



INGONYAMA
TRUST BOARD

STRATEGIC PLAN

2015 - 2020

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GLOSSARY OF TERMS

DRDLR	DEPARTMENT OF RURAL DEVELOPMENT AND LAND REFORM
ITB	INGONYAMA TRUST BOARD
MANCO	MANAGEMENT COMMITTEE
MTSF	MEDIUM TERM STRATEGIC FRAMEWORK
MOU	MEMORANDUM OF UNDERSTANDING
IT	INFORMATION TECHNOLOGY
TC	TRADITIONAL COUNCIL

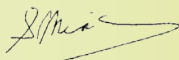
OFFICIAL SIGN-OFF

It is hereby certified that this Strategic Plan:-

- Was developed by the Secretariat and the Board of Ingonyama Trust under the guidance of the Department of Rural Development and Land Reform.
- Was prepared in line with the current Strategic Plan of the Department of Rural Development and Land Reform's Strategic Plan 2015 - 20.
- Accurately reflects the performance targets which Ingonyama Trust Board will endeavor to achieve given the resources made available in the budget for 2015 -2020.

Mr. A Mia
Acting Head of the Secretariat

Signature:




Judge S J Ngwenya
Chairperson of Ingonyama Trust Board

Signature:



Mr. P M Shabane
Director General : Rural Development and Land Reform

Signature:



Approved by:

The Honourable Nkwinti, GE (MP)
Minister of Rural Development and Land Reform

Signature:



PART A

STRATEGIC OVERVIEW



1. MANDATE

The mandate of the Ingonyama Trust Board is derived from sections 25 and 27 of the Constitution. Section 25 (property clause) confirms the framework for the granting of tenure rights on land, and section 27 (health care, food, water and social security clause) confirms the framework for the provision of support to rural communities residing under Ingonyama Trust land.

2. VISION

The vision of the Ingonyama Trust is to become a leader in sustainable communal land management.

3. MISSION

To contribute to the improvement of the quality of life of the members of the traditional communities living on Ingonyama Trust land by ensuring that land management is to their benefit and in accordance with the laws of the land.

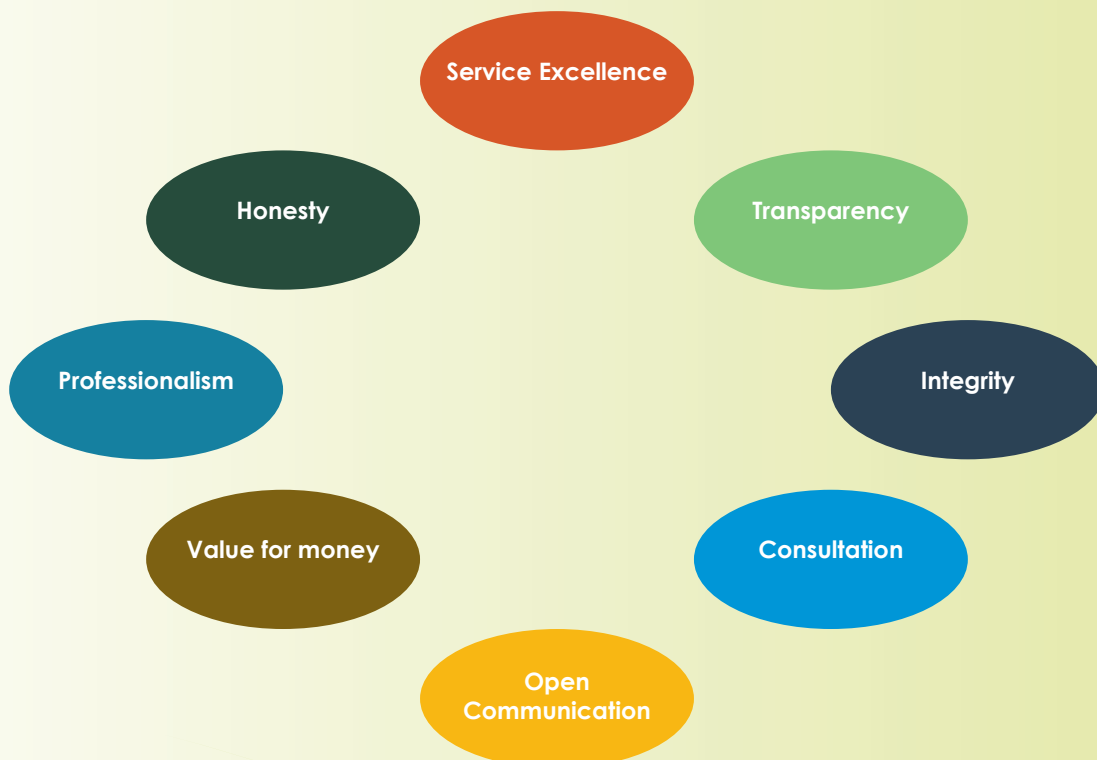
To develop progressive business models for the social and economic upliftment and the empowerment of the members of traditional communities on land administered by the Trust.

