in the data and develop an overall understanding of participants' experiences and key issues. Initial notes and reflections were written in the margins or on separate sheets to begin identifying early patterns and ideas.

2. Generating initial codes
   The researcher manually coded the data by identifying meaningful segments in each transcript. These were marked by hand and entered into MS Word - short labels were assigned to capture the essence of each segment. Both descriptive and interpretive codes were used to reflect participants' perspectives and underlying meanings.

3. Generating themes
   Codes were then sorted and grouped based on conceptual similarities. This step involved reviewing the list of codes across all data sources and clustering them into themes. This stage produced several thematic categories representing recurring issues across the dataset.

4. Reviewing themes
   The themes were reviewed against the full data set to ensure they accurately reflected the participants' accounts and that there was sufficient data to support each theme. This involved revisiting transcripts to cross-check whether the themes were coherent, distinct, and well-supported. Some themes were refined, combined, or discarded based on their relevance and clarity.

5. Defining and naming themes
   Each theme was then clearly defined in terms of its scope, meaning, and relationship to the research question. Short analytic summaries were written for each theme, supported by direct quotes from participants. Themes were finalised to reflect both the structural conditions of participation and stakeholders' lived experiences.

6. Producing the report
   The final phase involved integrating the themes into a written narrative that responded directly to the research questions. Themes were presented in a logical sequence, with each section supported by illustrative quotes from the data. The analysis was linked to the theoretical framework, enabling a critical interpretation of how participation was designed, experienced, and influenced policy outcomes through the SEIAS process.

This manual approach to thematic analysis ensured a close and immersive engagement with the data. It allowed for a nuanced interpretation that remained grounded in the voices of participants while aligned with the study's conceptual and analytical framework. The process ultimately enabled the researcher to evaluate the practical operation of SEIAS as a participatory tool and to assess its responsiveness to stakeholder input in the context of cultural policy development in South Africa.

3.8 Limitations

This study presents several limitations that may impact its findings, particularly in relation to the current researcher's positionality. First, the qualitative case study design is specifically focused on the Revised White Paper, a national project, which may limit the generalizability of the insights to other sectors, regions, or policy areas.

Furthermore, the use of purposive sampling to select stakeholder participants might limit the diversity of perspectives represented. This approach can potentially reinforce existing power dynamics by over- or under-representing certain voices, particularly those from marginalized or less vocal communities. Although this sampling method ensures the inclusion of informed individuals, it may not capture the full range of experiences and viewpoints across the broader population.

The reliance on semi-structured interviews also presents a limitation, as it restricts both the sample size and the breadth of insights gathered. This may not fully capture the broader scope of SEIAS's impact, particularly in terms of measurable outcomes related to public participation. Moreover, a focus on qualitative data, while valuable for understanding nuanced experiences, may not translate directly into concrete metrics or clear conclusions regarding the effectiveness of the SEIAS framework.

Nonetheless, the study mitigates these limitations by triangulating data from multiple sources, including policy documents, expert interviews, focus groups, and participant observations, to provide a more robust and balanced view of the topic. The researcher has also actively engaged in reflexivity throughout the research process, critically examining their positionality and potential biases in order to enhance the credibility and trustworthiness of the study's findings.

These limitations highlight the inherent challenges of qualitative research methodologies, particularly in a policy context. However, by emphasizing the inclusion of diverse perspectives and addressing researcher positionality, the study contributes valuable insights into SEIAS and

its impact on various stakeholders, while paving the way for more comprehensive and inclusive research in the future.

3.9 Positionality

This discussion of positionality reflects a component of reflexive research practice, as described by scholars such as Finlay (2002). As the researcher, being employed by DSAC as a research manager and the project manager for the SACO, this introduces the potential for bias in both data collection and analysis. This institutional affiliation may shape assumptions about stakeholders, influence the formulation of questions, and subtly affect the interpretation of responses. Recognising these risks, the researcher embarked in continuous reflexivity, critically examining how his professional background, institutional role, and pre-existing relationships with DSAC might shape meaning-making throughout the study.

In line with Finlay's (2002) emphasis on intentional, transparent self-reflection, the researcher maintained a reflexive stance during the stages of the research process. This included deliberate efforts to compensate positional bias by purposively seeking out a diverse range of stakeholders to ensure representation of multiple, and marginalised perspectives. Such diversification helped to mitigate the reinforcement of institutional power dynamics and guarded against privileging particular viewpoints. By integrating this reflexive awareness and methodological caution, the study sought to strengthen the trustworthiness of its findings while explicitly acknowledging the researcher's positionality as an interpretive lens that inevitably shapes the research.

3.10 Ethics

To ensure the ethical integrity of the study and protect the rights of participants, the research followed Wits University Human Research Ethics Committee guidelines. First, participants were fully informed about the purpose of the study and they provided consent before any involvement, ensuring that they understood the scope of the research and what was expected of them. In addition, the study upheld the principle of self-determination, meaning that participants had the right to ask questions, decline to share any information if they felt uncomfortable, and withdraw from the study at any point without facing any negative consequences. Participants' dignity was prioritized throughout the process, and every effort was made to ensure they were treated with respect, avoiding any behaviour that could cause embarrassment or discomfort. To protect their privacy, all personal identifiers have been kept confidential, with data securely stored and anonymized through the use of coding systems. Lastly, the study maintained transparency in its reporting, presenting findings honestly, whether the results are favourable or not. These ethical measures guided the study's implementation, ensuring that participants' rights and well-being were safeguarded throughout the research process.

3.11 Quality assurance: Trustworthiness, validity and reliability

Ensuring methodological rigour was essential in this study, given its focus on public participation within the SEIAS for the Revised White Paper. Because the research adopted a qualitative, constructivist, and interpretivist design, it relied on established strategies to enhance trustworthiness, drawing on Lincoln and Guba's (1985) criteria, namely, credibility, transferability, dependability, and confirmability - alongside contemporary discussions of qualitative validity (Creswell & Poth, 2018). These criteria guided the study's approach to quality assurance and ensured that the findings were methodologically sound and credible.

3.11.1 Credibility for internal validity

Credibility refers to the degree of confidence that can be placed in the truth and plausibility of the research findings, and, as suggested by Guba and Lincoln (1985), it is a key criterion of trustworthiness in qualitative research. To enhance credibility, this study employed methods of data collection, namely, document analysis, semi-structured interviews, and focus groups, allowing for methodological triangulation (Denzin, 1978). This triangulation enabled the comparison of institutional perspectives with the lived experiences of stakeholders in the cultural and creative sector, thereby strengthening the interpretation and internal coherence of the analysis.

Furthermore, the researcher's prior engagement within the DSAC policy environment provided valuable contextual understanding; however, recognising the potential for interpretive bias arising from this positionality, a reflexive journal was maintained in line with Finlay's (2002) and Lincoln and Guba's (1985) recommendations. This reflexive practice ensured continuous self-examination and transparency regarding how the researcher's assumptions, professional background, and institutional location might influence meaning-making and analytical choices.

3.11.2 Transferability for external validity

Transferability concerns the extent to which the findings may be applicable to contexts beyond the specific case of the Revised White Paper SEIAS process. Instead of claiming statistical generalisability, qualitative research supports transferability by providing rich, detailed descriptions of context (Babbie & Mouton, 2001). This study offers thick description of the policy environment, including an account of the SEIAS framework, the institutional history of the White Paper process, the socio-political context of South African cultural policy, and the characteristics of the participants who engaged in the study. These detailed contextual accounts enable readers to make informed judgements about whether the insights gained from this case may be relevant to other government-led participatory processes (Babbie & Mouton, 2001). The study also provides a transparent explanation of the sampling rationale, particularly the decision to include both institutional actors and marginalised cultural practitioners, which enhances the potential applicability of the findings to broader discussions of state-led participation.

3.11.3 Dependability

Dependability or reliability refers to the consistency and stability of the research process over time (Babbie & Mouton, 2001). To ensure reliability, the study maintained a detailed audit trail that documented all major decisions, including the selection of participants, the development of data collection protocols, the coding procedures, and the steps used in the thematic analysis (Babbie & Mouton, 2001; Lincoln & Guba, 1985). The analytic process, following Braun and Clark's (2012) approach to reflexive thematic analysis, provided a systematic and transparent framework for organising the data, generating codes, constructing themes, and producing the final interpretation. This structured approach strengthened the reliability of the analytic process while still enabling the interpretive flexibility needed for a constructivist study. Dependability was also enhanced by applying the same coding framework across all data sources, documents, interviews, and focus groups, allowing for consistent comparison and interpretation.

3.11.4 Confirmability

Confirmability refers to the extent to which the findings reflect the data rather than the researcher's assumptions (Babbie & Mouton, 2001). In this study, confirmability was supported through the systematic use of reflexive practice. A reflexive diary was maintained throughout the research process, documenting the researcher's positionality as a DSAC project manager and noting moments where experience or institutional knowledge could influence interpretation. Reflexive engagement is an essential component of decolonial and interpretive methodologies (Chilisa, 2019), particularly in research that addresses power, participation, and representation. Triangulation across diverse data sources further strengthened confirmability by ensuring that no single perspective dominated the interpretation.

CHAPTER 4: PRESENTATION OF DATA

4.1 Introduction

This chapter presents data from the qualitative investigation into the extent to which the Socio-Economic Impact Assessment System (SEIAS) facilitated meaningful public participation in the development of the 2020 Revised White Paper on Arts, Culture and Heritage. The analysis is guided by the central research question: *How did the SEIAS process incorporate and facilitate public participation in the development of the Revised White Paper on Arts, Culture and Heritage?*

To explore this question, the study draws on three data sources: semi-structured interviews with key informants, focus group discussions with stakeholder groups, and an analysis of relevant policy documents. These sources provide both institutional and experiential perspectives on the implementation of SEIAS.

Semi-structured interviews were conducted with three key informants: a policy analyst involved in SEIAS processes with the Department of Sport, Arts and Culture (DSAC), a project manager from DSAC, and an independent research expert who contributed technical input and facilitated the SEIAS process. These interviews offer a governmental and advisory viewpoint on how public participation was formally conceptualised, structured, and carried out within the SEIAS framework.

Two focus groups were convened to capture the voices of actors affected by the policy process. The first comprised representatives from national cultural organisations, some of whom had been involved in formal consultation meetings. The second included artists, cultural workers, and organisers from historically marginalised communities. Although participants reported engaging in public meetings related to the White Paper, none recalled explicit reference to SEIAS, suggesting the process was not clearly communicated or differentiated within broader participatory activities. These accounts offer critical counterpoints to official narratives and reveal how public participation was experienced—or rendered invisible—by those on the ground.

Table 1 below summarises the composition and roles of all participants involved in the data collection process.

Table 1. **Participant information and data collection methods**

Participant Code	Affiliation/Role	Data Collection Method	Description
KI1	Policy analyst involved in SEIAS with DSAC	Key Informant Interview	Provided insights into SEIAS design and implementation
KI2	Project manager, Department of Sport, Arts and Culture	Key Informant Interview	Shared DSAC's role in policy development and stakeholder engagement
KI3	Independent Research Expert	Key Informant Interview	Offered technical perspective on SEIAS processes
FG1	Artists from a marginalised community	Focus Group Discussion	Reflected on access to and awareness of public participation processes
FG2	Representatives from arts and cultural organisations	Focus Group Discussion	Shared experiences of consultation during the White Paper process

Source: compiled by author.

