

# POLICY BRIEF

## Managing Memory or Confronting the Past? A Response to South Africa's Draft National Policy Framework for Heritage Memorialisation

### EXECUTIVE SUMMARY

The South African government has released a Draft National Policy Framework for Heritage Memorialisation intended to guide how heritage and memory practices are governed nationally. This framework emerged after nearly three decades of fragmented post-apartheid memorial initiatives and growing contestation over monuments, restitution processes and archives. These include the debates sparked by the 2015 #RhodesMustFall movement which revealed deep tensions in South Africa's post-1994 approach to public memory. While the Framework represents a notable attempt to address coordination gaps in South Africa's memory sector, this brief argues that it risks reducing memorialisation to a technocratic exercise centred on infrastructure delivery and social cohesion, rather than engaging with the important political and justice-related dimensions of public memory. This brief therefore calls for a shift in how memory-work is approached in South Africa. It advocates for greater public participation in the design of memorial initiatives and emphasises the need to operationalise "African ways of knowing" in memorial practice. It further stresses the importance of distinguishing between heritage and memorialisation as related but distinct practices, each carrying particular political significance. In addition, the brief argues that restitution should be reframed as part of a broader effort to restore dignity and recognition to communities historically marginalised from the national narrative. Restitution should therefore not be understood only in material terms, but also as part of a wider process of rehumanisation and historical acknowledgement.



## INTRODUCTION

The South African government has developed a Draft National Policy Framework for Heritage Memorialisation intended to guide how the state confronts, curates and institutionalises the country's abusive past within the public memory-scape.<sup>[1]</sup> This policy process follows three decades of fragmented legacy initiatives and emerges in response to intensifying contestation over monuments, statues, restitution initiatives and archives.

Crucially, this process was prompted in part by concerns raised through the 2015 #RhodesMustFall movement and related struggles, which exposed the endurance of colonial and apartheid symbolism in public institutions and spaces. These movements did not merely object to individual statues; they challenged the broader post-1994 settlement on memory. Among other things, objections were raised over choices to preserve relics of South Africa's abusive past as part of a stabilising political logic.

While the Draft Policy Framework is a welcome initiative to address long-standing coordination and sustainability gaps, there are concerns that, in its current format, it will entrench a largely political and bureaucratic approach to memory. Concerns have been raised that it privileges state-sanctioned narratives, infrastructure delivery and administrative coherence over giving voice to multiple, entangled memories. As with earlier post-apartheid interventions, memorialisation is positioned as a tool of social cohesion and nation-building, without sufficient attention to how memory practices can reproduce exclusion and defer accountability.

This Policy Brief argues that South Africa must move beyond a narrow understanding of memorialisation and heritage that links these processes primarily to reconciliation and closure. Instead, it calls for a framework of memory-work that recognises remembrance as an ongoing and contested social process that is critical to the country's democratic future. It further contends that restitution within memorialisation policies must be reframed as "re-humanisation", a process aimed at restoring dignity, agency and recognition to those erased or marginalised by historical injustice. Re-humanisation involves restoring dignity, agency and historical recognition. It goes beyond simplistic approaches to reparations by demanding that policy processes themselves enable affected communities to exercise voice and authorship over their own histories.<sup>[2]</sup> Finally, this policy brief situates South Africa's debates within a broader African context, where many societies have encountered challenges in governing memory in the aftermath of colonialism, authoritarianism or internal conflict. In numerous African societies, complex and layered histories have been shaped by post-colonial political elites who have often used the memory-scape to capture specific national narratives. This reflects the persistence of inherited Eurocentric modes of nationalism and memorialisation.<sup>[3]</sup>



[1] South Africa Department of Sport, Arts and Culture. 2025. Draft National Policy Framework for Heritage Memorialisation. Government Gazette, No. 52724.

[2] Pablo de Greiff, "The Role of Reparations in Transitional Justice" in *The Handbook of Reparations*, ed. Pablo de Greiff (Oxford: Oxford University Press, 2006), pp.1–18.

