Filicide in South Africa: The need for legal reform

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Filicide, the intentional killing of a child by a parent or parental figure, presents profound challenges within South Africa (SA)'s justice system. Despite its exceptional nature, filicide is prosecuted under the common-law crime of murder. Although filicide falls within the ambit of common-law murder, the absence of a distinct legal category obscures the unique psychological, relational and socioeconomic factors that differentiate these cases from other homicides. Sentencing practices reveal deep inconsistency, shaped by judicial discretion, the minimum-sentencing regime, and gendered narratives. This article argues that SA should retain filicide within common-law murder but urgently adopt national sentencing guidelines, mandatory pre-sentencing mental health assessments, and integrated prevention pathways linking social services, health systems and law enforcement. Establishing a national filicide database would further strengthen monitoring and policy design. By situating filicide within its broader sociolegal context, this article underscores the need for a co-ordinated, multidisciplinary response capable of preventing tragedy, ensuring consistent, proportionate sentencing, and protecting the country's most vulnerable group.

Keywords: filicide, common-law murder, national sentencing guidelines, policy considerations

S Afr J Bioethics Law 2026;19(1):e4592. https://doi.org/10.7196/SAJBL.2026.v19i1.4592

Filicide, the act of a parent killing their own child, is a deeply unsettling phenomenon that challenges the foundations of law, and societal norms across jurisdictions. Although filicide constitutes a significant proportion of child homicides, there is a notable paucity of scholarly literature addressing this phenomenon, particularly in the African context.

Filicide refers to the intentional killing of a child by a parent or parental figure, which may include biological parents, guardians or step-parents.[1] Within this broader category, specific terms provide conceptual clarity: *neonaticide* denotes the killing of a newborn within the first 24 hours of life, while *infanticide* pertains to the killing of a child under one year of age. Although both men and women are capable of committing filicide, scholarly literature has predominantly focused on maternal perpetrators and cases of neonaticide and infanticide.[2]

In 2023, data from the World Health Organization indicated that there are an estimated 41 000 homicide deaths of children under 15 years of age every year.[3] However, this number underestimates the true extent of the problem, as a significant proportion of deaths due to child maltreatment are incorrectly attributed to falls, burns, drowning and other causes.[3] In addition, the highest rates of homicide among children under five years of age are found in sub-Saharan Africa and North America, whereas Europe and Asia report comparatively lower rates. Interestingly, South Africa (SA) exhibits disproportionately high rates of neonaticide and infanticide. However, the sociocultural and psychological contexts surrounding these cases remain inadequately understood.[1]

In SA, filicide is prosecuted under the common-law crime of murder, with no distinct legal category to address its unique psychological and relational dynamics. Drawing on selected cases, this article argues for a nuanced legal approach that recognises the complexity of filicide and promotes justice for its victims, who are society's most vulnerable. The article outlines the relevant legal framework and highlights contradictions in sentencing practice. It further contends that SA law should continue to prosecute filicide as murder but urgently adopt national sentencing guidelines and mandatory, standardised mental health assessments in all such cases. These measures, grounded in constitutional proportionality and existing procedure, will improve consistency, reduce gender bias, and better integrate child protection and prevention in public health, without fragmenting the law of homicide through new offence categories.

Evidence landscape

Key findings from a national study by the South African Medical Research Council (SAMRC) in 2012 included that child homicide in SA has a distinct gendered pattern, with more girl children murdered at a younger age and an increase in male homicide during adolescence.[4] In addition, nearly half of all child homicides were due to child abuse and neglect. Quarterly data from 2023 and 2024 show that approximately 28 children are violently attacked daily, with three fatalities each day.[5] More recent statistics revealed that during the first three-quarters of the 2024/25 financial year alone, 1 181 children were victims of attempted murder, and over 6 200 were seriously harmed.[6] These statistics highlight a grim reality: the safety of SA's most vulnerable group is in jeopardy, despite the legal protections proffered within our legislative framework. In addition, these statistics point to a deeply concerning trend, exacerbated by systemic failures in child protection and the under-reporting of abuse-related deaths.[7]

One of SA's first documented cases of contractual filicide was the murder of six-month-old Jordan-Leigh Norton. Motivated by jealousy and revenge, Dina Rodrigues hired four men to kill the

child of her romantic partner. She was convicted and sentenced to life imprisonment in 2007.[8] This case remains seminal in legal and criminological literature for its exploration of revenge filicide and the commodification of violence against children. Since then, SA has seen a number of filicide cases, including more recent tragedies that continue to unfold. Table 1 depicts selected cases of filicide that have received media coverage over the past two decades.

An examination of these filicide cases reveals a distressing pattern of diverse and recurring motives, methods and family contexts. Although SA does not maintain a national filicide database, the growing number of reported cases illustrates increasing visibility of this crime and raises urgent concerns about systemic child protection gaps.