In this study, marginalisation is understood not only in terms of socio-economic exclusion but also as a product of systemic and institutional barriers that prevent certain cultural groups from fully participating in policymaking processes (Fraser, 2021; Nawa, 2016). While this framing is conceptual, it informed the methodological choic**es** made during the sampling process. Specifically, the study adopted a purposive sampling strategy aimed at including participants whose voices are often overlooked or excluded from formal cultural policy processes. This ensured that the research design aligned with the study's broader commitment to exploring epistemic justice and participatory parity.

The chapter proceeds as follows: Section 4.2 analyses how public participation is framed in key policy and regulatory documents. Section 4.3 presents the institutional perspectives gathered from key informants. Section 4.4 focuses on stakeholder experiences, with special attention to perceived barriers, exclusions, and possibilities for more inclusive engagement. These sections are thematically organised around issues of symbolic consultation, technocratic dominance, inaccessible policy language, institutional gatekeeping, and uneven power dynamics. Together, they lay the groundwork for the critical discussion and synthesis in Chapter 5.

4.2 Participation in cultural policy: Principles and practice

This section examines how public participation was formally defined and structurally embedded in the policy framework guiding the Revised White Paper process. It focuses on the normative commitments set out in national policy instruments - namely the SEIAS Guidelines,

the NPDF, and the Revised White Paper itself - and assesses how these documents framed the purpose, scope, and modalities of stakeholder engagement.

4.2.1 Participation as a policy principle

Public participation is a foundational principle in South Africa's policy development, including within the arts, culture, and heritage sectors. This commitment is enshrined in several key policy and legal instruments, including the Constitution (South Africa, 1996), which guarantees the right of citizens to participate in governance (Section 195), and the NPDF (The Presidency, 2020), which positions participation as central to transparent and accountable policymaking. In the cultural sector, the White Paper of 1996 (DACST, 1996) and the Revised White Paper of 2020 (DSAC, 2020) affirm the importance of inclusive consultation with stakeholders, particularly marginalised communities, to inform policy content and legitimacy. These frameworks collectively reinforce the normative value of public participation in advancing democratic governance, inclusivity, and responsiveness in cultural policy processes (Karriem & Hoskins, 2016).

The NPDF underscores public participation as a fundamental aspect of policy-making, aligning with the constitutional mandate to ensure that all citizens have the right to participate in the cultural life of their choice. It emphasizes that "policy development must be inclusive, transparent, and accountable", advocating for processes that "engage stakeholders at all stages of policy formulation and implementation" (The Presidency, 2020). This approach ensures that policies reflect the diverse needs and aspirations of the population, particularly those historically marginalized.

Building upon this, the SEIAS Guidelines operationalize the principle of participation by mandating departments to conduct both Initial and Final Impact Assessments (IIAs and FIAs) (DPME, 2015). These assessments require the identification of stakeholders and structured consultations throughout the policy development cycle (The Presidency, 2020). The Guidelines state that "stakeholder engagement is not positioned as a one-off exercise, but rather as a sustained process aligned with the stages of drafting, revision, and finalisation" (The Presidency, 2024). Moreover, the publication of FIA reports, alongside draft policies, facilitates public scrutiny and feedback, reinforcing the commitment to transparency and accountability (The Presidency, 2024).

The 1996 White Paper on Arts and Culture, articulates a vision for a democratic cultural policy, emphasizing the importance of public participation in the arts, culture, and heritage sectors. It asserts that "a new vision for the arts, culture and heritage is required", one that is "guided by the prescriptions of the Constitution of the Republic of South Africa of 1996 regarding competencies between national and provincial levels" (DACST, 1996). The Paper highlights the establishment of the National Arts Council (NAC) as a statutory body to promote equity and access, ensuring that "representation on the Board of the National Arts Council will be both provincial and art specific," with appointments made through a "publicly transparent

process" (DACST, 1996). This initiative aims to facilitate broad-based participation in decision-making processes.

The Revised White Paper (2020) builds upon its predecessor by further emphasizing the need for inclusive policymaking. It advocates for "an inclusive approach to policy-making that ensures the realities and aspirations of all parts of the arts, culture and heritage sector, especially those traditionally excluded, are taken into account" (DSAC, 2020). This document reflects a commitment to engaging a wide range of sectoral stakeholders, ensuring that policies are responsive to the diverse needs of the population.

Across these policy frameworks, public participation is not merely a procedural formality but a substantive principle that guides the development of policies in the arts, culture, and heritage sectors. By setting out the need to institutionalize stakeholder engagement through structured assessments and transparent processes, these documents collectively aim to create policies that are inclusive, equitable, and reflective of the diverse cultural tapestry of South Africa.

4.2.2 How officials envisioned participation in practice

While institutional policy frameworks such as the SEIAS Guidelines (2015) and the NPDF (2020) clearly advocate for structured, inclusive, and standardised participation, the practical implementation of these principles is far more complex. Key informant interviews revealed a tension between the vision of participation embedded in SEIAS and the realities of application within government departments.

The policy analyst involved in SEIAS with DSAC highlighted that both SEIAS and the NPDF were designed to guide departments towards a coherent, participatory policy-making process. She explained:

> *"We advocate, and one of our mechanisms is consultation, and the importance of it is contained within the SEIAS guidelines of 2015. But also, in 2020, we published the National Policy Development Framework, and it was approved by Cabinet. We use that as a guide as well to codify and standardize policy-making within the public service" (KI1).*

Central to this vision is the principle of early and ongoing engagement. As she further noted, "In that document as well, we emphasize the importance of early consultation, not just with departments and with other stakeholders, but with the public as well" (KI1). This vision aligns with SEIAS's formal requirement for iterative consultation across both the Initial and Final Impact Assessments. Illustrating this expectation, the SEIAS analyst explained that consultation is embedded directly into the assessment process:

> *"…a key part that we have within our reporting and in our assessment templates is the section on consultation. So within that section, we would like the policy or legislative drafter to unpack who they have consulted thus far, what were their views,*

and has it been incorporated" (KI1).

Participation, she stressed, must therefore be "iterative and continuous, not a single meeting or survey" (KI1). This understanding was reinforced by the independent research expert: "SEIAS was never intended to be a box-ticking exercise. It's a participatory model that should inform every stage of policy development, not just a formality at the end" (KI3).

This ideal was also reflected in the account of the DSAC project manager, who facilitated national consultations for the Revised White Paper. She explained: "We tried to reach all nine provinces, and ensured that each unit, whether performing arts, visual arts, or heritage, had someone in the room to represent its interests" (KI2). These engagements involved presentations, structured dialogues, and the integration of public submissions into revised policy drafts. As she noted, "The inputs gathered from the public during the consultations were used to revise the draft White Paper. It was not a symbolic process; it did influence the final document" (KI2).

However, the interviews also revealed significant gaps between these participatory ideals and their realisation in practice. One of the most substantial barriers identified by the SEIAS analyst is the absence of a legal mandate compelling departments to conduct public participation.
As she explained,

> *"There is nothing that says that the public must be part of your SEIAS process. Also, it's very important to note that SEIAS is not legislated, so we don't have anything that legally binds departments to implement our guidance to the tee, to the letter" (KI1).*

Without legislative authority, SEIAS often lacks enforcement power, resulting in uneven implementation. The analyst further highlighted that; "Sometimes… we find that some departments bypass the SEIAS process. They don't want to comply. They see it as a compliance stick, an unnecessary burden" (KI1); meaning that some departments actively avoid the SEIAS process, viewing it as bureaucratic rather than developmental.

Even when departments attempt to comply, they often do so at the final stages of policy development, which undermines the intended value of SEIAS. As she noted:

> *"Another challenge in SEIAS is that departments come at the tail end of policy-making when they need the certification of SEIAS to be able to go to Cabinet… You don't get the full value-add of SEIAS then" (KI1).*

These challenges significantly constrain the transformative potential of public participation. The analyst herself acknowledged the limitations of government outreach, stating, "In practice, it's often hard to reach beyond the same networks" (KI1). Similarly, the DSAC project manager reflected on the need for deeper, community-centred engagement; "There is a need to implement a bottom-up approach in policy-making. Programmes should be designed to align with both community needs and government objectives" (KI2).

The independent research expert added a further layer of complexity, noting capacity constraints within departments; “The intent was there, but implementation was uneven. Often, those closest to the communities lacked the training to conduct effective impact assessments” (KI3). He also highlighted that the participatory elements of SEIAS are often invisible to the public; “SEIAS was happening behind the scenes. People were involved but didn’t know what they were participating in” (KI3).

Taken together, these insights illustrate the persistent gap between the institutional ideals of inclusive participation and the realities of bureaucratic practice. While SEIAS and the NPDF articulate a strong vision for early, continuous, and meaningful public engagement, implementation remains constrained by limited enforcement mechanisms, uneven departmental buy-in, and structural barriers to broad outreach. Bridging this gap is essential to ensuring that participation becomes a substantive mechanism shaping policy outcomes, rather than a procedural formality.

4.2.3 Awareness and stakeholder positioning

A central theme that emerged from both focus group discussions was the widespread lack of awareness of the SEIAS among participants. Despite officials’ emphasis on broad-based consultation, there was a clear lack of awareness among stakeholders regarding SEIAS as a formal policy tool. This was especially evident in focus group discussions, where participants expressed confusion and frustration over not being informed that their input was part of a socio-economic impact assessment.

One participant from a cultural organisation in focus group voiced their astonishment by stating, “I have never heard of SEIAS before this discussion. No one ever explained that there was a separate process for impact assessment” (FG2). This reaction was not isolated. Another participant, who had attended several consultation meetings, added, “We were aware of consultations for the White Paper, but SEIAS? That’s completely new to me. There was no mention of it in any of the meetings I attended” (FG2).

This disconnects points to a communication gap between government facilitators and stakeholders regarding the distinct role of SEIAS in the policy development process. Although FG2 participants were actively involved in consultation processes related to the Revised White Paper, the SEIAS component appears to have been insufficiently communicated or embedded within those engagements. As a result, participants did not clearly distinguish between general consultations and the specific framework of socio-economic impact assessment. This suggests that while public engagement may have taken place, the structure and purpose of SEIAS were not made transparent to those outside of formal policy or administrative circles. Consequently, even stakeholders who were well-placed to participate in policy development processes were unaware of the assessment mechanisms underpinning those decisions.

Even those who were involved at higher levels of engagement, including national workshops and parliamentary hearings, confirmed that SEIAS was not mentioned. A participant explained,

“We did go to Parliament, but in the provinces, we were not invited. We only got to Parliament when we did the presentation. But SEIAS? No, we were not informed about that” (FG2). This sentiment was further echoed by another respondent who reflected on their interactions with policy consultants, saying, “No, no, no. Maybe you did it yourselves. Didn’t you work with Professor Oliphant?... Yes, we consulted with him, but we were not told it was SEIAS” (FG2).