[3] Michael Rowlands and Ferdinand de Jong, "Reconsidering Heritage and Memory" in *Reclaiming Heritage: Alternative Imaginaries of Memory in West Africa*, eds. Ferdinand De Jong and Michael Rowlands (California: Left Coast Press, 2007), 13.

# BACKGROUND: POST-APARTHEID MEMORIALISATION AND THE LEGACY PROJECT ARCHITECTURE

## Memorialisation Post-Apartheid

Following South Africa's transition in 1994, the country confronted the task of transforming a public memory landscape shaped by nearly four centuries of colonial domination and apartheid rule. In 1992, 97 percent of all declared national monuments in the country were related to the values and experiences of the white minority. The other three percent covered the heritage of all other population groups combined.<sup>[4]</sup> By 2000 the National Monuments Council (NMC) declared approximately 3500 sites or buildings throughout the country as National Monuments, the majority of which were British colonial and Cape Dutch architecture, as well as sites of Afrikaner struggle.<sup>[5]</sup> During this time, memorialisation was closely aligned with the reconciliation project articulated through the 1996-8 Truth and Reconciliation Commission (TRC), which adopted a restorative justice model. This approach was predicated on the idea that maintaining the status quo would support healing and unity.<sup>[6]</sup> However, the Government's assumption that reconciliation required the retention or reinterpretation of colonial and apartheid symbols functioned to protect historically violent representations rather than to confront the injustices they embody. As a result, the discourse of reconciliation became mobilised to manage conflict rather than allow robust engagement with historical harm in South Africa.

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## The National Legacy Project Framework

In response to widespread demands from communities whose histories had been systematically excluded, Cabinet adopted a conceptual framework for National Legacy Projects (NLPs) in 1997/1998. The framework guided the establishment of monuments, museums, memorials, commemorations and symbolic representations, supported by a multi-tier governance structure anchored within the then Department of Arts, Culture, Science and Technology (DACST). Although Cabinet-approved, this framework was never codified into a formal national policy. The National Heritage Resources Act of 1999, however, guides the management of National Legacy Projects.<sup>[7]</sup> Nevertheless, the conceptual framework for National Legacy Projects has continued to inform memorialisation practice for nearly three decades.

## Achievements and structural limitations

The initial post-apartheid memorial strategy enabled the construction of a number of legacy sites that added to the colonial and apartheid visual heritage landscape and acknowledged aspects of the previously marginalised histories.

[4] Sabine Marschall, *Landscape of Memory: Commemorative Monuments, Memorials and Public Statuary in Post-Apartheid South Africa* (Brill, 2009)

[5] Sabine Marschall, *Landscape of Memory: Commemorative Monuments, Memorials and Public Statuary in Post-Apartheid South Africa* (Brill, 2009)

[6] Ereshnee Naidu, "Symbolic Reparations and Reconciliation: Lessons from South Africa" *Buffalo Human Rights Law Review* 19 (2012)

[7] South Africa Department of Sport, Arts and Culture, *Draft National Policy Framework for Heritage Memorialisation*, Government Gazette No. 52724, (2025), pp.17-18.

However, the Department of Sport, Arts and Culture (DSAC)'s own assessment identifies enduring structural limitations of this framework due to:

- an emphasis on large-scale nationalist projects such as Freedom Park;
- limited integration with other forms of memorialisation, including archives and “living” heritage;
- weak articulation of educational, justice-oriented and socio-economic outcomes;
- insufficient planning for post-completion governance and sustainability;
- and the absence of binding criteria to guide selection, prioritisation and evaluation of memorialisation ventures.<sup>[8]</sup>

Legacy projects were largely treated as finite delivery outputs, rather than as components of an ongoing national process of reckoning with the past.

## CONTESTATION, RECONCILIATION, AND THE CRISIS OF SOUTH AFRICA'S MEMORY-SCAPE

South Africa's memory-scape has not undergone meaningful transformation in the post-apartheid era and has instead become increasingly contested. Any assessment of South Africa's heritage and memorialisation framework must therefore confront the foundational political choice made in the 1990s to accommodate rather than decisively transform the inherited colonial and apartheid memory-scape.