4. VALUE STATEMENT

We uphold the following values:

- We value and encourage **diversity** and will not discriminate against anyone.
- As a responsible government department we shall strive to be **transparent, accountable and responsive**.
- We shall ensure that we have a dedicated, loyal, results-oriented, professional and people-focused workforce.
- In collaboration with all stakeholders, the department will **comply with all laws** of this country.

4.1 VALUES



5. LEGISLATIVE AND OTHER MANDATES

5.1. CONSTITUTIONAL MANDATES

Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996)

The mandate of the Ingonyama Trust Board is derived from sections 25 and 27 of the Constitution. Section 25 (property clause) confirms the framework for the granting of tenure rights on land, and section 27 (health care, food, water and social security clause) confirms the framework for the provision of support to rural communities residing under Ingonyama Trust land.

5.2. LEGISLATIVE MANDATES

The Ingonyama Trust Board obtains its legislative mandate as follows:

Ingonyama Trust Act, 1994 (Act No. 3 KZ of 1994) as amended by Act 9 of 1997

The Ingonyama Trust was established in 1994 by the KwaZulu Ingonyama Trust Act, (Act No 3 of 1994) to hold the land in title for "the benefit, material welfare and social well-being of the members of the tribes and communities" living on the land. The Act was subsequently amended by the KwaZulu - Natal Ingonyama Trust Amendment Act No 9 of 1997.

The Ingonyama Trust Act places emphasis on the property clause as per section 25 of the Constitution and gives a stronger mandate for the Board to protect the land and ensure the benefit of communities from the proceeds of the land.

Section 2 (2) of the Ingonyama Trust Act establishes the framework for the administration of the land for the benefit of communities.

Section 2 (5) of the Ingonyama Trust Act establishes the framework in which land rights are to be granted and at the same time protecting trust land.

Ingonyama Trust which is a Body Corporate established in terms of (Sec 2 of the KZN ITB Act kzn of 94) is the registered owner of various pieces of land in KwaZulu Natal which have always historically being part of the land in the Zulu Kingdom dating back to various Zulu Kings. From colonial times this land ownership has been registered either as state land or a state created trust like the SA Development Trust. The Trust was established during the transition period in South African history which leads to the birth of present day democratic government in a constitutional state.

The Trust itself is separate from the Board. The latter is a legal entity created to administer the affairs of the Trust.

- Various National, Provincial and Local Government legislation apply to Ingonyama Trust land;
- The last amendment of the Ingonyama Trust Act was in 1997;
- There is currently an amendment of the act which will substantially change the role of the Board. Among others is to align its role with emphasis on Rural Development;
- The following pieces of legislation are among them.

Conservation of Agricultural Resources Act 43 of 1983	Mineral and Petroleum Royalty Act 28 of 2008
Deeds Registries Act 47 of 1937	National Environmental Management Act 107 of 1998
Environmental Conservation Act 73 of 1989	National Forests Act 84 of 1998
Expropriation Act 63 of 1975	National Veld and Forest Fire Act 101 of 1998
Fencing Act 31 of 1963	National Water Act 36 of 1998
Housing Development Agency Act 23 of 2008	Provision of Certain Land for Settlement Act 126 of 1993
Intergovernmental Relations Framework Act 13 of 2005	Public Finance Management Act 1 of 1999
Interim Protection of Informal Rights Act 31 of 1996	Restitution of Land Rights Act 22 of 1994

KwaZulu-Natal Heritage Act 4 of 2008	Spatial Planning and Land Use Management Act 16 of 2013
KwaZulu-Natal Nature Conservation Management Act 13 of 2005	Traditional Leadership and Governance Framework Act 41 of 2003
KwaZulu-Natal Planning and Development Act 6 of 2008	Upgrading of Land Tenure Rights Act 112 of 1991
KwaZulu-Natal Rationalisation of Planning Laws Act 8 of 2008	World Heritage Convention Act 41 of 1999
KwaZulu-Natal Roads Act 4 of 2001	Subdivision of Agricultural Land Act 70 of 1970
KwaZulu-Natal Traditional Leadership and Governance Act 5 of 2005	Local Government: Municipal Systems Act 32 of 2000
Land Survey Act 8 of 1997	Mineral and Petroleum Resources Development Act 28 of 2002
Local Government: Municipal Property Rates Act 6 of 2004	

The impact of the above-mentioned legislation is noted as an annexure to the Strategic Plan (see annexure A).