Similarly, participants from Focus Group 1 (FG1) expressed a lack of awareness regarding SEIAS. One participant remarked, “I have never heard of SEIAS before this discussion. No one ever explained that there was a separate process for impact assessment” (FG1). These statements illustrate a profound disconnect between public participation efforts and the formal mechanisms used to evaluate and integrate such input. Participants' lack of awareness of SEIAS as an assessment tool reflects a broader issue regarding how policy processes are communicated and framed to stakeholders.

The SEIAS Guidelines require departments to publish the FIA report alongside the proposal on their websites, unless both documents contain matters affecting national security that may be classified. This requirement aims to promote transparency in policy development and contribute to the body of knowledge for policy and legal experts involved in public policy and lawmaking.

However, the experiences of participants suggest that this transparency was not effectively realised. The failure to explicitly connect their contributions to SEIAS undermined participants’ understanding of their own role and impact in the policymaking process. This lack of clarity contributed to confusion, frustration, and a sense that the process lacked transparency and integrity.

In summary, the lack of awareness and understanding of SEIAS among participants highlights gaps in communication and transparency within the policy development process. To enhance the effectiveness and legitimacy of public participation, it is crucial that stakeholders are adequately informed about the frameworks guiding their involvement and the broader policy context in which their input is situated.

4.2.4 The Portfolio Committee presentation: A narrative of consultation and SEIAS

The DSAC Portfolio Committee (PC) presentation delivered by DSAC offers critical insight into how public consultation and the SEIAS process were officially framed and communicated within government structures (DSAC, 2019). The purpose of the briefing was to update DSAC’s PC in Parliament on the revision of the 1996 White Paper on Arts, Culture and Heritage, including key milestones, timelines, stakeholder engagements, and the current status of the revised policy (DSAC, 2019). This presentation serves as a valuable entry point into the government’s narrative of inclusion, consultation, and procedural compliance within the SEIAS framework.

The presentation outlines the rationale for the review, emphasising that the 1996 White Paper had become outdated and misaligned with contemporary policy priorities and sectoral realities (DSAC, 2019). The revision process was described as one aimed at identifying weaknesses in the original policy, proposing methodological improvements, and recommending priority interventions to reposition the arts, culture and heritage sector as a driver of transformation, inclusive development, and alignment with national strategies.

DSAC reported that following the First National Indaba in November 2015, a structured working plan was adopted in February 2016 (DSAC, 2019). Consultations were held across all nine provinces between April and June 2016, along with targeted engagements involving national departments, public agencies, and provincial arts, culture and heritage departments. Successive drafts were produced: the Second Draft in November 2016 (presented at the National Indaba), the Third Draft in February 2017, and the Fourth Draft in October 2017. These iterations were informed by public submissions and institutional feedback, culminating in briefings to the Portfolio Committee in 2017 and 2018 (DSAC, 2019).

Crucially, the presentation describes the SEIAS process undertaken by the South African Cultural Observatory (SACO), which commenced in April 2017. A first draft of the SEIAS report was submitted in August 2017, with a revised version completed in February 2018. Interdepartmental consultations followed in April 2018. Final submissions were made to the DPME in mid-2018, resulting in the issuance of a provisional certificate in August 2018. This enabled DSAC to present to Cabinet, leading to Cabinet approval in August 2018 and parliamentary tabling in October 2018 (DSAC, 2019).

While the presentation describes the policy development as both consultative and inclusive, it does not indicate whether the FIA was made publicly available or how the SEIAS process was communicated to participating stakeholders. There is no evidence that affected communities were explicitly informed that their engagements were part of a structured SEIAS process, nor were the requirements for stakeholder review and feedback on the FIA addressed, as stipulated in the SEIAS Guidelines (DPME, 2015).

These silences are reinforced in the Parliamentary Monitoring Group (PMG) meeting report of the same PC meeting (PMG, 2019). Committee members welcomed the briefing but raised substantive concerns, including the absence of timelines, the challenges of implementation, and the limited institutional monitoring capacity within the sector. Questions were raised regarding the safeguarding of indigenous knowledge systems and the inaccessibility of technical training due to the limited number of black-owned academies (PMG, 2019). DSAC acknowledged these concerns, noting that implementation would be progressive and constrained by budgetary limitations, particularly across municipalities (PMG, 2019).

In response to the Committee's reservations, DSAC representatives emphasised that the SEIAS study was intended to anticipate practical implementation challenges (PMG, 2019). Nonetheless, the absence of clear communication regarding SEIAS's participatory scope, and the continued reliance on technocratic processes, limited the public's awareness and ability to

scrutinise the process. While the Committee expressed a readiness to endorse the White Paper, it also called for clearer follow-through, more robust implementation mechanisms, and stronger alignment between policy commitments and actual sectoral needs (PMG, 2019).

Taken together, the DSAC's 5 November 2019 presentation and the Portfolio Committee's meeting report reveal a complex interplay between government narratives of participatory compliance and the institutional opacity that undermines meaningful public engagement. Although the government reported extensive consultation and interdepartmental coordination, the invisibility of SEIAS to most stakeholders and the absence of public-facing feedback mechanisms cast doubt on the authenticity of participation. These dynamics are further explored in the next section, which analyses stakeholder experiences of exclusion, fragmentation, and marginalisation in the Revised White Paper process.

4.3 Barriers to meaningful participation

The implementation of SEIAS within the Revised White Paper process exposed significant barriers to meaningful participation, particularly among marginalized communities and cultural organizations. These barriers went beyond logistical challenges, revealing deeper structural, procedural, and communicative shortcomings that undermined the goal of inclusive policy development. As a result, the process often excluded the very groups it aimed to empower - marginalized communities, independent cultural workers, and small arts organizations - leading to feelings of disillusionment and exclusion among participants.

4.3.1 Symbolic consultation and exclusion

A consistent concern across all respondent groups was that public consultation under SEIAS often functioned as a symbolic gesture rather than a substantive engagement. Several participants described a performative quality to the consultations, where decisions appeared to have been predetermined. As one participant from the marginalised community noted, "Sometimes they call us to the table, but they've already made up their minds. Our presence becomes symbolic, not impactful," (FG1). Similarly, a participant from the cultural organisation echoed this frustration, stating, "It felt like a performance rather than a conversation. We spoke, but did they listen?" (FG2).

The independent research expert corroborated these views, suggesting that consultations were more procedural than participatory. "On paper, it reflects the constitutional mandate for public participation. But in reality, it's often a tick-box exercise" (KI3). This critique was shared by the SEIAS policy analyst, who acknowledged that although SEIAS mandates stakeholder engagement, "it tends to rely on departmental discretion, which can limit the depth and sincerity of participation" (KI1). The DSAC Project Manager admitted that "the intent was there, but the execution did not always ensure inclusive, responsive input" (KI2) A participant from the marginalised community succinctly captured the frustration of many, saying, "If this process is supposed to assess impact, why weren't we told about it? We are the ones affected, but we were never invited" (FG1). These experiences contributed to a pervasive sense of

frustration and disillusionment, particularly as many participants felt their contributions were ignored or dismissed without explanation.

4.3.2 Ineffective communication strategies

Participants highlighted the lack of effective and inclusive communication strategies as a significant barrier to participation. Several respondents noted that information about SEIAS and the Revised White Paper did not reach them in a timely manner, if at all. One participant from a marginalized community remarked, "The information is not trickling down to the relevant people that need to be participating in these processes. It's not" (FG1). Others expressed confusion about the channels used for dissemination, with one noting, "For me, it's just the manner in which these things are coming. It's a barrier... I don't know about it, I don't know which channels are being used" (FG1).

This lack of effective communication was echoed by the independent research expert, who argued that the outreach strategy was "a little bit… policy speak", relying too heavily on bureaucratic language and insufficiently tailored to diverse publics (KI3). More specifically, he critiqued the White Paper itself, observing that "it functioned more as a sectoral document than a comprehensive government-wide policy" (KI3), signalling that the communication failures were symptomatic of a broader conceptual and structural weakness in the policy's design (KI3).

Participants from the cultural organisation focus group also highlighted the need for communication strategies that mirror political outreach efforts. As one participant argued, "Why isn't this kind of work adopting that kind of strategy... like when it's elections? It should reach even underserved lands" (FG2). This suggestion underscored the need for more targeted, widespread, and proactive communication efforts to ensure that information reaches all stakeholders—particularly those historically excluded from policy processes.

Taken together, these insights reveal a significant misalignment between SEIAS's participatory intentions and the communication methods used to enact them. Without accessible, timely, and community-centred communication, meaningful participation becomes structurally unattainable.

4.3.3 Inaccessible policy language and information sharing

Participants also highlighted the inaccessibility of the policy language used in the SEIAS process and the Revised White Paper in particular, which contributed to feelings of alienation and exclusion. One participant from a marginalized group shared, "These policies are written in a language that is not for us. They talk about participation, but how can we engage when we can't even understand what they're saying?" (FG1). The independent expert reinforced this point, expressing concern about the complex and legalistic language, stating, "I don't know how they managed to find what was going on" (KI3).

Moreover, informants felt the Revised White Paper was not only linguistically dense but also conceptually opaque (FG1 & FG2). Both focus groups agreed that there was little to no effort to translate the SEIAS framework or White Paper into more accessible, community-friendly language. This barrier made it difficult for many stakeholders, particularly those from underserved communities, to fully engage with the policy process. Commenting on the Revised White Paper, the independent research expert observed that "even after language editing, it was still not a nice flowing document... full of jargon," highlighting persistent issues with readability (KI3). He further emphasized that the "technical language and legal framing often alienate the very groups the policy seeks to include" (KI3). This concern was echoed by the policy analyst who noted that "many younger artists and creatives lack the legal or policy literacy to interpret what's being proposed" (KI1). Similarly, participants in FG1 expressed feeling overwhelmed by the volume and technical nature of policy documents; as one participant admitted, "Honestly speaking, whenever I look at that White Paper, I feel overwhelmed. I can't even get myself to read the entire document." (FG1), reflecting a broader issue of inaccessible language and format.

Together, these insights underscore the critical need for deliberate translation, simplification, and adaptation of policy texts to ensure accessibility, foster broader comprehension, and support meaningful participation across diverse stakeholder groups.

4.3.4 Administrative and bureaucratic complexity

Another significant barrier to meaningful participation in the SEIAS process was the administrative and bureaucratic complexity embedded within the consultation procedures. The focus groups, particularly those from under-resourced or marginalized communities, described the process as burdensome and exclusionary. Additionally, the independent research expert noted that "the paperwork is ridiculous, you spend more time filling out forms than actually engaging with the issues" (KI3), highlighting how procedural demands diverted focus from substantive engagement. This sentiment was echoed by participants in FG1, who described difficulties accessing SEIAS-related documents, stating, "There is some information on it, but... whenever you click that document, it doesn't appear," indicating that not only was the process complex, but also poorly communicated. FG1 participants, comprising largely emerging artists, similarly expressed frustration with administrative hurdles, with one remarking,

> *"You have to apply in the exact right format, attach all the correct documentation, and still, nothing is guaranteed. Most of us just give up, it feels like it's made to exclude us."*

These accounts illustrate how administrative requirements, far from enabling inclusivity, operate as gatekeeping mechanisms that disproportionately burden those with limited institutional support or policy literacy. Without reform to simplify bureaucratic procedures and improve accessibility, particularly for historically marginalized communities, SEIAS risks reinforcing the very inequities it aims to address.

