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The Independent Police Investigative Directorate (IPID)
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COMMENTS ON THE INDEPENDENT POLICE INVESTIGATIVE DIRECTORATE REGULATIONS, 2025

Introduction

AgriSA is the largest federation of agricultural organisations in South Africa, representing a broad and diverse membership that includes provincial affiliates, commodity organisations, and individual farmers.

As a trusted voice for the agricultural sector, AgriSA advocates for sustainable farming practices, equitable rural development, and the protection of farmer interests in policy and regulatory processes. Its mission is to ensure that agriculture remains a cornerstone of food security, economic growth and social stability, while safeguarding the rights and safety of farming communities across the country.

AgriSA welcomes the opportunity to provide input on the Draft Regulations issued under the Independent Police Investigative Directorate Act, 2011. While the primary purpose of these regulations is to strengthen accountability and integrity within policing structures, they have important implications for rural communities and the agricultural sector, where the relationship between farmers, farm workers, and law enforcement is both sensitive and vital.

1. Importance of integrity and screening in rural policing

The provisions in Chapter 2 and Chapter 3 relating to pre-employment security screening and appointment of investigators are commendable. AgriSA stresses that rigorous screening must extend to ensuring investigators are familiar with rural contexts, including agricultural crime patterns and the socio-economic realities of farming communities. Without this, integrity checks may be technically sound but practically inadequate.

2. Conduct and relationship with the public

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The Code of Conduct (Chapter 4, Part 1) rightly emphasises impartiality, respect, and accessibility. For farmers and farm workers, confidence in the Directorate depends on investigators being approachable and responsive in remote areas. AgriSA is concerned that without explicit rural accessibility measures, these provisions may remain aspirational. We recommend that the regulations include a requirement for investigators to maintain regular outreach in rural districts, ensuring that agricultural stakeholders are not disadvantaged compared to urban communities.

3. Financial disclosure and conflict of interest

The financial disclosure requirements in Part 2 are essential for transparency. However, AgriSA notes that rural policing often intersects with local economic networks, where investigators may have personal or family ties to farming operations or agribusiness. Clear safeguards must be in place to prevent conflicts of interest in investigations involving agricultural enterprises, particularly where land disputes, water rights, or farm attacks are concerned. AgriSA urges that the Directorate explicitly recognise agricultural contexts as high-risk areas for conflicts of interest.

4. Anti-corruption and ethics management

The designation of ethics officers (Regulation 24) is a positive step. AgriSA recommends that these officers receive specialised training in rural corruption risks, such as manipulation of stock theft investigations, collusion in cross-border smuggling, or misuse of police resources in land-related disputes. Farmers must be assured that corruption within rural policing will be addressed with equal seriousness as corruption in metropolitan areas.

5. Operation of the Directorate

The operational provisions in Chapter 5, particularly those relating to deaths in custody, criminal matters, and securing crime scenes, are critical. In rural settings, crime scenes often involve farms, homesteads, or agricultural facilities. AgriSA emphasises the need for investigators to be trained in handling agricultural crime scenes sensitively, including respecting property rights and minimising disruption to farming operations. Furthermore, timely reporting and referral of complaints must account for the logistical challenges of rural distances and limited communication infrastructure.

6. Integrity testing and confidentiality

AgriSA supports the inclusion of integrity testing (Chapter 6) but cautions that confidentiality provisions must be balanced with transparency to affected communities. Farmers often feel excluded from investigative processes, leading to mistrust. We recommend that the Directorate establish clear communication protocols to keep complainants informed, while safeguarding sensitive information.

7. Disciplinary referrals and internal discipline

The disciplinary framework in Chapter 7 is necessary to ensure accountability. AgriSA highlights that rural communities are particularly vulnerable when investigators act improperly, as alternative oversight mechanisms are limited. It is therefore essential that disciplinary



referrals be processed swiftly and transparently, with outcomes communicated to affected communities where appropriate.

8. Reporting and accessibility

The reporting obligations in Chapter 8 must be designed to ensure accessibility for rural complainants. Farmers and farm workers often face barriers in reporting due to distance, language, or lack of digital access. AgriSA recommends that the Directorate establish rural liaison offices or mobile reporting units to ensure equitable access to investigative services.

Conclusion

AgriSA supports the intent of the Draft Regulations to strengthen integrity, accountability, and professionalism within the Independent Police Investigative Directorate. However, we urge the Minister to ensure that rural realities and agricultural concerns are explicitly addressed in the implementation of these regulations.

Farmers and rural communities face unique vulnerabilities, and their trust in policing institutions depends on investigators who are not only competent and ethical but also accessible, impartial, and sensitive to agricultural contexts.

AgriSA remains committed to constructive engagement with the Department of Police and the Directorate to ensure that these regulations serve all South Africans equitably, including those who live and work in rural areas.



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