5.3. POLICY MANDATES

Land is a national competence in terms of the Constitution therefore all policies of the National government pertaining to land apply to Ingonyama Trust land. Apart from the policies relating to land reform other government policies like environmental affairs, water, and conservation equally apply on Ingonyama Trust land.

It is a well recognised principle of indigenous law that land is indivisible. Therefore the Board as a matter of policy has advanced a practice that beneficiaries of this communal land should opt for a lease as a formal instrument of their right in a communal setup.

The proposed Government policy is a four tier land tenure system namely:

- Private ownership (freehold), state (public ownership), foreign ownership, and communal land;
- Based on this a more detailed policy on Communal Land usage will emerge.

The Board considers the review of the following policies to be critically important for this Strategic Planning cycle.

POLICY	RESPONSIBILITY PLACED ON THE BOARD
Revise disbursement of funds policy	Is to channel funds generated by the Trust back to the Communities residing on Trust land.
Review of Supply chain management policy	Review of the Supply chain policy and asset management policy to bring it in line with current treasury regulations and practice notes.
Review of asset management policy	

5.4. RELEVANT COURT RULINGS

eThekwini Municipality v Ingonyama Trust 2014 (3) SA 240 (CC)

eThekwini Metro brought an application in the KwaZulu-Natal High Court, (Durban High Court)seeking a declaration that the Ingonyama Trust property falling within the jurisdiction of the Municipality is rateable for the period between May 1996 and June 2005.

The Trust opposed the application and contended that the land was state property which was exempted from being rated in terms of the Rating of State Property Act (Rating Act). The High Court found that the property in question was not state property and held that it is therefore rateable.

An appeal by the Trust was brought before the Supreme Court of Appeal. The full bench of the Supreme Court held that the property in question constituted state property which was exempted from rates and

overturned the High Court order.

In the Constitutional Court, the eThekweni Metro sought leave to appeal against the judgment of the Supreme Court of Appeal. eThekweni Metro was unsuccessful in this bid in the Constitutional Court.

The implications of the judgment, as interpreted by Ingonyama Trust Board, are as follows.

- The Ingonyama Trust is an organ of state and is exempted from the payment of municipal rates for the period starting in May 1996 and ending in 01 July 2005, on the basis that the property of the Trust is state property held in trust for the inhabitants in the area of jurisdiction of a local authority. This exemption is in terms of section 3 (3) (a) of the Rating of State Property Act 79 of 1984.
- The Court further found that for the period commencing from 2 July 2005 to 2 July 2011, a municipality could use an existing valuation roll and rating policy, assuming but not deciding that the Local Authorities Ordinance 25 of 1974 (the Ordinance) applied to ITB land. However rates must be levied within the financial year in respect of which they are charged, not retrospectively. The rates must be based on the value of property in each financial year as it appears on the valuation roll and the owner must be given the opportunity to dispute the value placed on the land.
- Should a municipality not have complied with the Local Government: Municipal Property Rates Act 6 of 2004 (the MPRA) after 2 July 2011 by having a new valuation roll and rates policy in place in terms of the MPRA, then such municipality would not have been able to rate any property owner (including the Ingonyama Trust), on the strength of the Ordinance. It should also be noted that the procedures for levying rates in the Ordinance are slightly different from the MPRA.

As a result the impact of this legislation will take many years to assess. Therefore the risk of huge financial exposure on the part of the Board and the Trust as a result of the rates remain a matter of serious concern.

Ingonyama Trust v Radebe and others [2012] 2 All SA 212 (KZP)

The case was decided upon by the Pietermaritzburg High Court and it involved land situated in the Amajuba District and the AmaHlubi Traditional Council. It is relevant upon Ingonyama Trust as it delineates the respective roles of the Traditional Councils and Ingonyama Trust on Ingonyama Trust Land.

The court found that Ingonyama Trust is obliged to exercise any of the incidents of ownership in respect of the trust land connected to a particular recognised tribe or traditional authority with the concurrence of the tribe or Traditional Authority concerned.

The court further found that in respect of the Trust land connected to a particular tribe or Traditional Authority the Act enjoins the Trust to exercise any of the incidents of ownership in respect of such land with the concurrence of the Traditional Authority concerned. Likewise, the traditional authority concerned is not entitled to alienate the trust land without the permission of the Trust. If the land has been alienated by the traditional authority concerned, for such an act to become complete legal, the Trust must have been given permission. This shows that neither the Trust nor the traditional authority concerned has an exclusive right and control of the land connected to a particular recognised traditional authority.

It was held that where the land is not connected to a particular tribe, and not apportioned to any particular tribe or community. Ingonyama Trust enjoys sole and exclusive right to deal with the land registered in its name.

5.5. PLANNED POLICY INITIATIVES

The Ingonyama Trust Board will develop a revenue policy to provide guidance to the Trust on revenue management and compliance with corporate governance matters.