4.3.5 Hierarchical leadership structures and institutional gatekeeping

Participants also identified hierarchical leadership structures and institutional gatekeeping as barriers to meaningful participation. Many described feeling excluded from decision-making spaces due to their lower positions within organizations or their status as independent practitioners. One participant noted, "As a junior, there's a challenge of being belittled. People despise you because you're on a contract" (FG1). In marginalized communities, younger or freelance participants with relevant expertise also felt excluded from leadership spaces. Another respondent suggested that leadership should not be based solely on rank, stating, "We need leaders who don't just rely on hierarchy. People who've studied or worked on the ground often have more current information" (FG1). These comments highlight the need for more inclusive leadership models that prioritize expertise and lived experience over formal titles or institutional affiliations.

4.3.6 Geographic and structural exclusion

Geographic exclusion emerged as another critical barrier, particularly for rural and remote communities. Participants noted that the consultation process was heavily urban-centric, with little effort made to reach those in underserved areas. One participant captured this frustration by saying, "If you're not already in the system, you don't exist" (FG1). Those from rural areas and townships expressed concern that the SEIAS process and the Revised White Paper simply replicated existing inequalities in access to power and resources. Without deliberate decentralization and outreach to underserved regions, these communities remained marginalized, further entrenching structural disparities.

4.3.7 Inadequate academic training and sector preparedness

A persistent barrier to meaningful participation in cultural policymaking is the significant gap between academic training and the practical, administrative, and legal competencies required in the arts, culture, and heritage sectors. Focus group participants, particularly from marginalized backgrounds, repeatedly highlighted how the absence of structured, sector-specific training left them ill-equipped to navigate complex processes like SEIAS or engage meaningfully with policy frameworks (FG1 & FG2). As one participant from FG1 observed, "We were not taught admin at university... we picked it up when we got to work," underscoring the disconnect between formal education and the real-world demands of the sector.

This lack of preparation was not only attributed to academic institutions but also to the inadequacies within sector management, specifically the DSAC officials responsible for supporting artists. Several participants noted that these officials often lack the relevant skills, sectoral knowledge, and management capacity to provide meaningful assistance to artists navigating the system. As a result, practitioners, especially freelancers and early-career creatives, find themselves at the mercy of an institutional framework that is both ill-prepared and insufficiently resourced to meet their needs. One participant lamented, "You're expected to understand policy and contracts, but no one teaches you, you're just thrown into it" (FG1)

highlighting how bureaucratic systems continue to marginalize those without prior exposure or specialized knowledge.

The cumulative effect of these dual failures, on the part of both educational institutions and sector management, is a creative workforce that feels disempowered, unsupported, and structurally excluded from policy processes such as SEIAS that require administrative fluency. Focus group participants called not only for curriculum reform in higher education but also for improved training and professional development for DSAC officials themselves. Without targeted efforts to enhance institutional capacity alongside artist education, attempts at inclusive and equitable cultural policymaking are unlikely to succeed.

4.3.8 Absence of feedback and follow-up

Perhaps the most pervasive and damaging barrier identified was the perception that consultation was often symbolic rather than substantive. Participants across both focus groups expressed frustration with the lack of meaningful engagement and the absence of feedback following their involvement in consultations. As one participant from the cultural organisations focus group observed, “Sometimes they call us to the table, but they’ve already made up their minds. Our presence becomes symbolic, not impactful” (FG2). A marginalised community participant similarly stated, “It felt like a performance rather than a conversation. We spoke, but did they listen?” (FG1).

Many respondents reported receiving no feedback after their participation in SEIAS-related activities or broader policy consultations. This absence of follow-up communication, such as summaries of discussions, decisions taken, or explanations of how public input influenced the process, left participants feeling ignored and disempowered. For those already facing systemic exclusion, this silence reinforced a perception of being peripheral to decision-making processes. Participants indicated that without clear feedback mechanisms, trust in the process is eroded and incentives for future engagement are significantly diminished.

Several participants called for concrete changes to how feedback is institutionalised within public participation processes. Suggestions included establishing transparent follow-up procedures, issuing public reports summarising stakeholder inputs, and providing targeted communication to participating groups. Without such measures, participatory frameworks like SEIAS risk being seen as compliance-driven exercises rather than meaningful avenues for democratic engagement.

4.4 Colonial legacies, institutional bias, and systemic exploitation

One of the most striking themes to emerge from interviews, focus groups, and expert reflections was the enduring influence of colonial legacies and institutional bias in South Africa’s cultural policy landscape - particularly in relation to the SEIAS and the Revised White Paper. Despite the Revised White Paper’s rhetorical commitment to inclusion and transformation, participants argued that it continued to reproduce entrenched hierarchies by privileging Eurocentric

frameworks of knowledge, artistic value, and cultural governance over local realities (KI3; FG1; FG2). The structure and language of the policy were seen as rooted in discourses that did not resonate with the lived experiences or creative practices of the communities it claimed to serve (KI3; FG2).

A recurrent concern was the marginalisation of Indigenous Knowledge Systems (IKS), which participants felt were either tokenised or insufficiently embedded in the Revised White Paper's core vision (FG1). As one participant remarked, "The barrier is in the foundation of the White Paper itself. It's very colonial... anti-blackness," referring to how black cultural expressions were judged against dominant Western models of legitimacy (FG2). While the Revised White Paper includes references to IKS - such as a commitment to "promote African indigenous knowledge systems and epistemologies as part of national identity" (DAC, 2020: 15) - participants argued that such references were not supported by concrete mechanisms, resources, or institutional commitments. Instead, IKS were often relegated to symbolic or rhetorical inclusion without programmatic detail.

This disconnect was further underscored by the Revised White Paper's emphasis on formalised and institutional cultural expressions, such as museums, orchestras, and archival preservation. These were perceived to be prioritised over community-based, oral, and living traditions. As one participant from FG1 noted, "The money goes to big museums in cities, while people in villages with real stories and art get nothing." KI3 added that classical forms and institutionally sanctioned practices were elevated, while grassroots or popular cultural forms were marginalised. For example, the Revised White Paper's prioritisation of "heritage infrastructure" (DSAC, 2020: 37) was viewed as privileging urban, legacy institutions over informal, rural cultural ecosystems.

Although the Revised White Paper references the need to "recognise and safeguard indigenous heritage and living traditions" (DSAC, 2020: 19), participants described these mentions as "decorative," lacking operational clarity and institutional traction. According to FG2, this amounted to the reproduction of colonial hierarchies under a democratic guise - where black and indigenous knowledge is acknowledged in name but not in practice.

Another major critique was the continued appropriation of cultural expressions from marginalised communities without adequate recognition, remuneration, or representation (FG1). Participants cited examples of state-funded festivals and exhibitions that showcased indigenous or township-based art but failed to compensate artists fairly or include them in curatorial decisions. This dynamic reinforced a broader pattern of cultural extraction: black and indigenous creativity was commodified for institutional gain, while those communities remained excluded from both material benefits and decision-making power. As one artist lamented, "If it's not properly stamped by whiteness, I will always have a problem... I'll be undermined" (FG1).

This systemic exploitation extended beyond symbolic misrecognition to material exclusion. Participants described how cultural labour was extracted while policy processes, funding

mechanisms, and institutional decision-making remained inaccessible. SEIAS, for example, was seen as a technical process that ignored the realities of practitioners outside formal institutions. As one participant observed, “The rules weren’t made for us. They were made to manage us. We need policies that come from our realities, not imposed on us” (FG1). Such experiences contributed to the perception that the RWP was distant and alienating, rather than participatory or empowering.

Institutional gatekeeping was a recurring theme. Participants linked access to recognition, funding, and legitimacy to proximity to established, often white-led institutions. As FG2 noted, black creatives - especially those from rural or working-class backgrounds - were only acknowledged when their work could be reframed to fit dominant aesthetic and institutional priorities. Otherwise, their contributions remained invisible or devalued.

These testimonies revealed how the RWP process was shaped by persistent colonial logics—where whiteness conferred authority, blackness remained conditional, and systemic inequality was maintained through both policy design and implementation. The intersection of race, class, and geography was central to this exclusion, with rural, low-income, and historically marginalised communities disproportionately affected (FG1).

Ultimately, these reflections illustrate that colonial legacies are not mere historical residues; they are active forces shaping cultural policy today. Without an explicit commitment to decolonising both policy content and process - especially within mechanisms like SEIAS - cultural policy risks reinforcing the very inequities it claims to address. Meaningful transformation, participants argued, requires more than consultative exercises. It demands a structural reconfiguration of whose voices, knowledge, and cultural labour are valued in South Africa’s cultural policy landscape (FG2).

4.5 Strategies for inclusive cultural policy engagement

While the Revised White Paper, NPDF, and SEIAS Guidelines all emphasise principles of inclusion, transparency, and responsiveness in cultural policymaking, many stakeholders described a persistent gap between these ideals and their actual experiences. In interviews and focus group discussions, participants, particularly those from rural, under-resourced, and historically marginalised communities, voiced concerns about limited access, uneven representation, and unclear communication. These testimonies underscore the challenges faced in translating participatory policy frameworks into meaningful, on-the-ground engagement.

Drawing on their lived experiences, the following strategies were proposed by participants themselves as solutions to close the implementation gap and make policy processes more inclusive, participatory, and responsive.

4.5.1 Redistributing decision-making: Localising leadership and power

Another consistent theme was the top-down nature of cultural policy processes. Although the Revised White Paper articulates a vision of empowered community involvement (DAC, 2020), participants noted that in practice, decision-making remains concentrated within national departments and formal institutional hierarchies, with limited input from grassroots actors.

This over-reliance on centralised authority and rigid bureaucratic procedures was seen to hinder timely engagement, responsiveness, and local relevance. One rural artist reflected, "Leadership in policy processes should not be about rank, but about listening" (FG1). True participation, they argued, must be embedded from the start, not as an afterthought once policies are already drafted.

This aligns with the SEIAS Guidelines (2024), which stress the need for participatory planning at every policy stage. Decentralisation, in this context, is not merely a matter of administrative efficiency, it represents a deeper cultural and institutional shift toward validating local knowledge, empowering regional leadership, and enabling communities to co-create policy priorities. Without this shift, engagement risks remaining symbolic, and decision-making will continue to reflect elite or metropolitan perspectives.

4.5.2 Sustained and iterative engagement

The Revised White Paper and NDPF both call for ongoing, accountable engagement structures. Participants called for long-term partnerships, structured feedback loops, and iterative consultation processes - moving beyond episodic meetings to establish embedded, transparent communication channels. However, participants criticized the tokenistic nature of many consultation processes, describing them as one-off engagements designed more to check boxes than to foster meaningful relationships. One community arts coordinator remarked, "We need platforms that let us stay involved and see how our input is used. It's about building trust over time" (FG2). As one DSAC official acknowledged, "Sustained engagement requires systems, resources, and a genuine willingness to be accountable" (KI2). This ongoing collaboration is critical not just for legitimacy of the process, but for learning and adaptive policy design.