This choice was not accidental. It was rooted in a reconciliation paradigm that prioritised political stability, elite compromise and symbolic inclusion over structural rupture. Contested statues and monuments were frequently defended as part of a “shared heritage” with the implicit assumption that reinterpretation or contextualisation would be sufficient to neutralise their symbolic power. In practice, this approach privileged continuity over justice and often placed the emotional burden of reconciliation on those most harmed by the past. The retention of apartheid-era statues thus reflected:

- an elite-driven conception of reconciliation;
- a reluctance to confront white political and economic power;
- and a belief that heritage could be depoliticised through bureaucratic management.

The 2015 #RhodesMustFall movement marked a critical rupture. This movement called for the removal of individual statues such as that of Cecil John Rhodes at the University of Cape Town but it also challenged the epistemic foundations of heritage governance, including:

- who decides what is remembered;
- whose histories are marginalised;
- and how colonial knowledge systems continue to structure public space in South Africa.


However, despite its profound impact on public discourse, RMF did not result in sustained structural reform of heritage and memorial policy. The 2025 Draft National Policy Framework for Heritage Memorialisation thus emerges in this context of unfinished reckoning. While it acknowledges contestation, it risks reproducing the very dynamics RMF sought to disrupt: technocratic management of deeply political questions and memorialisation without transformation.

These debates underscored how memorialisation in South Africa is inherently political. Any national policy framework must therefore be assessed not only in terms of coordination and efficiency but in terms of whose memories are acknowledged and whose voices are marginalised.

## THE POLICY PROBLEM THE DRAFT FRAMEWORK SEEKS TO ADDRESS

The Draft National Policy Framework for Heritage Memorialisation appropriately identifies a central policy problem in South Africa. That is the absence of a coherent national framework to guide legacy and memorialisation work across government.

[8] South Africa Department of Sport, Arts and Culture, Draft National Policy Framework for Heritage Memorialisation. Government Gazette, No. 52724 (2025).



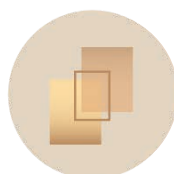
Specifically, it seeks to address:

- • fragmented approaches across DSAC and its entities;
- • weak coordination with provinces and municipalities;
- • inconsistent criteria for project justification and prioritisation;
- • sustainability challenges associated with heritage infrastructure;
- • and limited alignment with the National Development Plan and Government-wide monitoring and evaluation systems.<sup>[9]</sup>

However, the Draft Framework does not sufficiently engage the normative dimensions of memorialisation. In particular, it overlooks its potential relationship to justice and ongoing structural inequality.

## WHAT THE DRAFT POLICY FRAMEWORK PROPOSES

The Draft Framework proposes to:



Establish an approved National Policy Framework for “Heritage Memorialisation”;



Reposition the National Legacy Project as an ongoing government programme, rather than a finite project;



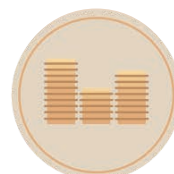
Broaden the scope of memorialisation to include monuments, museums, intangible cultural heritage, archives, libraries, naming practices, national symbols and “repatriation” initiatives;



Align memorialisation with national priorities such as social cohesion, education and economic participation;



Integrate monitoring and evaluation within existing government-wide systems; and



Respond to fiscal constraints by prioritising durable, high-impact, low-maintenance commemorative interventions.<sup>[10]</sup>

These proposals represent a long overdue attempt to rationalise and systematise heritage and memorialisation policy. However, they also open critical questions about the meaning of memory in South Africa.

[9] South Africa Department of Sport, Arts and Culture, Draft National Policy Framework for Heritage Memorialisation. Government Gazette, No. 52724 (2025).

[10] Ibid

## MEMORY, POWER, AND THE LIMITS OF STATE-LED MEMORIALISATION

The Draft Framework consolidates authority over memorialisation and heritage within a state-led policy architecture. While national coordination is both necessary and welcomed, this consolidation risks re-centralising interpretive power over the past at a time when memory remains deeply contested.