6. SITUATIONAL ANALYSIS

The main drive of Ingonyama Strategic Plan is to implement policies that will respond to the immediate needs of the rural communities residing in Ingonyama Trust land. The Board has therefore developed its 2015-2020 Strategic Plan which is aligned to the Outcome 7 Medium Term Strategic Framework priorities towards the implementation of NDP vision 2030. The Board is contributing to the following priorities of the MTSF:

- Improved land administration and spatial planning for integrated development in rural areas;
- Sustainable land reform (agrarian transformation);
- Improved food security;
- Smallholder farmer development and support (technical, financial, infrastructure) for agrarian transformation;
- Increased access to quality basic infrastructure and services, particularly in education, healthcare and public transport in rural areas; and
- Growth of sustainable rural enterprises and industries characterised by strong rural-urban linkages, increased investment in agro-processing, trade development and access to markets and financial services– resulting in rural job creation.

To improve food security and livelihoods, the Board intends to develop an economic development strategy to incorporate the establishment of rural industries and enterprises. This strategy will promote sustainable relationship between the Board, communities and other stakeholders operating in the same environment.

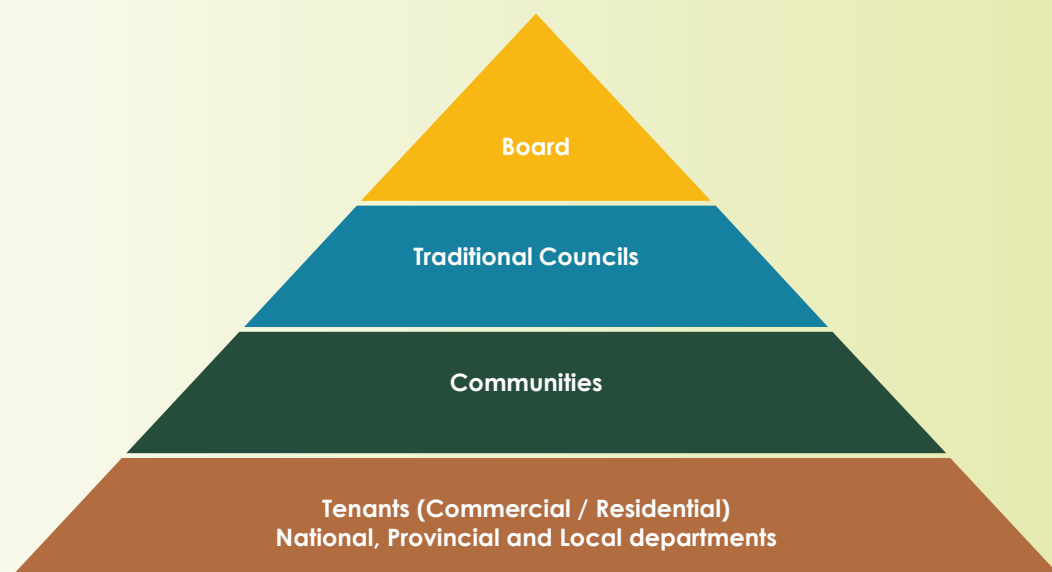
6.1. PERFORMANCE DELIVERY ENVIRONMENT

The Board has exposed 40 traditional councils to skills development and capacity building on land administration, the constitution and other relevant legislations, conflict resolution and conflict management. In the training on the constitution the emphasis is on equity across gender. The Ingonyama Trust has also opened a satellite office in Ulundi where it is currently training traditional councils on the development of memorandum of agreements. In addition, the Board intends opening other offices throughout the ITB areas.

To date the board has approved 2169 land tenure rights. It also intends to improve land tenure information systems by developing spatial information systems on land tenure.

The Board has identified strategically located land to be utilized for high impact commercial ventures such as the opening of Hammarsdale Junction in Mpumalanga Township, a shopping mall under-construction at Mathonsi Traditional Council in Mandeni and the Jozini Mall under Ntsinde Traditional Council in UMkhanyakude which was opened in October 2013. The Board has spent R3-million on community projects that include community gardens, bursaries and procurement of tools of trade for the development of the trust. Furthermore, training workshops were conducted for a number of communities covering aspects of land management and agricultural projects

