

National Alliance for Street Children
Submission on the Draft Children’s Amendment Bill
Focus: Children living on the Street

Please call on us if you need any additional information in order to make your decisions.

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Note: Words in bold are deletions. Words underlined are insertions.

Clause	Proposed amendment	Discussion/motivation
Amendment of Chapter 1 of Act 38 of 2005		
Section 1	<p>Chapter 1 of the principle Act is hereby amended</p> <p><u>By the omission of the following definition</u></p> <p>1. [“street child” means a child who—</p> <p>(a) because of abuse, neglect, poverty, community upheaval or any other reason, has left his or her home, family or community and lives, begs or works on the streets; or</p> <p>(b) because of inadequate care, begs or works on the streets but returns home at night;]</p>	<p>We recommend removing the definition ‘street child’ from the bill. In the principle Act all references to ‘street child (or street children)’ should be replaced with the phrase ‘child who lives or works on the streets or begs for a living’, as per the definition in section 150.</p> <p>Firstly, the children themselves have said that they do not want to be labelled, that they face discrimination and second grade treatment because of the negative perceptions of ‘street children.’ Children on the streets have the right to equality, fair treatment and not to face discrimination.</p> <p>Secondly, the protection system must respond to the needs of the individual child at any given point in time. The categorisation ‘street child’ masks the needs of the child. A child who begs on the streets because their family is living in poverty, has very different needs to a child who has left home</p>

		because of sexual or physical abuse.
Chapter 1: Interpretation, Objects, Application and Implementation of Act		
Section 1	<p>The definition of a shelter needs to be changed.</p> <p><u>1. “shelter” means a child and youth care centre providing programmes to children living, working or begging on the streets.</u></p>	<p>It was suggested at the DSD workshop on the 9th June 2006, that it would not be possible to incorporate shelters into Chapter 13, because they were referred to frequently in the principle Act.</p> <p>Shelters can be incorporated into Chapter 13, as specialist child and youth care centres, offering dedicated services and programmes for children on the streets. Changing the definition of shelters would facilitate this without the need for changes to the principle Act.</p>
Chapter 7: Protection of Children		
Section 105	<p>Reporting of Children in need of care and protection</p> <p>There are no provisions for the referral of the other categories of children identified as children in need of care and protection to a designated social worker. Some sort of referral system should be incorporated here.</p>	<p>Under the terms of section 105 the obligation to report children in need of care and protection only applies to children who have been “abused in a manner causing physical injury, sexually abused or deliberately neglected”.</p> <p>Children may come in to shelters of their own accord; they may be brought in by a street worker or by the police. All have the right to protection from abuse and neglect and social services. The Bill does not currently provide for realising that right. The question is which state duty bearer is going to put in place an assistance package to that child. How and when does a statutory process start for a child that lives, works on the streets or begs for a living?</p> <p>Some children are in immediate need of statutory protection and there must be an option for staff in shelters to report a child and take out a temporary safe care order immediately. Often when children first come into contact with a shelter they run away, and the flight risk increases if formal proceedings are started immediately. There often needs to be a period of assessment and stabilisation before a formal</p>

		<p>investigation by designated social worker leading to a statutory intervention. Endless investigations are not helpful, the most important thing is to provide assistance, but then who is accountable if no-one helps the child? There must be some obligation to refer all children to a social worker within a given time period.</p>
<p>Chapter 11: Children in Alternative Care</p>		
<p>Section 167</p>	<p>167. A child is in alternative care if the child has been placed— <i>(a)</i> in foster care; <i>(b)</i> in the care of a child and youth care centre following an order of a court in terms of this Act or the Criminal Procedure Act, 1977 (Act No. 51 of 1977); or <i>(c)</i> in temporary safe care <u>following an order of a court in terms of this Act, or following the application of section 152 of this Act.</u></p>	<p>Shelters are included under the definition of “temporary safe care”.¹ It should be clear that this chapter only applies to children who have been placed in shelters on a temporary safe care order pending a children’s court enquiry, or who have been removed to temporary safe care by a designated social worker or a police official in accordance with section 153 of the principle Act. Not all children in shelters are in statutory care.</p> <p>Child may be brought in to a shelter by police officers, outreach workers, or street workers, however, this does not constitute a removal under the terms of 152. This is common practice. Alternatively, a child may come into a shelter voluntarily.</p> <p>There is a first and second phase in sheltering and during the first phase the flight reaction in children, together with drug dependency, needs to be treated as symptomatic of unresolved psychosocial problems faced by the children. One must ensure that the programme fits the children’s special needs rather than forcing the children to fit</p>

¹ 1. “**temporary safe care**”, in relation to a child, means care of a child in an approved child and youth care centre, shelter or private home or any other place, where the child can safely be accommodated pending a decision or court order concerning the placement of the child, but excludes care of a child in a prison or police cell; (definition in section 75 – the Children’s Act)