State-led memorialisation in South Africa and elsewhere, tends to privilege stability and closure. Yet memory-work, particularly in societies emerging from mass violence, is rarely stable or coherent. Attempts to govern memory through administrative instruments can inadvertently suppress competing narratives, especially those that challenge dominant understandings of reconciliation or expose the limits of symbolic redress.

Across Africa, similar dynamics are evident. Truth commissions, heritage policies and memorial initiatives have often been incorporated into state-building projects, sometimes at the expense of survivor-centred justice. South Africa's Draft Framework therefore has implications beyond its borders: it risks reinforcing a continental trend towards bureaucratised memory regimes that prioritise order over accountability.



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### HERITAGE VERSUS MEMORIALISATION: A FOUNDATIONAL POLICY FAULT LINE

Despite its breadth, the Draft Framework does not clearly distinguish between heritage and memorialisation. Indeed, the very term “heritage memorialisation” is deeply problematic.

Heritage policy is primarily concerned with preservation, management and continuity. Memorialisation, by contrast, is an interpretive, normative and political practice through which societies engage with histories of violence, exclusion and resistance. In South Africa, this distinction is critical. Heritage institutions historically consolidated colonial and apartheid power. Memorialisation, particularly since 1994, has been a site of claims-making by survivors and communities whose experiences were erased or distorted.

When memorialisation is governed primarily through a heritage lens, several risks arise:

- contestation is neutralised in the name of cohesion;
- infrastructure is prioritised over meaning;
- restitution is reduced to symbolic gestures rather than social processes.

This unresolved tension mirrors debates in other contexts, where states have similarly sought to domesticate memory within heritage frameworks.



## RECOMMENDATIONS

It is important that the National Policy Framework for Heritage Memorialisation contributes meaningfully to justice and accountability rather than becoming a purely administrative exercise. This can be achieved through ensuring:

### 1: A clear policy distinction between heritage and memorialisation

“Heritage” and “memorialisation” should be clearly distinguished within the Policy Framework. For the purposes of this Brief, heritage is understood primarily as the preservation and conservation of inherited cultural resources, while memorialisation is understood as an active process of meaning-making in relation to past violence and injustice. The Policy Framework should therefore:

- provide a full description of what constitutes heritage in South Africa;
- provide a complete elucidation of what signifies memorialisation in South Africa; and
- develop separate objectives and evaluation criteria for heritage preservation and memorialisation initiatives.

Without this distinction, memorialisation risks being reduced to infrastructure development and stripped of its reparative and dialogical function.

### 2: Reorienting memorialisation away from reconciliation-as-containment

It is time to move beyond the use of reconciliation as a justificatory framework for retaining symbols of an abusive past. Rather than treating reconciliation as a mechanism for containing contestation or preserving inherited monuments, memorialisation should be reoriented toward critical engagement with historical injustice and the transformation of public space. It is therefore important to:

- acknowledge that reconciliation should not be used to justify the continued presence of apartheid and colonial symbols in public space;
- recognise that such symbols continue to cause harm and exclusion for many communities; and
- ensure that memorialisation initiatives explicitly engage questions of power, injustice and historical responsibility.

This requires abandoning the assumption that reinterpretation alone is sufficient to neutralise the symbolic violence of contested monuments.



### 3: Institutionalising meaningful community authority, not symbolic consultation

Public participation in memorialisation processes must move beyond symbolic consultation. Clear and enforceable standards should be established to ensure that affected and interested communities have meaningful decision-making authority. This could be achieved by:

- clearly defining “community” in a diverse South Africa. (For the purposes of this Brief, the term includes both affected communities, meaning those who directly experienced or were harmed by the histories being memorialised, and broader interest communities who have a legitimate stake in how those histories are interpreted and represented in public space).<sup>[11]</sup>
- specifying minimum requirements for community involvement at all stages (conceptualisation, design, implementation and review);
- granting affected communities decision-making authority, not merely advisory status;
- creating mechanisms for contestation and review where memorialisation proposals are disputed; and
- recognising grassroots and community-led memorial practices as legitimate forms of memorialisation.

Consultation without authority reproduces exclusion and undermines legitimacy.