STRUCTURE OF ITB'S PERFORMANCE ENVIROMENT

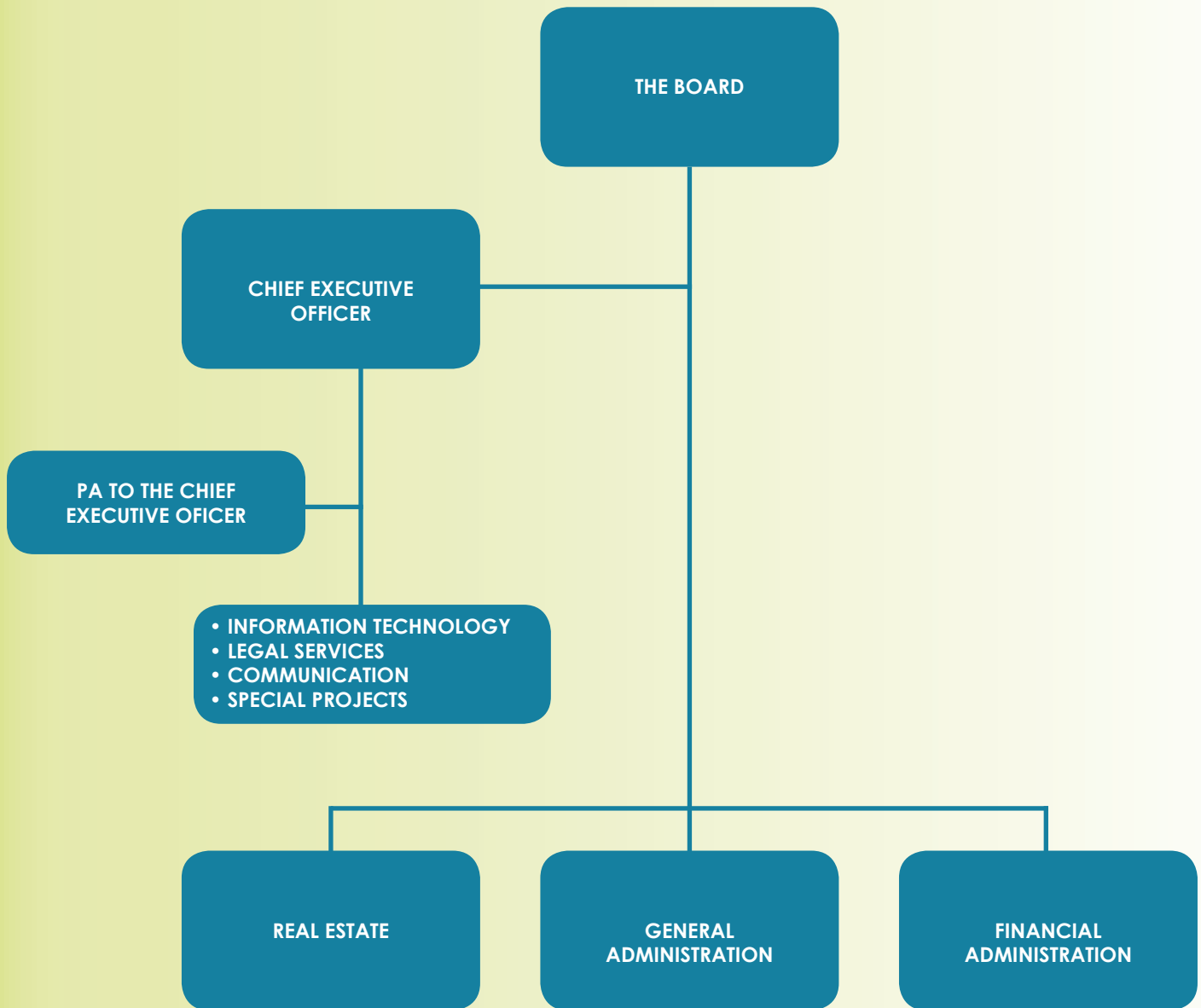


6.2. ORGANIZATIONAL ESTABLISHMENT

As of the 31st of March 2014 the Secretariat had 25 of 27 approved posts in the establishment filled. Additional 30 staff members occupied additional posts to the establishment. In total, the Secretariat has 55 staff members as of 31st of March 2014.

7. ORGANIZATIONAL ENVIRONMENT

Corporate Governance and Organisational Structure



7.1. THE BOARD

The Ingonyama Trust is administered by the Board comprising of nine members including His Majesty the King.

In line with its statutory mandate, the Board is responsible for:

- providing strategic leadership;
- monitoring operational performance of the organisation;
- protecting the Trust's financial position as an Accounting Authority;
- Ensuring that the Trust adheres to high standards of ethics and corporate behavior;
- Reviewing and adopting appropriate risk management plans and policies.

The Board has put in place the following governance structures:

- Internal audit committee;
- Executive committee;
- Tenure committee;
- Bid Adjudication committee.

7.2. THE SECRETARIAT

The Secretariat is the administrative arm of the Board to execute and discharge its mandate. Currently there are 27 approved posts within the establishment. In addition to the approved establishment there are 30 contract positions.

Due to the growing demand of activities on Trust land and the need to achieve long term goals, the Board is reviewing the organogram in an effort to achieve greater operational efficiency of the Secretariat. To this end a satellite office has also been established in Ulundi. This has been done with a view to test the feasibility of establishing future offices in other parts of KwaZulu-Natal.