Across the cases documented between 2005 and 2025, several recurring causes of filicide emerge clearly.

Revenge and interpersonal conflict

A significant proportion of cases involve parents or caregivers killing children as a means of retaliating against partners or inflicting emotional harm. For example, in 2005, *Dina Rodrigues* orchestrated the contract killing of six-month-old Jordan-Leigh Norton out of jealousy and revenge. In 2019, *Zinhle Maditla* poisoned her four children following a partner dispute. In 2023, *Amber-Lee Hughes*, the stepmother of four-year-old Nada-Jane Challita, killed the child in an act linked to revenge after conflict with her partner.

These cases highlight how adult interpersonal conflicts can be redirected towards children as proxies in relational discord.

Domestic violence and punishment of a partner

Some parental homicides stem from patterns of abusive control or the desire to 'punish' a partner. For example, in 2006, *Marius van der Westhuizen* murdered his three children by shooting, explicitly as punishment of his spouse. This case reflects the entanglement of filicide with intimate partner violence, where children become collateral victims in abusive dynamics.

Mental illness and psychological distress

Mental illness emerges as a critical contributing factor in several cases. Notably, in 2022, *Nomboleko Simayile* killed her four children with a sledgehammer, reportedly driven by delusional beliefs and mental illness. In 2025, a father charged with killing his daughter displayed indicators of possible mental illness, alongside abusive behaviour. These cases suggest an urgent need for mental health screening, intervention, and accessible psychiatric care for at-risk parents.

Abuse, neglect, and chronic family dysfunction

Some cases point to longstanding patterns of physical abuse, neglect, or household instability. For example, in 2025, *Tiffany Meek* was charged with murdering her 11-year-old son Jayden-Lee Meek through blunt-force trauma, with abuse suspected to be an underlying factor. Cases such as this underline the importance of early detection of child abuse warning signs and stronger intervention pathways.

Extreme violence and sexual abuse

A deeply troubling pattern involves filicide accompanied by sexual violence, especially against very young children.

Both the 2023 and 2025 cases (involving *Amber-Lee Hughes* and the father of Nikkita Kiewietse) involved sexual abuse followed by drowning, indicating profound failures in child protection systems and community reporting.

The varying motives in each of these selected cases point to the multifaceted nature of filicide in SA, encompassing revenge, mental illness, neglect and abuse. They further reveal critical gaps in mental health services and child protection systems, and a legal framework that does not respond adequately to the interdisciplinary nature of filicide. Despite the frequency of filicide cases in the country, SA does not maintain a national filicide database, and routine South African Police Service (SAPS) systems do not capture the perpetrator-victim relationship, forcing researchers to reconstruct filicide cases from mortuary records, autopsy reports and police interviews. The absence of a dedicated database limits the country's ability to measure filicide prevalence, identify risk factors, design evidence-based interventions, and prevent future deaths.[15] The Human Sciences Research Council[16] and the SAMRC[4] emphasise that filicide often occurs in contexts involving financial stress, mental illness and domestic violence. A database would enable early identification of families with repeated risk indicators, better use of social worker and healthcare reports, and improved monitoring of children previously reported as vulnerable.[15]

Table 1. Comparative timeline of select filicide cases in South Africa

Year	Victim(s)	Perpetrator	Method	Motive	Legal outcome
2005	6-month-old girl: Jordan-Leigh Norton	Dina Rodrigues	Contract killing	Jealousy, revenge	Life imprisonment[8]
2006	Three children (almost 17-year-old girl with cerebral palsy, 5-year- old boy, and 21- month-old girl)	Marius van der Westhuizen (father)	Shooting	Punishment of spouse	24-year prison sentence[9]
2019	Four children (aged between 11 months and 8 years)	Zinhle Maditla (mother)	Poisoning (rat poison)	Revenge after partner dispute	Four life sentences[10]
2022	Four children (aged between 2 years and 11 years)	Nomboleko Simayile (mother)	Bludgeoning with sledgehammer	Mental illness, delusional beliefs	Mother's death under investigation[11]
2023	4-year-old girl: Nada-Jane Challita	Amber-Lee Hughes (stepmother)	Sexual abuse and drowning	Revenge after partner dispute	Convicted of murder and rape, sentencing postponed to 2026[12]
2025	4-year-old girl: Nikkita Kiewietse	Father (name withheld)	Sexual abuse and drowning	Abuse, possible mental illness	Under investigation[13]
2025	11-year-old boy: Jayden-Lee Meek	Tiffany Meek (mother)	Blunt force trauma	Unknown, possibly abuse	Charged with murder, case ongoing[14]