4.5.3 Dismantling barriers to equitable participation

True inclusion requires addressing the full spectrum of participation barriers—not only digital, but also linguistic, logistical, institutional, and economic. Participants identified a range of exclusions: inaccessible venues, overly technical documents, limited transport, and bureaucratic forms that alienate those without formal education.

A visual artist from Limpopo put it plainly, "We're excluded because we can't afford the bus fare to meetings or don't understand the paperwork" (FG2). The Revised White Paper responds to these concerns by calling for the use of plain language, translated materials, and outreach efforts tailored to local contexts.

Recommendations from participants included flexible meeting times, support for travel costs, mobile-based consultation tools, and alternative communication strategies like storytelling or local art-based methods. Without dismantling these structural barriers, participants warned, inclusion will remain aspirational rather than actionable.

4.6 Conclusion

Chapter 4 has illuminated the disconnect between the stated intentions of participatory policy frameworks, particularly SEIAS and the Revised White Paper, and the lived realities of those most affected by them. The chapter reveals that, despite commitments to inclusion on paper, the mechanisms of cultural policymaking, as experienced in the Revised White Paper process, remain constrained by symbolic consultation, institutional exclusion, and colonial legacies that continue to structure access, legitimacy, and decision-making power.

Participants' testimonies laid bare a range of systemic barriers: inaccessible policy language, inadequate communication strategies, bureaucratic gatekeeping, geographic exclusion, and the marginalisation of indigenous knowledge systems. These barriers are not incidental—they are structurally embedded and reflect deeper historical continuities that undermine transformation. The chapter also exposed how consultation processes often functioned more as technocratic rituals than genuine exercises in democratic engagement, eroding trust and reinforcing perceptions of policy as distant, alienating, and extractive.

However, participants did not merely diagnose dysfunction; they also offered a vision for reimagined, inclusive policy engagement. Community voices articulated concrete strategies for transformation, decentralised leadership, hybrid communication models, iterative engagement, and the dismantling of structural barriers. These insights underscore a crucial imperative: that participation must be more than a procedural formality; it must be a political commitment to equity, co-creation, and justice.

CHAPTER 5: ANALYSIS AND DISCUSSION OF FINDINGS

5.1 Introduction

This chapter critically analyses how public participation was structured, experienced, and contested within the SEIAS process during the development of the 2020 Revised White Paper on Arts, Culture and Heritage. Building on the empirical findings presented in Chapter 4, this chapter applies the integrated theoretical framework outlined in Chapter 2 - drawing on participatory governance (Fung & Wright, 2003), deliberative democracy (Habermas, 1984), Arnstein's Ladder of Participation (1969), Gaventa's Power Cube (2004), Fraser's Theory of Participatory Parity (2021), and Thomas's managerial model (1995) - to interrogate the democratic quality and institutional design of the participatory processes under review.

Whereas Chapter 4 offered a descriptive presentation of data gathered from policy documents, stakeholder interviews, and focus group discussions, this chapter moves toward interpretive analysis. It aims to answer the central research question: *How did the SEIAS process incorporate and facilitate public participation in cultural policymaking?* In doing so, the chapter engages with the disjuncture between formal procedural claims of consultation and the lived experiences of stakeholders, particularly those from historically marginalised communities.

The chapter is structured around key themes emerging from the data, including institutional opacity, technocratic bias, the marginalisation of Indigenous Knowledge Systems (IKS), and stakeholder perceptions of exclusion and tokenism. These themes are examined through the lens of power, voice, and recognition to assess whether SEIAS functioned as a transformative participatory tool or as a mechanism of symbolic compliance.

By grounding the discussion in both theoretical and empirical analysis, this chapter demonstrates how bureaucratic norms, structural inequalities, and epistemic hierarchies shaped not only who participated but also whose knowledge was legitimised in the formulation of the Revised White Paper. In doing so, it contributes to broader debates on democratic legitimacy and cultural justice in post-apartheid South African policymaking

5.2 Policy intentions and institutional understandings of SEIAS

This section addresses the question: *How do the SEIAS framework and related policy documents conceptualise public participation, and how were these intentions interpreted and operationalised during the Revised White Paper process?* Drawing on the analytical tools developed in Chapter 2 - particularly Arnstein's (1969) Ladder of Participation, Gaventa's (2004) Power Cube, and Thomas's (1995) Managerial Model - this section interrogates the institutional narratives, normative commitments, and practical constraints that shaped the participatory vision of SEIAS and its implementation.

SEIAS is framed in official guidelines as a participatory mechanism designed to promote inclusive and evidence-based policy formulation (DPME, 2015; The Presidency, 2024). The Presidency (2020) describes SEIAS as a multi-stage process that should enable continuous engagement with stakeholders, prioritise marginalised voices, and create transparent mechanisms for feedback and accountability. Participation, in this framing, is not a singular event but an iterative, co-productive process embedded at each stage of the policy cycle - from agenda setting to implementation and review (DPME, 2015; The Presidency, 2020). These ideals reflect the deliberative democratic principles articulated by Habermas (1984) and operationalised through participatory governance models (Fung & Wright, 2003).

Key informants from government institutions echoed this normative framing, with one policy participant describing SEIAS as “an iterative and participatory model” (KI1) intended to institutionalise public input across policy stages. Similarly, the DSAC project manager pointed to efforts such as provincial consultations and stakeholder mapping as evidence of alignment with SEIAS expectations. On the surface, these perspectives indicate a shared institutional understanding of participation as central to democratic legitimacy and policy responsiveness.

However, when analysed through Gaventa’s (2004) lens of power dynamics and participatory space, it becomes clear that the SEIAS process during the Revised White Paper was not embedded in a genuinely transformative or inclusive model. While the framework created an "invited space" for public input, this space was tightly controlled, technocratically managed, and disconnected from stakeholder influence over policy outcomes. Arnstein's (1969, 2019) typology helps to locate this form of participation at the lower rungs of her ladder, closer to consultation or placation than genuine partnership or delegated power.

This disjuncture between intention and implementation is particularly evident in the testimony of an independent research expert who supported the SEIAS process. He described SEIAS as “implementation-dependent,” stressing that its participatory potential cannot be assumed based on design alone. The absence of built-in mechanisms for feedback, limited institutional capacity, and weak follow-through on stakeholder inputs undermined the process. As Thomas (1995) notes, participatory mechanisms in bureaucratic settings are often mediated by managerial discretion, which determines who is heard, which inputs are prioritised, and what is ultimately adopted. In the case of SEIAS, this discretion appears to have been exercised in ways that limited the scope and impact of stakeholder engagement.

Crucially, the Revised White Paper process did not clearly differentiate between the IIA and the FIA, nor did it communicate how stakeholder inputs were incorporated between these stages. Although the final FIA was made publicly available, there is no indication that the IIA or its feedback process was accessible or visible to external stakeholders. This lack of transparency further undermines the deliberative quality of participation, as stakeholders were unable to trace how their contributions influenced policy revisions - what Fraser (2021) describes as a failure of participatory parity.

The findings suggest that while SEIAS promotes a normative commitment to inclusion, the absence of enforceable accountability structures, feedback loops, and evaluative criteria renders this commitment largely symbolic. As Cornwall (2008) warns, such “invited spaces” often serve to legitimise pre-determined outcomes rather than disrupt existing hierarchies of power or redistribute voice.

In conclusion, the SEIAS process, as applied in the Revised White Paper, reveals a tension between rhetorical inclusion and administrative reality. While official documents and institutional actors promote a vision of deliberative, inclusive governance, the operationalisation of this vision was constrained by institutional logics that prioritised procedural compliance over democratic engagement. As such, SEIAS functioned less as a participatory instrument than as a bureaucratic tool of legitimisation, reinforcing the perception that public input was managed rather than meaningfully integrated.

5.3 Stakeholder experiences of participation in the SEIAS process

This section addresses the sub-research question: *What were the experiences and perspectives of cultural stakeholders regarding their participation in the SEIAS process?* It critically examines how artists, cultural workers, and civil society actors encountered SEIAS during the development of the Revised White Paper, revealing a participatory process that was largely opaque, disempowering, and disconnected from the democratic ideals it claimed to promote. Drawing on Fraser’s (2021) concern with participatory parity, Arnstein’s (1969) typology of citizen power, and Gaventa’s (2004) theory of invited spaces, the data reveal that many stakeholders were engaged through tokenistic or symbolic gestures that fell short of meaningful inclusion or influence.

Rather than experiencing participation as a dialogical or empowering process, many participants expressed confusion, alienation, and scepticism about their role. Most notably, there was a widespread lack of awareness that their engagements formed part of the SEIAS process. This undermined not only the transparency and legitimacy of the policy process but also stakeholders’ ability to make informed contributions and hold institutions accountable. These experiences speak to what Cornwall (2008) terms the "performance" of participation, where engagement is staged to legitimise pre-decided outcomes rather than shape them.

5.3.1 Unknowing participation and lack of transparency

One of the most prominent findings across interviews and focus group discussions was that participants were unaware they were participating in a SEIAS-governed process. As noted in Chapter 4, artists, community organisers, and cultural institutions attended public meetings believing these to be generic consultation sessions without any indication of their connection to SEIAS’s policy impact assessment functions. As a result, the intent and structure of the participatory process were obscured, making it impossible for stakeholders to meaningfully understand or influence policy development.

This constitutes a fundamental breakdown in institutional communication and deliberative transparency. As Gaventa (2006) argues, invited spaces of participation are only meaningful when participants are aware of the scope of their influence, the purpose of their involvement, and the institutional structures within which decisions are made. In this case, even well-engaged stakeholders lacked the knowledge required to navigate or question the process. As one interviewee reflected, they "found out later that what we said was part of SEIAS - but no one ever told us during the meeting" (FG2). This failure to inform suggests not merely a logistical oversight but a deeper institutional design flaw in which communication was used for coordination, not empowerment.

Fraser's (2021) concept of misrecognition is especially useful here. By not recognising stakeholders as equal participants capable of informed deliberation, the SEIAS process undermined the very parity it was intended to promote. Rather than fostering conditions of voice, power, and inclusion, the process reproduced forms of epistemic inequality that rendered participants' contributions invisible or inconsequential. Arnstein's (1969) ladder of participation situates this form of engagement within the rungs of "consultation" or even "placation," where citizens are heard but have no power to ensure their input is reflected in outcomes.

Crucially, the lack of follow-through mechanisms further compounded this experience of exclusion. Participants were neither informed of how their contributions were considered nor given access to any feedback or revisions. This absence of feedback loops - what Thomas (1995) describes as managerial silence - meant that engagement was not iterative, dialogical, or accountable. Instead, it became what one participant described as a "black box": inputs went in, but nothing came back out (FG1).

Substantive participation, as articulated by Tshoose (2015) and Van Belle & Cupido (2013), requires more than mere presence; it demands clarity of purpose, feedback on contributions, and visible influence on policy content. These elements were markedly absent in the SEIAS process. Participants were left unaware of the policy's development timeline, unsure of where their inputs went, and unable to challenge final decisions. The result was a widespread perception that participation was symbolic rather than substantive—a view that echoes Cornwall's (2002) critique of institutionalised participation as often being "designed to be seen to be inclusive, rather than to redistribute power or voice."