### 4: Clarifying and operationalising “African ways of knowing” in memorial practice

References to African indigenous knowledge systems should not remain rhetorical. The Policy Framework should specify how these ways of knowing will shape memorial practice in concrete terms. This requires:

- providing a policy-level explanation of what is meant by “African ways of knowing” in memorialisation;
- explicitly recognise oral, performative, ritual, visual, musical and digital forms of memory-making;
- resource practitioners and institutions working in these modes; and
- ensure that memorialisation is not limited to Western monumental forms.

Without this clarity, the Policy risks reproducing Eurocentric memorial forms under an Africanised vocabulary.

### 5: Integrating archives as central sites of memorialisation and restitution

Archives should be reconceptualised not merely as repositories of historical records, but as active and living memorial spaces that shape how the past is interpreted and engaged in the present. Institutional and financial support should therefore be extended to civil society actors who work to unlock the educative potential of archives in processes of public memory. This can be achieved by:

- recognising archives as integral to memorialisation rather than purely technical repositories;
- supporting community-based, activist and alternative archives;
- linking archival work to education and public engagement; and
- addressing the long-standing crisis of access, digitisation and preservation of marginalised histories.

Archival neglect undermines both memorialisation and historical accountability.

[11] The SAHRC has consistently emphasised meaningful public participation, recognising both the centrality of affected communities and the legitimate stake of broader interest groups in rights-based processes across its reporting and advocacy work. See generally South African Human Rights Commission publications, [www.sahrc.org.za](http://www.sahrc.org.za)

## 6: Clarifying sustainability, stewardship and post-completion responsibility

The Policy Framework must provide clear guidance on the long-term governance of memorialisation initiatives. This should address responsibility for oversight and accountability including:

- clear allocation of responsibility for maintenance after project completion;
- realistic budgeting for ongoing stewardship;
- clarity on the roles of provincial and municipal authorities; and
- mechanisms for revisiting and revising memorial sites over time as meanings and contexts change.

“Sustainability” must be understood as social and political, not only financial.

## 7: Reframing restitution as re-humanisation within memorialisation policy

Repatriation and restitution processes should be reframed not only as the return of remains or artefacts, but as part of a broader process of restoring dignity and agency to those harmed by historical injustice. This requires the framework to:

- recognise re-humanisation as a critical process for dealing with South Africa’s colonial and apartheid past;
- define restitution as a broader, ongoing process of social restoration and remembrance; and
- integrate re-humanisation as a broader reparative justice strategy rather than treating it as symbolic closure.

This reframing is essential if restitution is to restore dignity and agency rather than merely mark loss.

## 8: Strengthening accountability, monitoring and civil society oversight

Accountability must be built into the implementation of the Policy Framework. This requires clear monitoring mechanisms, transparent reporting and meaningful space for civil society oversight, including:

- aligning memorialisation initiatives with the government-wide monitoring and evaluation system and the National Evaluation Policy Framework in ways that capture social and justice outcomes not only outputs;
- undergoing regular national evaluations;
- publishing accessible reports on memorialisation projects and funding allocations;
- enabling independent review and civil society monitoring of implementation; and
- ensuring transparency in decision-making, budgeting and project selection.

Without accountability mechanisms, the Policy Framework risks reproducing the failures of earlier legacy initiatives.

## CONCLUSION

The Draft National Policy Framework for Heritage Memorialisation represents an important moment in South Africa's ongoing struggle with its past. However, without sustained civil society and public engagement, it risks becoming another technocratic solution to a profoundly political problem.

The unresolved tensions between reconciliation and justice, preservation and transformation, state authority and community memory remain central. This policy will only succeed if it moves beyond managing memory toward enabling memory-work that is plural and grounded in lived experience.

Civil society therefore has a critical role to play: not only in responding to this Policy Framework, but in shaping the future of how South Africa remembers, repairs and rehumanises.



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AFRICAN TRANSITIONAL JUSTICE RESEARCH COALITION

## References

- [1] South Africa Department of Sport, Arts and Culture. 2025. Draft National Policy Framework for Heritage Memorialisation. Government Gazette, No. 52724.
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