Legal framework and sentencing practice

Section 28 of the Bill of Rights of the Constitution of the Republic of South Africa, 1996,[17] affirms the fundamental rights of children and in specific places an obligation to provide children with basic nutrition, shelter, basic healthcare services and social services (section 28(1)(c)). Furthermore, under section 28(1)(d) every child has the right to be protected from maltreatment, neglect, abuse or degradation, while section 28(2) provides that the child's best interests are of paramount importance in every matter concerning the child. The Children's Act 38 of 2005[18] gives effect to the rights of children as enshrined under the Constitution and provides for the care, protection and welfare of children. It defines abuse and neglect and outlines the responsibilities of caregivers and state institutions in respect of the child. Furthermore, section 110(1) of the Children's Act dictates mandatory reporting by professionals, including police officials, social workers, teachers and healthcare workers, of any reasonable suspicion of physical abuse, sexual abuse or deliberate neglect of a child. Reports must be made to a designated child protection organisation, the provincial Department of Social Development (DSD), or directly to a police officer. The Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007[19] criminalises sexual offences against children, including incest and exploitation, provides for the establishment of a National Register for Sex Offenders, and provides for specialised sexual offences courts (chapters 3 and 6 of the Act). It further imposes a legal obligation on any person aware of sexual offences against children to report such offences to official authorities, which is particularly relevant in filicide cases where sexual abuse precedes or accompanies the crime, as seen recently with the horrific murder of four-year old Nikkita Kiewietse. Failure to report prior sexual abuse may contribute to escalation and can ultimately lead to death. The Domestic Violence Act 116 of 1998[20] is also relevant as it extends to the protection of children who are exposed to domestic violence. Section 5 of the Act also enables courts to issue protection orders against abusive parents or guardians. Relevant international instruments include the United Nations Convention on the Rights of the Child, 1989,[21] and the African Charter on the Rights and Welfare of the Child, 1999,[22] which reinforce the constitutional mandate to protect children and guide legislative interpretation. Although there are various laws in place to protect children from abuse, statistics provide a bleak outlook, as crimes against children continue to escalate despite these laws. In addition, and as previously mentioned, the motivations behind filicide are varying and wide ranging. Notwithstanding the exceptional nature of filicide, it is prosecuted in the same way as common-law murder, with no distinction in addressing its unique psychological, socioeconomic and relational dynamics.

SA's sentencing framework is rooted in its common-law tradition, granting judges broad discretion to determine appropriate sentences. This discretion is guided by the Zinn triad, which requires consideration of the gravity of the offence, the circumstances of the offender, and public interest.[2] In cases of murder, including filicide, sentencing is further regulated by the Criminal Law Amendment Act 105 of 1997,[23] which prescribes minimum sentences – typically life imprisonment for premeditated murder, unless substantial and compelling circumstances justify deviation. In *S v Malgas*,[24] a 'substantial and compelling circumstance' was found to be any combination of case-specific factors, going beyond ordinary mitigation, that provides truly convincing reasons why the mandatory minimum sentence would be unjust or disproportionate, thereby justifying a lesser sentence. The sentencing framework also allows for consideration of mental illness or diminished criminal responsibility under the Criminal Procedure Act 51 of 1977.[25] If an accused is found to have diminished capacity due to mental illness (e.g. postpartum depression), this may be treated as a mitigating factor during sentencing. However, such defences must be specifically pleaded and proven.[2] Under the Criminal Procedure Act (sections 77 - 79), courts may order a mental health evaluation and can accept postpartum or psychiatric disorders as mitigation; however, this is usually done on a case-by-case basis without guideline-based consistency.[26]

Despite these provisions, the sentencing regime has been widely criticised for:

- Inconsistency in application, especially regarding what constitutes substantial and compelling circumstances
- Gendered biases, where women are judged not only for the crime but also for their deviation from societal expectations of motherhood
- Failure to consider broader socioeconomic and psychological contexts, such as poverty, domestic violence, and lack of support systems.[2]

According to Spies,[2] some examples of these criticisms are highlighted in cases such as *S v Daya*,[27] *S v Matjane*[28] and *S v Labi*,[29] which demonstrate the 'bad mother' narrative that SA courts have applied when imposing sentences. Courts are expected to determine an appropriate sentence by considering all relevant facts of a case, including both aggravating and mitigating factors. In these cases, the degree to which the women violated societal expectations of motherhood was treated as an aggravating factor, although this was not explicitly acknowledged. The language and underlying narrative reveal that these women were judged harshly for failing to protect their children, being portrayed as selfish and indifferent. On the other hand, women perceived as 'mentally ill' are often viewed as victims of their own biology, leading to more lenient sentences focused on treatment rather than punishment. Another category, the 'sad' filicidal woman, includes those without psychiatric diagnoses but whose actions lack cruelty or calculation. In such cases, sentencing tends to be empathetic, considering the woman's personal circumstances and her inability to cope.[2]