Fung's (2006) analysis of participatory design underscores the importance of responsiveness, transparency, and access. When these are missing, participation fails to meet its democratic objectives. In this study, the failure to identify the process as SEIAS-based, explain its significance, or provide structured follow-up reduced participation to a technocratic exercise. Stakeholders were not empowered as co-creators of policy but were instead conscripted into an opaque process over which they had little understanding and even less influence.

In sum, this theme reveals that stakeholder participation in SEIAS was experienced as fragmented, unclear, and devoid of accountability. It reflects a system that valued procedural

inclusion over substantive empowerment, thus reinforcing structural exclusions and undermining democratic legitimacy. These findings raise serious concerns about the transparency and authenticity of SEIAS as a participatory mechanism in the cultural policy space.

5.4 Constraints on meaningful participation in SEIAS

This section responds to the second sub-research question: *Did cultural stakeholders feel they had adequate opportunity to provide input, and that their input shaped the content of the White Paper?* While the SEIAS framework is normatively grounded in inclusive, evidence-based policymaking, the empirical findings suggest that its implementation was marred by significant structural and procedural constraints. These barriers were not only logistical oversights or administrative inefficiencies; they reflected deeper institutional and systemic dynamics that shaped how participation was structured, who was able to engage, and with what degree of influence.

Guided by Habermas's (1984) theory of communicative action, Fraser's (2021) notion of participatory parity, and Gaventa's (2004, 2006) theorisation of power in participatory spaces, this section interrogates how the institutional architecture of SEIAS produced a participatory process that was formally inclusive but functionally exclusive. The analysis identifies two interrelated sub-themes: the first concerns the structural and systematic barriers to engagement and the participation as privilege, but uneven landscapes of influence

5.4.1 Structural and systemic barriers to engagement

The data reveals a convergence of institutional and procedural obstacles that systematically constrained access to the SEIAS process and diluted its participatory promise:

- Administrative and bureaucratic complexity rendered SEIAS inaccessible to many community-based cultural actors. Stakeholders described being overwhelmed by technical documentation and unfamiliar policy procedures, feeling alienated by the bureaucratic tone and format of engagements (FG1; FG2). As attested by the independent research expert, these dynamics privileged technically literate, institutionally connected actors over grassroots voices (KI3).
- Geographic and socio-economic exclusion structured access in tangible ways. Consultation sessions were largely urban-centred, requiring resources for travel or digital connectivity that many rural stakeholders did not possess. Several participants described the process as "urban-focused" or "Johannesburg-centric," suggesting that logistical planning reinforced spatial inequalities in access to policy platforms (FG1; FG2).
- Policy language and technical framing introduced further communicative barriers. SEIAS documents were experienced as dense, opaque, and detached from lived cultural realities. As Habermas (1984) would argue, the dominance of administrative rationality over communicative reason colonised the participatory space, transforming it from a site of deliberation into one of compliance.

- Absence of feedback loops eroded institutional trust. Participants reported that they received no formal updates on how their inputs had shaped policy drafts, nor any rationale for how decisions were taken. This confirmed for many that participation was symbolic rather than responsive, a dynamic that Gaventa (2004) warns transforms engagement into procedural ritual rather than a space for democratic agency.

These barriers reveal that SEIAS, in practice, did not function as an open communicative space as envisioned in its design. Rather, it became a technocratic filter, privileging institutional fluency, proximity to power, and urban access over grounded knowledge and grassroots inclusion. As Fraser (2021) cautions, when the conditions for participatory parity are not structurally embedded, democratic processes risk reproducing the very inequalities they seek to redress.

5.4.2 Participation as privilege, but uneven landscapes of influence

As Cornwall (2002) and Gaventa (2006) observe, participation is never neutral, but it is always shaped by the architecture of the space in which it unfolds. In the case of SEIAS, this architecture was constructed and controlled by the state, with access mediated by existing networks of institutional legitimacy, technical expertise, and resource capacity.

Well-resourced, urban-based stakeholders, such as national cultural institutions, university-affiliated research centres, and professionalised arts organisations, were not only more likely to be invited to participate but also more likely to have their voices reflected in policy drafts (KI3). Conversely, small-scale community-based organisations, informal cultural networks, and rural practitioners were often either excluded or included in tokenistic ways. As one participant reflected, “The room was always full of the same people…we were outsiders to the process” (FG1).

This stratified inclusion had real consequences. It determined whose cultural worldviews were validated, whose policy critiques were taken seriously, and whose experiences shaped the public narrative. The process thus reinforced invited tokenism (Cornwall, 2008), participation that serves to legitimise decisions already taken, rather than redistribute influence. In Fraser’s (2021) terms, the SEIAS process exhibited characteristics of subaltern exclusion: marginalised actors were formally visible but structurally voiceless.

Participation, in this context, became a form of privilege rather than a democratic right, determined not by the value of one’s input but by proximity to institutional norms, dominant discourses, and resource flows. SEIAS did not disrupt these hierarchies; it reproduced them under the guise of consultation. As Gaventa (2004) notes, unless participatory spaces are intentionally designed to dismantle embedded power relations, they will reflect and reinforce those relations.

5.4 3 Synthesis and transition paragraph

Taken together, these two subthemes reveal how SEIAS failed to achieve the participatory ideals enshrined in its policy design. Rather than creating a genuinely inclusive and deliberative space, the process was marked by bureaucratic inaccessibility, weak communication, and unequal access to influence. While participation was formally embedded in SEIAS procedures, it was substantively undermined by institutional architectures that favoured elite actors, sidelined grassroots voices, and obscured the participatory purpose from many stakeholders. This thematic cluster thus shows that constraints on participation were not isolated missteps but symptoms of deeper structural dynamics, where technocratic governance, spatial inequality, and institutional gatekeeping converged to limit democratic potential.

The next section builds on these insights to explore how these constraints were further shaped by historical patterns of exclusion, epistemic injustice, and colonial continuities in cultural policymaking. In doing so, it interrogates not only the form of participation, but the foundational politics of recognition, power, and knowledge that defined whose voices counted, and whose were silenced.

5.5 Structural exclusion in SEIAS

This thematic section responds to the third sub-research question: *Are there barriers to the involvement of marginalised citizens and groups in SEIAS?* Drawing on the theoretical framework established in Chapter 2, it offers a critical interrogation of how SEIAS, despite its procedural openness, reproduced deeper structures of exclusion. The findings reveal how marginalised cultural stakeholders encountered systemic, epistemic, and ideological barriers that undermined the transformative potential of participation and reinforced existing hierarchies within cultural governance.

5.5.1 From invitation to exclusion

Although SEIAS positioned itself as a consultative and inclusive mechanism, many stakeholders, especially black artists, rural practitioners, and informal cultural workers, experienced the process as symbolic or exclusionary. While some were formally invited to participate, their involvement was often superficial, constrained by limited access to information, compressed timelines, and unresponsive structures. As one respondent observed, “We were invited, yes…to tick a box…” (FG1).

This reflects Cornwall’s (2008) critique of institutional theatre and aligns with Arnstein’s (1969) lower rungs of participation, manipulation, therapy, and tokenism, where inclusion serves to legitimise decisions already made. SEIAS thus operated primarily as an invited space (Gaventa, 2004), shaped by state-defined agendas and formats, with little room for contestation or co-creation. In practice, marginalised voices were neither prioritised nor empowered.

5.5.2 Epistemic injustice and the silencing of local knowledge

Beyond access, many respondents reported that their contributions were not taken seriously. Drawing on Fricker's (2008) concept of epistemic injustice, two forms were evident. First, testimonial injustice, where the knowledge of rural or informal artists was systematically devalued within policy forums. Second, hermeneutical injustice, where the dominant policy language lacked the tools to interpret indigenous or community-rooted practices (Fricker, 2008).

Stakeholders spoke of being misrecognised or misunderstood, "They say they want our views, but the language and process are not made for us" (FG2). This finding underscores Fraser's (2021) notion of participatory parity, where inclusion requires not just presence, but the recognition of one's epistemic standpoint as valid and legitimate.

5.5.3 Colonial continuities in postcolonial policy spaces

The exclusions experienced in SEIAS were not isolated; they reflect enduring colonial logics embedded in post-apartheid policymaking. Despite rhetorical shifts, the Revised White Paper process retained technocratic priorities and globalised policy models that privileged market-oriented CCIs over community-rooted cultural expressions.

As Mbembe (2016) and Ndlovu-Gatsheni (2013) caution, institutional continuities in language, valuation, and expertise often sideline black, indigenous, and working-class epistemologies. Informants identified the Revised White Paper's economic framing as reinforcing these hierarchies: "The problem is the White Paper itself... it's very colonial... anti-blackness" (FG1). This marks a departure from the 1996 White Paper's rights-based, participatory ethos (DACST, 1996), which foregrounded cultural democracy and redress, indicating a shift in the 2020 Revised White Paper toward technocratic governance that prioritises economic outcomes over cultural justice and the recognition of historically marginalised knowledge systems (DSAC, 2020).

5.5.4 Disillusionment and the crisis of participatory legitimacy

As these structural exclusions accumulated, they produced widespread disillusionment among stakeholders. Participation was experienced as empty ritual - an exercise in formal validation rather than democratic inclusion. "They speak of transformation, but they still decide for us" (FG1) captured the prevalent frustration.

This aligns with Gaventa's (2004) warning that participation without responsiveness undermines trust and delegitimises governance. Narayan et al.'s (2000) Voices of the Poor echoes this, showing how participatory mechanisms across the Global South often feel extractive and elite-driven. Van Graan (2013) likewise warns that South Africa's cultural policy processes frequently operate without deep, grassroots engagement, reinforcing alienation and institutional scepticism.

5.5.5 Implications for democratic cultural governance

The findings raise critical concerns regarding the democratic legitimacy of cultural policymaking under the SEIAS framework. Rather than redistributing power or recognising plural knowledge systems, SEIAS reified existing institutional hierarchies. Its design and implementation disproportionately favoured formal institutions, urban elites, and technocratic expertise. As highlighted by McConnell (2010), policy instruments shaped by technocratic logic often marginalise alternative epistemologies and local knowledge, especially in sectors - like arts and culture - where informal and community-based practices dominate. In the case of the Revised White Paper (2020), public participation mechanisms were largely mediated through formal structures such as national summits, online submissions, and departmental workshops, privileging actors with access to digital infrastructure, policy fluency, and institutional networks (DSAC, 2019; PMG, 2019; DPME, 2015). Many grassroots stakeholders, including rural cultural practitioners and traditional leaders, reported exclusion from meaningful engagement, citing limited outreach, short consultation timeframes, and inaccessible formats (K13, FG1).