The Secretariat has three components which are General Administration, Real Estate Management and Finance.

7.3. GENERAL ADMINISTRATION

The General Administration component provides administrative support services to the Board.

The core functions of this component include:

- Supervision of logistical arrangements, registry and reception;
- Provision of human resources function.

7.4. REAL ESTATE MANAGEMENT

The objectives of the Real Estate component are to provide property management, land tenure administration and valuation services to the Board.

The core functions of this component include:

- Processing of tenure rights applications on land;
- Monitoring of illegal occupation of land;
- Maintenance of a land asset register.

7.5. FINANCE

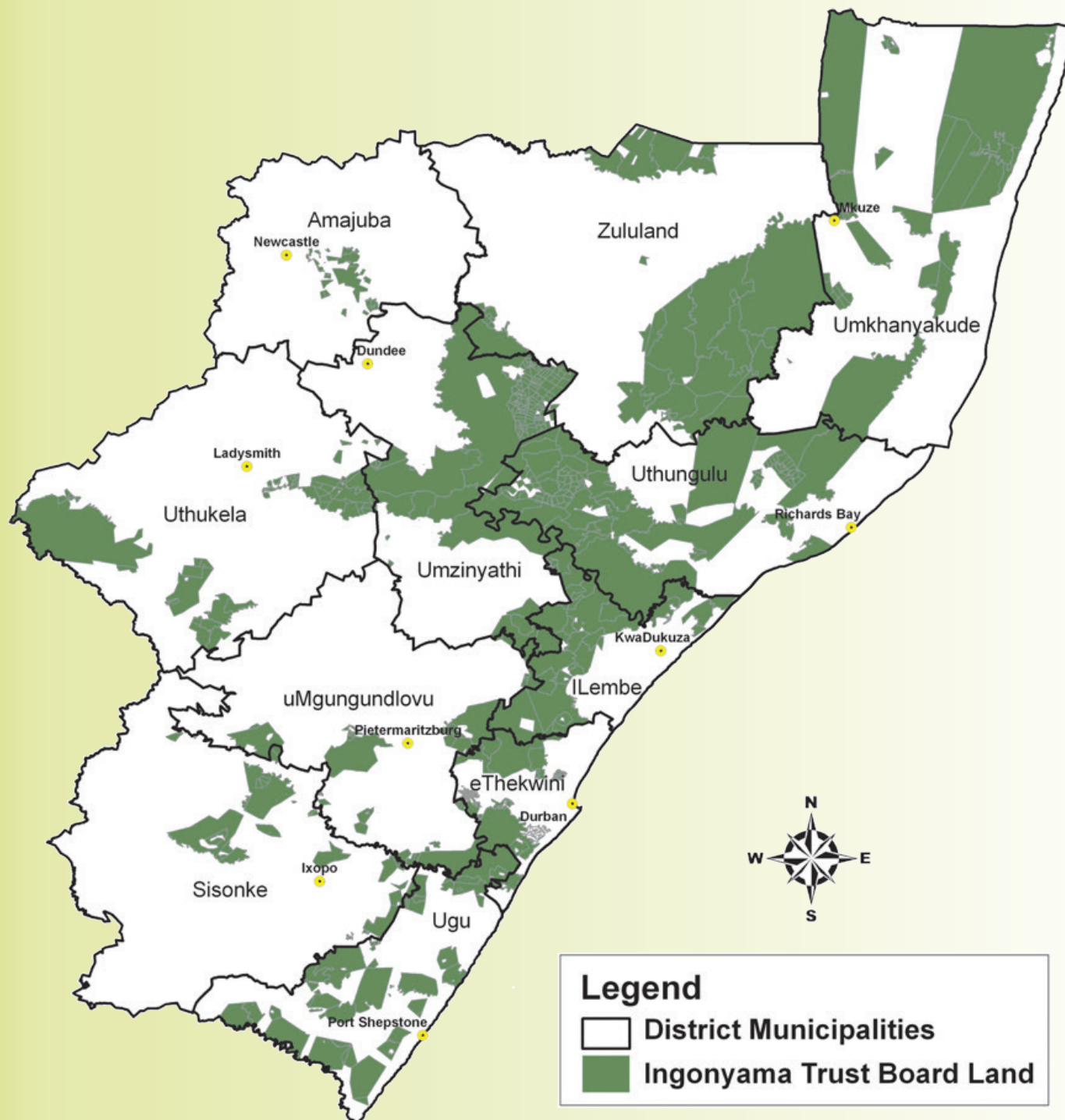
Financial Administration consists of providing financial accounting, budgeting, regulating compliance and risk management services to the Trust.

The core functions of this component include:

- Safeguarding of assets;

- Developing of financial policies and their applications;
- Establishing of internal controls;
- Disbursement of funds to Creditors and beneficiaries.