The South African Law Reform Commission (SALRC), which is mandated to update and improve the law by addressing gaps, removing inconsistencies, and proposing new legal frameworks where needed, has recommended sentencing reforms including the adoption of sentencing guidelines and a shift away from rigid minimum sentencing laws.[2,30] While these reforms are not specific to filicide *per se*, they include discussions on harms suffered by victims of violent crime and consider compensation mechanisms that could theoretically apply to secondary victims of filicide (for example, surviving siblings or non-offending parents). However, these recommendations have not been implemented, and the current system continues to produce arbitrary, gendered and unpredictable outcomes, particularly in cases involving maternal filicide.

Policy considerations

A coherent national response to filicide requires the development of uniform sentencing guidelines that articulate the substantive factors relevant to judicial decision-making. These guidelines should explicitly identify key contextual considerations including the presence of domestic violence, psychiatric evidence and socioeconomic stressors, and ensure that mental health assessments play a consistent and clearly defined role in evaluating culpability. Also, proper adherence to the adoption of national sentencing guidelines would help to eliminate gender bias and judicial inconsistency,[31] thereby promoting a more principled, rights-aligned approach to sentencing. Filicide is often linked to untreated mental illness. Studies show that perpetrators frequently suffer from depression, psychosis or trauma.[31] Legislative reforms should therefore mandate pre-sentencing mental health assessments and psychological evaluation in all cases of filicide. These assessments should adhere to minimum standards, for example covering diagnostic findings, relevant risk factors, the accused's degree of control at the time of the offence, proposed treatment or rehabilitation pathways, and any implications for child protection systems. Establishing such minimum standards would reduce variability in expert reports and help courts rely on evidence-based psychiatric and psychological insights when determining culpability and appropriate sentencing outcomes.

Beyond sentencing, a collaborative effort is essential to identify risks earlier and prevent harm before it escalates to fatality. This task will require formalised collaboration between the DSD, the Department of Health and the SAPS. Improved mandatory reporting systems, strengthened early-intervention social service mechanisms, and comprehensive training for frontline professionals in trauma-informed practices are critical components of this collaborative effort. As SA faces high rates of child homicide, lacks a dedicated legal or policy approach to filicide, and currently treats these cases under common-law murder, which does not reflect their specific nature, there is a strong justification for the SALRC to undertake a focused investigation into filicide. Such an inquiry would align directly with its constitutional mandate to modernise the law[32] and strengthen protections for children's rights, safety and wellbeing.

Finally, the establishment of a national filicide register is necessary to support research, policy formulation, and long-term monitoring. Such a register should systematically capture key variables, including the relationship between the perpetrator and the child, the broader contextual environment such as a history of abuse or domestic violence, relevant mental health indicators, and sentencing outcomes. Consolidated national data would enable evidence-based interventions, highlight systemic failures, and ultimately contribute to a more coherent and just response to filicide across the country.

Additionally, filicide cases call for sociocultural awareness. Educating communities as a whole about warning signs and available support services can assist in identifying signs of family distress or child endangerment, thereby promoting early intervention and potentially preventing tragedy. Public awareness initiatives are of considerable importance, as they may assist individuals contemplating filicide to disclose their intentions to others beforehand.

Conclusion

Filicide exposes profound fractures in the intersecting systems designed to protect children and support families. The cases examined in this article demonstrate that filicide rarely occurs in isolation; rather, it emerges at the convergence of unresolved domestic violence, untreated mental illness, entrenched socioeconomic stressors, and systemic failures in early detection and intervention. Yet the criminal justice system continues to address these cases through the narrow lens of common-law murder, resulting in inconsistent sentencing and deeply gendered judicial narratives that obscure the structural and psychological drivers of filicide.

To move towards a more just and effective response, SA must strengthen the coherence of its sentencing framework through national guidelines that clearly articulate the relevance of contextual factors and eliminate gendered interpretations of parental behaviour. Mandatory pre-sentencing mental health evaluations, grounded in uniform standards, would ensure that courts have reliable, evidence-based insight into psychiatric and psychosocial contributors to the offence. Prevention must extend beyond the courtroom through sector collaboration, improved reporting mechanisms, and trauma-informed practices across frontline sectors. The establishment of a national filicide register would fill critical data gaps, support evidence-driven policy development, and allow for the identification of high-risk patterns before further harm occurs.

Declaration. None.
Acknowledgements. I would like to thank Dr A V Adeleke for her comments on the initial draft of the article, prior to its extensive revision.
Author contributions. Sole author.
Funding. None.
Conflicts of interest. None.

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Received 8 December 2025; accepted 18 March 2026.