Participation, as experienced by many cultural actors, functioned less as an empowering mechanism and more as a containment strategy - offering symbolic inclusion while preserving institutional authority. Cornwall (2002) critiques such "invited spaces" of participation as inherently constrained by the agendas of those in power, a concern echoed in Gaventa's (2004) analysis of participatory governance, which stresses the need for a redistribution of voice, epistemic authority, and material resources. However, the SEIAS model did not sufficiently disrupt the status quo. Its procedural requirements - such as mandatory Initial and Final Impact Assessments - prioritised departmental compliance over grassroots deliberation (DPME, 2015). As a result, cultural policy development under SEIAS reflected more the administrative rationalities of the state than the lived realities of diverse cultural actors, undermining democratic cultural governance in both form and substance.

5.6 Portfolio Committee oversight as formal accountability

This section addresses the third sub-research question: *Are there barriers to the involvement of marginalised citizens and groups in SEIAS?* - by critically analysing the institutional oversight role of Parliament in the SEIAS process. It draws on the theoretical framework developed in Chapter 2, particularly Fraser's (1990, 2021) concept of weak publics, Gaventa's (2004) typology of participatory spaces, and Birkland's (2016) insights on agenda-setting and accountability in public policy. While earlier sections demonstrated how structural, epistemic, and symbolic barriers shaped stakeholder participation, this section turns attention to legislative oversight mechanisms, using the 5 November 2019 Portfolio Committee (PC) presentation as a case study to examine how formal accountability structures either mitigate or reinforce participatory exclusions.

DSAC delivered a presentation to the PC ostensibly to report on the progress of the Revised White Paper (DSAC, 2019). The presentation outlined the policy's strategic objectives,

described the consultation processes, and detailed timelines for implementation. DSAC asserted that extensive public engagement, including provincial consultations, sectoral submissions, and interdepartmental inputs, had occurred between 2016 and 2018. It also referenced SEIAS as the framework guiding the policy evaluation process, noting that the South African Cultural Observatory (SACO) had been commissioned to undertake the assessment and produce the final report submitted as part of the department's documentation (DSAC, 2019).

On the surface, this presentation aligns with the principles of procedural accountability and conforms to SEIAS requirements. However, a closer analysis reveals critical gaps. Firstly, the presentation did not distinguish between the IIA and the FIA, despite the NPDF and the SEIAS Guidelines mandating both as distinct and publicly accessible phases (DPME, 2015; The Presidency, 2020). Only the FIA was made public in the presentation, suggesting that either the IIA was not conducted or not disclosed - undermining transparency and limiting public scrutiny of how stakeholder input informed the final policy design.

Secondly, the presentation did not indicate whether participants in earlier consultations were ever informed that their contributions were part of the SEIAS process. This omission reinforces findings from this study that stakeholders were unaware of SEIAS as a distinct participatory mechanism. As one participant noted, "We were aware of consultations for the White Paper, but SEIAS? That's completely new to me" (FG2). Such retrospective framing transforms public engagement into a post-hoc legitimising tool rather than an ongoing, dialogical process. Gaventa (2004) characterises such arrangements as invited spaces, constructed by institutional actors to fulfil procedural norms, rather than to enable genuine deliberation or co-creation of policy.

Furthermore, while the PC session functioned as a constitutionally mandated oversight platform, the Parliamentary Monitoring Group (PMG, 2019) records show that MPs focused largely on logistical issues, such as timelines, budgets, and interdepartmental coordination, rather than interrogating the representational and epistemic exclusions embedded in the policy process. There was no evidence that Parliament questioned whether marginalised communities were meaningfully included or whether their inputs altered the policy trajectory. This confirms Fraser's (1990) critique of weak publics, wherein public deliberation is symbolically performed but substantively constrained by bureaucratic imperatives and elite framing.

The performative nature of the PC presentation also exemplifies Birkland's (2016) concern that agenda-setting in public policy often privileges technical rationality and elite consensus over contestation from affected publics. Rather than acting as a counterweight to technocratic drift, the PC session appeared to reproduce institutional silences, validating the department's procedural claims without interrogating how inclusive or responsive the SEIAS process truly was.

In short, this case study of the PC presentation illustrates how oversight mechanisms, while formally democratic, can inadvertently reinforce proceduralism and mask participatory

deficits. The official narrative presented by DSAC reflected a state-centric conception of participation that prioritised compliance over engagement, and visibility over voice. For marginalised stakeholders, this reinforced the perception that public participation was symbolic rather than transformative, consolidating what Gaventa (2004) calls closed spaces masquerading as open engagement.

To strengthen participatory governance, oversight mechanisms like the PC, must move beyond affirming institutional timelines and outputs. It must function as deliberative spaces for accountability, not merely forums for retrospective reporting, but sites where the inclusivity and responsiveness of policy processes are actively interrogated. For example, while the PC raised questions about implementation feasibility, budget constraints, and alignment with the NDP (PMG, 2019), they did not probe how SEIAS consultations were conducted or whether the voices of rural and informal cultural practitioners were meaningfully integrated. As one focus group participant reflected, "We were invited to consultations, but no one told us it was part of SEIAS…" (FG2).

Such gaps call for oversight forums that invite testimony from structurally excluded communities, demand clarity on how public input is used, and scrutinise omissions or procedural shortfalls in instruments like SEIAS. Only then can citizens contest, influence, and co-create policy outcomes in ways that align with Fraser's (1990, 2021) vision of participatory parity and Gaventa's (2006) call for empowered spaces. Without such transformation, legislative forums risk legitimising exclusion in the very name of democratic process.

5.7 Conclusion

This chapter critically analysed the findings of the study through the lens of participatory theory, epistemic justice, and postcolonial critique. The evidence reveals that, despite SEIAS being formally designed as a participatory and evidence-based tool, its application in the Revised White Paper process was shaped by deep-rooted structural, epistemic, and procedural exclusions. Rather than transforming the policy process into an inclusive and deliberative space, SEIAS often reproduced existing hierarchies, privileging technocratic rationality, institutional compliance, and elite actors.

The first set of themes (5.2–5.4) exposed the disconnect between the participatory intent of SEIAS and stakeholders' lived experiences. Drawing on Habermas's (1984) theory of communicative action and Fraser's (2021) concept of participatory parity, the analysis showed how structural barriers, such as administrative inaccessibility, geographic marginalisation, and opaque communication, systematically constrained the ability of rural and marginalised stakeholders to participate meaningfully. Participation, rather than being a right or a democratic practice, became a privilege linked to institutional status and geographic proximity.

The overarching theme on structural exclusion in SEIAS (5.5) deepened this critique by illuminating the ideological and historical underpinnings of these exclusions. Through Fricker's (2007) theory of epistemic injustice and postcolonial critiques by Mbembe (2016)

and Ndlovu-Gatsheni (2013), the findings revealed how indigenous knowledge systems, informal cultural practices, and black lived experience were either marginalised or misrecognised. The Revised White Paper's technocratic framing and alignment with market-oriented paradigms were shown to privilege professionalised and urban-based cultural actors, while rendering grassroots voices peripheral. In this sense, SEIAS functioned less as a mechanism for transformation than as a re-articulation of colonial and neoliberal logics under a post-apartheid policy guise.

The final theme on the PC as a site of procedural oversight (5.5.6) further highlighted how formal democratic institutions may inadvertently reinforce exclusion when accountability is reduced to checking procedural boxes rather than enabling deliberative contestation. The PC meeting, while fulfilling its reporting function, failed to interrogate how stakeholder inputs were used or how SEIAS had been operationalised. This reinforces Fraser's (1990) concept of weak publics and Gaventa's (2004) critique of invited spaces that mask elite control behind the appearance of openness.

Taken together, these findings suggest a crisis of participatory legitimacy in South African cultural policymaking. Participation was visible in form, but hollow in function. While stakeholders were nominally consulted, there were no meaningful mechanisms for influence, feedback, or redress. This challenges dominant narratives that equate consultation with inclusion and suggests the need for a reconceptualization of participatory governance, one that centres epistemic justice (Fricker, 2007), redistributive design (Fraser, 2021), and transformative accountability (Gaventa, 2004).

Ultimately, the study calls into question the capacity of SEIAS, as currently implemented, to democratise policymaking in contexts of deep inequality. Unless the institutional architecture of participation is fundamentally restructured, public engagement will remain symbolic, reinforcing rather than redressing marginalisation. Chapter 6 builds on this critique by offering recommendations for reimagining SEIAS as a truly inclusive and justice-oriented policy tool.

CHAPTER 6: RECOMMENDATIONS AND CONCLUSION

6.1 Introduction

This chapter synthesises the overall conclusions of the study and outlines a set of evidence-based, transformative recommendations aimed at reshaping SEIAS into a more inclusive, responsive, and democratically accountable tool for cultural policymaking.

Participation was widely perceived by informants, particularly those from rural, black, and community-based sectors, as symbolic, extractive, and technocratic. Instead of fostering democratic engagement, SEIAS largely operated as a procedural formality

Despite its normative commitment to inclusive governance, SEIAS did not sufficiently disrupt entrenched structural hierarchies, epistemic marginalisation embedded within post-apartheid policymaking. The informants described the process as opaque, urban-centric, and unresponsive, with limited opportunities to shape the policy agenda. As several participants stated, in addition of being unaware of SEIAS, their involvement amounted to being called to the table after decisions were already made.

These findings expose a disjuncture between the formal mechanisms of participation and their lived realities, echoing Fraser's (1990, 2021) critique of weak publics and participatory parity, as well as Gaventa's (2004) analysis of invited spaces and closed decision-making. In this context, participation risks becoming performative rather than transformative, a checkbox exercise that affirms institutional authority rather than empowering citizens.

To address this participatory deficit, this chapter proposes several interconnected reforms grounded in the theoretical insights of participatory democracy (Habermas, 1984; Cornwall, 2002; Arnstein, 1969), epistemic justice (Fricker, 2007), and postcolonial critique (Mbembe, 2016; Ndlovu-Gatsheni, 2013). These recommendations aim to shift SEIAS beyond proceduralism and toward a genuinely inclusive, co-creative policy infrastructure.

6.2 Key Recommendations

6.2.1 Strengthen the oversight role of the Portfolio Committee

The PC should transition from a retrospective, compliance-focused approach to a proactive model of democratic oversight. This requires parliament to implement evaluative standards for assessing the quality, inclusivity, and epistemic integrity of public participation in SEIAS processes. Reforms could include:

- Mandating DSAC to submit detailed participation audit reports, specifying who was consulted, how inputs were synthesised, and which recommendations were integrated or excluded, with justifications.

- Instituting community-based parliamentary hearings in underrepresented districts, townships, rural areas, and peri-urban creative hubs, to decentralise access to legislative deliberation.
- Embedding deliberative democracy principles by redesigning PC meetings as dialogic spaces where communities, policymakers, and civil society collaboratively interrogate policy assumptions (Fraser, 1990; Gaventa, 2004).

These reforms reimagine oversight as a participatory democratic safeguard rather than a procedural formality.

6.2.2 Legally mandate participation as a democratic right

Public participation must be recognised not merely as an administrative requirement but as a constitutionally protected right within policy development. To achieve this, SEIAS should be:

- Legislatively anchored through an amendment to the dedicated participation legislation, clarifying minimum standards for consultation.
- Equipped with enforceable participation obligations, including penalties for inadequate consultation, non-reporting or exclusion of affected communities.
- Supported by statutory participation guidelines, defining minimum thresholds for inclusivity across linguistic, geographic, economic, and disability-related dimensions.