7.6. MAP OF INGONYAMA TRUST LAND DISCLOSING DISTRICT MUNICIPALITIES



7.7. DESCRIPTION OF THE STRATEGIC PLANNING PROCESS

This process evolved as follows:

- The Secretariat MANCO initiated the process;
- The Department of Rural Development and Land Reform [Chief Directorate Corporate Services] provided guidance and support;
- Workshops were held during which due regard has had to relevant Government policies;
- Finally the Board itself together with its senior staff engaged with the draft Strategic Plan in a two day session, to finalise the Strategic Plan.

INGONYAMA TRUST BOARD STRATEGIC OUTCOME ORIENTED GOAL	
<i>Strategic outcome oriented goal</i>	To administer the affairs of the Trust for the benefit and the material well-being of the communities living on land under Ingonyama Trust Board.

PART B

STRATEGIC OBJECTIVES



PROGRAMME 1 : ADMINISTRATION

Purpose

The purpose of this programme is to provide strategic leadership, corporate services, logistical support services and financial management to the Trust.

Programme Structure

The administration programme comprise of the following:

- Board
- Management
 - Communication
 - Legal Services
 - Information technology (IT)
- General administration
- Financial services

The table below provides the programme's strategic objectives:

Strategic Objective 1.1.	Efficient resource management to ensure effective internal control systems in order to comply with legislative requirements.
Objective statement	To ensure that resources are effectively and efficiently utilised in order to achieve the Ingonyama Trust mandate and improve corporate image.
Baseline	- 90% maintenance of movable asset register completed. - 7 % vacancy rate.. - 12% performance agreements concluded - Server upgrades and implementation of new backup technology completed. - 85% IT compliance in respect of software licensing.
Justification	To ensure that the Board complies with good governance prescripts in its Corporate Services.
Links	Linked to PFMA, Treasury Regulations, Basic Conditions of Employment Act, Labour Relations Act, Asset Management policy on Good Governance.

Strategic Objective 1.2.	Skills development for improved service delivery.
Objective statement	Improve employees' and prospective employees skills to enhance service delivery and optimize customer relations.
Baseline	- 40 training programmes conducted in 2013/14.
Justification	This objective aims to promote a capable and professional workforce to achieve service delivery.
Links	Outcome 7 MTSF, Chapter 13 of NDP.

Strategic Objective 1.3.	To enhance effective customer relationship management
Objective statement	Improve customer service relationships with municipalities and Traditional Councils.
Baseline	-100% invoices paid within 30 days of receipt by finance. -Draft communication strategy.
Justification	This strategic objective will ensure that there is improved relationships with our customers from all sectors.
Links	Outcome 7 MTSF, Batho Pele principles and King III Report on Good Governance.

PROGRAMME 2 : LAND MANAGEMENT

Purpose

The purpose of this programme is to provide a secure tenure right and establish a comprehensive land tenure information system.

Land Management Programme consists of the following:

- Provision of tenure rights;
- Maintenance of Land tenure information system.

Strategic Objective 2.1.	Provision of tenure rights to facilitate development on Ingonyama Trust land. (Security of tenure).
Objective statement	Facilitate development on Ingonyama Trust land through provision of secured tenure rights.
Baseline	-1313 tenure rights approved by the Board.
Justification	- Facilitated development.
	- Concluded tenure right agreements.
Links	Chapter 6 of NDP, Outcome 7 MTSF, DRDLR strategic goal 3.

Strategic Objective 2.2.	An integrated and comprehensive land tenure information administration system.
Objective statement	Ensure an integrated and comprehensive land tenure information administration system.
Baseline	-1 quarterly update of land holdings register in 2014.
Justification	This objective will ensure the safeguarding and ease of access to information for critical decision making.
Links	DRDL Strategic Goal 2, Outcome 7 MTSF.

Strategic Objective 2.3.	Making land available for infrastructure development.
Objective statement	Improve facilitation of development in rural areas by making trust land available.
Baseline	- 20 MOUs concluded with municipalities with regards to rural housing schemes.
	- 2 planning and development co-operation agreements concluded.
Justification	The strategic objective will contribute towards improved rural livelihoods by facilitating the provision of quality infrastructure.
Links	DRDL Strategic Goal 3 and 4. Outcome 7 MTSF.

Strategic Objective 2.4.	Prevention and monitoring of illegal land occupation.
Objective statement	Effective asset management in rural areas.
Baseline	New indicator.
Justification	To safeguard the assets of the trust.
Links	DRDL Strategic Goal 3 ,Outcome 7 MTSF.

PROGRAMME 3: RURAL DEVELOPMENT

Purpose

The purpose of this programme is to co-ordinate, initiate and facilitate the implementation of Rural Development to strengthen security and agricultural productivity.

Rural Development programme focuses on:

- Food Security;
- Facilitate the establishment of industries and rural enterprises.

Strategic Objective 3.1	Support to rural communities to produce their own food in all districts on Ingonyama Trust land.
Objective statement	Provide support to rural communities in all rural districts on Ingonyama Trust land to enable them to improve their livelihoods.
Baseline	New indicator.
Justification	The strategic objective will contribute towards food security in rural areas.
Links	Outcome 7 MTSF, DRDL Strategic Goal 3.

Strategic Objective 3.2	Facilitate the establishment of rural enterprises.
Objective statement	Facilitate the development of rural enterprises in areas with economic development potential and opportunities.
Baseline	New indicator.
Justification	The strategic objective will contribute towards CRDP initiatives.
Links	DRDL Strategic Goal 6.

Strategic Objective 3.3	Strategically located land identified and utilised for agricultural purposes.
Objective statement	Identify land that will be utilized specifically for agricultural purposes.
Baseline	New indicator.
Justification	This strategic objective will ensure that the land allocated for agricultural purposes is used productively and will contribute towards economic development and food security.
Links	DRDL Strategic Goal 3 and 4.

PROGRAMME 4: TRADITIONAL COUNCIL SUPPORT

Purpose

The purpose of this programme is to look into the financial resources of the Trust in advancing economic growth, creating employment and eradication of poverty.

This programme includes the following:

- Provision of training to Traditional Councils;
- Provision of educational awards to community members

Strategic Objective 4.1	Support to Traditional Councils in skills development and capacity building programs provided.
Objective statement	To provide training on land allocation processes as well as providing guidance on dispute resolution (on land matters).
Baseline	43 of TC trainings conducted.
Justification	This objective will contribute to the up skilling of TCs.
Links	DRDL Strategic Goal 1, NDP chapter 6.

Strategic Objective 4.2	Facilitate the provision of socio-economic upliftment opportunities and improve social investment to communities living on Ingonyama Trust land.
Objective statement	To provide socio-economic opportunities to improve sustainable livelihoods of the communities living on the Ingonyama Trust land.
Baseline	1 community needs assessments conducted.
	80 students awarded educational grants.
Justification	Betterment of communities residing on Ingonyama Trust land.
Links	DRDL Strategic Goal 1 and Chapter 9 and 13 of NDP.

RESOURCE CONSIDERATIONS

The Ingonyama Trust Board obtains its funding from the following two sources.

- Transfer payment received from the Department of Rural Development and Land Reform, and
- ITB self – generated funds.
- The compensation of employees has increased since 2010 due to the employment of additional staff. The need for additional staff came about as a result of a rise in the demand for services of the ITB. Spending in the compensation of employees is expected to increase in line with the revision of the organogram.
- The goods and services budget is expected to increase in order to provide sustainable community benefits.
- The trust's capital and infrastructure costs are also expected to increase due to the expansion and decentralisation of office accommodation facilities.
- The Board is committed to sound Human Resource Management. This includes Employment Equity, Employee Wellness, a Service Commitment Charter, and Workplace Skills Development.

RISK MANAGEMENT

Risk management is a systematic approach to setting the best course of action under uncertainty by identifying, assessing, understanding, acting on and communicating risk issues and opportunities, as well as the financing of the consequences of loss.

The trust has implemented and updated its Risk Management Strategy/profile. The trust identified the following categories of risk.

- Financial Risk;
- Physical Security Risk;
- Operational Risk;
- Health and Safety Risk.

The trust has developed mechanisms to mitigate these risks to operate in a safer and secure environment by introducing financial and non-financial policies and compliance procedures.

PART C

LINKS TO OTHER PLANS



1. CONDITIONAL GRANTS

Ingonyama Trust Board does not have any conditional grants; however transfer payments are received from the DRDLR based on a budget approval process.

NAME OF DEPARTMENT	MANDATE	OUTPUTS	CURRENT ANNUAL BUDGET (R'000)	DATE OF NEXT EVALUATION
Department of Rural Development and Land Reform	Support the ITB in terms of the Ingonyama Trust Act, Act 3 of 1994 as amended	Land management and administration support	R 18,069	Annually

2. PUBLIC – PRIVATE PARTNERSHIPS

No Public Private Partnerships exist as defined in terms of the PFMA. However there is an agreement in place to assist with the upgrade of sugarcane production in identified rural areas.

NAME OF ENTITY	MANDATE	OUTPUTS	CURRENT ANNUAL BUDGET	DATE OF NEXT EVALUATION
Tongaat Hullet	Upliftment of the rural communities through the production of sugarcane in traditional areas	<ul style="list-style-type: none"> - Improved production of sugar cane - Capacity building for the traditional communities - Infrastructure development 	Not quantifiable	31 July 2015

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