Codifying participation legally moves South Africa from discretionary consultation to rights-based participatory governance.

6.2.3 Establish independent oversight for SEIAS

To prevent institutional capture and ensure accountability, an independent, multi-stakeholder SEIAS Oversight Council should be established. This body should include representatives from academia, civil society, traditional leadership, labour, and cultural practitioners. Its mandate would include:

- Auditing engagement processes for compliance with statutory participation standards.
- Verifying the integration of public inputs into policy drafts, including reviewing SEIAS submissions before Cabinet approval.
- Recommending revisions where exclusion, bias, or inadequate participation is identified.
- Publishing annual public reports to enhance transparency and strengthen public trust.

Independence ensures SEIAS evolves into a credible mechanism for accountability rather than an internal administrative tool.

6.2.4 Build participatory capacity across sectors

Meaningful participation requires capacity on both sides of the governance relationship. Reform must therefore include:

- Training for policymakers and DSAC officials in inclusive facilitation, participatory ethics, and cultural competency, including how to engage communities experiencing historical marginalisation.
- Developing policy literacy programmes for cultural practitioners, especially those located in informal, rural, and township settings.
- Expanding digital participation access, including data subsidies and mobile consultation tools.
- Embedding participation support units within DSAC and provincial departments to provide ongoing technical assistance to communities.

Strengthening the participatory capabilities of both state and citizens supports long-term democratic deepening (Cornwall, 2008; Gaventa, 2006).

6.2.5 Align cultural policy with economic empowerment

To ensure participation advances material justice, SEIAS evaluations should incorporate equity-focused economic indicators that foreground the livelihoods of cultural workers. This includes:

- Designing inclusive funding models that prioritise informal, rural, youth-led, and black-owned creative enterprises.
- Creating incentives for local procurement and community-based cultural entrepreneurship.
- Integrating creative economy support mechanisms into policy outcome monitoring, ensuring cultural justice is tied to economic inclusion.

These reforms ensure that participatory democracy is not detached from socio-economic realities.

6.2.6 Institutionalise epistemic justice in SEIAS

SEIAS must actively recognise and uplift diverse knowledge systems. To institutionalise epistemic justice, reforms should:

- Mandate the inclusion of indigenous knowledge systems (IKS), oral histories, and community epistemologies as valid evidence within SEIAS assessments.
- Require participatory methods that foreground subaltern voices, including community storytelling, participatory arts-based methods, and dialogic forums.
- Develop tools for documenting and integrating marginalised perspectives into SEIAS reports, ensuring they are not merely heard but accorded epistemic authority.
- Introduce equity audits to detect and address patterns of epistemic exclusion (Fricker, 2007; Ndlovu-Gatsheni, 2013; Mbembe, 2016).

This shifts SEIAS from a technocratic instrument to a mechanism of knowledge democracy.

6.2.7 Decentralise participation and localise engagement

To ensure accessibility, SEIAS must adopt locally grounded and culturally responsive forms of engagement. Recommended reforms include:

- Using community dialogues, imbizos, participatory theatre, and storytelling circles to generate public input rooted in lived experience.
- Deploying mobile consultation units to rural and remote communities.
- Conducting engagements in local languages and formats aligned with cultural practice.
- Leveraging mobile digital platforms for real-time feedback, voice notes, and accessible submissions.

Decentralisation ensures participation is accessible not by privilege, but by deliberate design.

6.2.8 Establish transparent monitoring and feedback mechanisms

Democratic accountability depends on visible feedback loops. To achieve this, DSAC should establish a central public participation transparency portal that:

- Tracks submissions and shows how they were analysed, accepted, or rejected, with clear explanations.
- Publishes SEIAS reports, consultation schedules, and stakeholder maps in accessible formats.
- Enables communities to monitor policy progress, from consultation to implementation.
- Allows civil society to flag gaps or exclusions through public commentary functions.

Transparent monitoring transforms participation from symbolic compliance into a genuine democratic exchange.

6.3 Conclusion

This study has critically examined the aspirations and limitations of the SEIAS as a mechanism for participatory governance in South Africa's cultural policymaking, with specific reference to the development of the 2020 Revised White Paper on Arts, Culture and Heritage. Through qualitative data drawn from diverse stakeholders in the arts, culture, and heritage sector, the research has revealed a persistent and troubling gap between the formal commitments to inclusive participation and the lived experiences of those most affected by cultural policy decisions.

Despite its normative emphasis on transparency, responsiveness, and inclusivity, SEIAS was found to operate in practice through procedural inefficiencies, administrative opacity, and technocratic reasoning. These limitations are not simply operational flaws, they reflect deeper systemic and structural dynamics. Drawing on Habermas's (1984) concept of the colonisation of the lifeworld, the study demonstrated how bureaucratic rationalities often override lived

experience and local knowledge, reducing participation to a symbolic gesture rather than a substantive democratic practice.

As the findings in Chapter 5 underscored, participation under SEIAS frequently took the form of invited spaces (Miraftab, 2004), where state actors set the terms of engagement, limit the scope of influence, and centralise decision-making within formal institutional boundaries. For many rural, community-based, and historically marginalised cultural actors, this led to experiences of tokenism and performative inclusion, aptly captured by Cornwall's (2008) notion of institutional theatre. These invited spaces legitimised predetermined policy decisions rather than enabling co-creation or contestation.

The study further illuminated the persistence of epistemic injustice within the policy process, where indigenous knowledge systems, oral traditions, and community-rooted cultural practices were misrecognised or excluded. Drawing on Fricker (2007), Ndlovu-Gatsheni (2013), and Mbembe (2016), the research highlighted how SEIAS, despite its inclusive rhetoric, reproduces colonial hierarchies of knowledge and authority. Its technocratic orientation privileges professionalised expertise and market-aligned metrics, effectively sidelining the cultural intelligences of those whose lives cultural policy seeks to shape.

In light of these findings, the study argues for a fundamental reimagining of SEIAS, not merely as an administrative requirement, but as a democratic platform for co-decision-making, mutual accountability, and epistemic justice. The integrated recommendations presented in Chapter 6, ranging from legally mandating participation and establishing independent oversight, to decentralising engagement and building long-term participatory capacity, are intended to transform SEIAS into a living, participatory infrastructure rooted in democratic legitimacy and cultural equity.

Although anchored in the cultural policy domain, the implications of this research extend well beyond the arts and heritage sector. The challenges identified, symbolic consultation, technocratic formalism, epistemic exclusion, and structural inequality, are not unique to SEIAS. They reflect broader tensions within participatory governance frameworks in South Africa and other postcolonial contexts. As such, this study contributes to a wider body of theory and practice aimed at democratising public policy from below, by centring marginalised voices, recognising diverse epistemologies, and transforming institutional cultures.

Ultimately, the success of participatory governance, whether through SEIAS or any other mechanism, should not be judged by the number of consultations conducted, but by the degree to which those consultations redistribute power, shape decisions, and enable collective ownership of public policy. Participation must move from the margins to the centre of policymaking. It must empower communities not only to speak, but to influence; not merely to be consulted, but to co-author the policies that govern their cultural lives and social futures. Only through such transformation can South Africa's policymaking processes fulfil the constitutional promise of dignity, equality, and meaningful public involvement in shaping a just and inclusive society.

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8 Annexure A: Interview and focus group questions

INTERVIEW QUESTIONS

Interview questions: Policy analyist involved in SEIAS processes with DSAC

What role does your involvement with SEIAS play in guiding the implementation of SEIAS within policy-making processes, particularly in the context of the revised White Paper on Arts, Culture and Heritage?

In your view, how well does the Socio-Economic Impact Assessment System (SEIAS) framework incorporate public participation

What mechanisms are in place to facilitate participation in the SEIAS process of the Revised White Paper?

What challenges or barriers have you observed that might prevent marginalized citizens or groups from fully participating in the SEIAS process?

Can you speak to any instances where SEIAS influenced or changed the direction of policy development in the revised White Paper of Arts, Culture and Heritage?

Are there any specific strategies or tools used to overcome barriers to public participation in SEIAS?

Interview questions: Department of Sport, Arts and Culture (DSAC) project manager

What role did the DSAC play in the implementation of SEIAS for the revised White Paper on Arts, Culture, and Heritage, and how did it ensure that public participation was integrated into this process?

What mechanisms were in place to facilitate public participation in the SEIAS process of the White Paper on Arts, Culture, and Heritage?

How does SEIAS facilitate the inclusion of cultural stakeholders, and what impact has this had on the final content of the revised White Paper?

From your experience, what aspects of the SEIAS process were most effective in fostering public engagement? What areas need further improvement?

What were the main challenges faced by DSAC in applying SEIAS to the policy-making process, particularly regarding engaging marginalized groups in the arts, culture, and heritage sector?

Are there any barriers within the DSAC that hinder the effective implementation of public participation as prescribed by SEIAS? How were these addressed for the White Paper process?

Interview questions: Research independent expert

In your view, how effectively does SEIAS contribute to meaningful public participation in policy development, particularly in the context of the arts, culture, and heritage sector?

What are some of the key barriers to public participation that have been identified in SEIAS literature, and have these manifested in the implementation of the revised White Paper on Arts, Culture, and Heritage?

Based on your research and experience, how can SEIAS be improved to ensure more inclusive and effective public participation, particularly from marginalized and vulnerable groups?

What role do you see for SEIAS in promoting social cohesion, economic inclusion, and sustainability within South Africa's arts, culture, and heritage policy-making?

In your opinion, does SEIAS align with constitutional mandates for public participation and democratic governance, or are there areas where the framework falls short?

FOCUS GROUP QUESTIONS

Focus Group 1: Cultural practitioners from marginalized groups

What was your experience of participating in the SEIAS process for the revised White Paper on Arts, Culture, and Heritage? Was the public participation process inclusive and effective in addressing your concerns?

What processes and mechanisms were put in place to facilitate your participation and what kind of processes were you involved in?

Did you encounter any barriers to participation in the SEIAS process? If so, what changes do you think are necessary to overcome these challenges?

Do you think the SEIAS framework sufficiently addresses issues related to social equity and the inclusion of marginalized voices in cultural policymaking?

Did you feel that your input was taken into account during the SEAIS process and the revised White Paper

In your opinion how do you believe SEIAS could be improved to better engage marginalized communities in the arts, culture, and heritage sector?

Focus Group 2: Cultural organization members

What was your experience of participating in the SEIAS process for the revised White Paper on Arts, Culture, and Heritage? Was the public participation process inclusive and effective in addressing your concerns?

What processes and mechanisms were put in place to facilitate your participation and what kind of processes were you involved in?

Did you encounter any barriers to participation in the SEIAS process? If so, what changes do you think are necessary to overcome these challenges?

Do you think the SEIAS framework sufficiently addresses issues related to social equity and the inclusion of marginalized voices in cultural policymaking?

Did you feel that your input was taken into account during the SEAIS process and the revised White Paper

In your opinion how do you believe SEIAS could be improved to better engage marginalized communities in the arts, culture, and heritage sector?