		<p>programmes developed for children with other needs. There needs to be a period of stabilisation, during which the child is assessed before the child is brought under statutory care. To apply the provisions in Chapter 11 would be impractical for staff and social workers and probably result more children running away.</p>
Section 170	<p><u>(9) This section does not apply to children who voluntarily admit themselves to the child and youth care centre.</u></p>	<p>Organisations want it to be clear that there is a first and second phase in sheltering and that during the first phase the flight reaction in children, together with drug dependency, needs to be treated as symptomatic of unresolved psychosocial problems faced by the children. These children should not be part of the statutory system, and it should be clear that these provisions do not apply to such a child. There must be a duty on staff at shelters to monitor the movement of a child in and out of a shelter and a record should be sent regularly to the social worker in charge of the case.</p> <p>Guidelines should be written defining what is meant by 'absconding'. Regulations that define what happens when a child goes missing need to be drafted.</p>
Section 178	<p>Proposed amendment to departments' sec 178 of 9 June 2006 Death, <u>serious injury or abuse in alternative care</u> 178. (1) If a child in alternative care dies, the [management of the child and youth care centre or person] <u>alternative caregiver</u> in whose care the child has been placed must immediately after the child's death report such death to-</p> <ul style="list-style-type: none"> (a) a police official; (b) the provincial head of social development; (c) the parent or guardian of the child, if he or she can 	<p>On the 09 June 2006 the DSD presented a proposed redraft of this clause at the workshop in Pretoria. These amendments are based on that draft of clause 178</p> <p>There must be an investigation of the deaths of all children in alternative care. The police should conduct an investigation into deaths from unnatural causes. The provincial department of Social Development should conduct an investigation into all other deaths. This section does not cover deaths from natural causes that could have been prevented, therefore neglect will not be picked-up. The</p>

	<p>be traced; [and] (d) the social worker dealing with the matter; <u>and</u> (e) the department of home affairs (where the child is a foreign child).</p> <p>(2) The police official <u>and the provincial department of social development</u> must inquire into the circumstances of the death of such child and, unless such police official <u>or person within the department of social development</u> is satisfied that the child has died of natural causes he/she must cause an investigation into the circumstances surrounding the death of the child to be conducted by the South African Police Service.</p> <p>(3) If a child in alternative care is abused or seriously injured, the manager of the child and youth care or centre or person in whose care the child has been placed must immediately report the matter to the provincial head of social development, who must cause an investigation into the circumstance of the abuse or serious injury to be conducted.</p>	<p>original version of the bill stated that an inquest should follow every death, this was rejected by SAPS. Any concerned individual can request that the NPA hold an inquest, but this is unlikely in facilities where children are being neglected. In order to identify neglect in certain institutions, there must at least be an investigation by Department of Social Development after each death or serious injury.</p> <p>There is concern that some shelters and SAPS officials are colluding and covering up deaths. This is why it was recommended that the department should also be satisfied that the child died of natural causes.</p> <p>Recommend that HOD must investigate all deaths, serious injuries and abuses. We support the requirement on staff and volunteers to report the death of a child in a child and youth care centre immediately.</p>
Chapter 13: Child and Youth Care Centres		
Section 191	<p>Child and Youth Care Centres 191. (1) A child and youth care centre is a facility for the provision of residential care to more than six children outside the child's family environment in accordance with a residential care programme or</p>	<p>Children on the streets are children in need of care and protection and are extremely vulnerable. They are entitled to the same standards of care and protection as other children. It is essential that they are offered therapeutic programmes and services, including education. Chapter 14 also fails to</p>

	<p>programmes suited for the children in the facility, but excludes-</p> <p>(a) a partial care facility [(b) a [shelter or] drop-in centre </p> <p>191 (2) a child and youth care centre must offer a therapeutic <u>and developmental</u> programme designed for the residential care of children outside the family environment, which may include a programme designed for-</p> <p>(a) the reception, care and development of children otherwise than in their family environment;</p> <p><u>(i) the reception and temporary safe care of children who live or work on the streets or beg for a living.</u></p>	<p>make provision for all the prevention and early intervention services provided for children on the streets. To safeguard the rights of children making use of shelters, all the services offered in any other child and youth care centre must be provided for in shelters. This can be achieved by incorporating shelters into chapter 13. Shelters would then become Child and Youth Care Centres offering services to children on the streets, they would benefit from the same funding. There is a duty on the National and Provincial Government to ensure that there is a sufficient number of child and youth care centres offering a range of services. There must be an option to place a child under a temporary safe care order in a shelter.</p> <p>There is a debate as to whether the provisions of 191 cover shelter or whether they should be covered by a separate clause. It is recommended that a separate clause be inserted for children on the streets for the following reasons: Shelters are for children on the streets. Occasionally shelters agree to assist the DSD by taking in other categories of children in need of care and protection overnight or for a few days, usually in crisis situations. This should not be routine. Places of safety are supposed to serve the purpose of temporary stay pending investigation and/or placement. Experience has shown that placement of non-street children in shelters is counterproductive since a shelter stay could result in their taking to the streets. Staff are already stretched and may find it burdensome to take on cases requiring special treatment and who are not children.</p>
Section 209	<p>209 <u>(1) Norms and standards for child and youth care centres must include professional assessment of children, therapeutic and developmental programmes.</u></p> <p><u>(2) Premises used as a shelter must, in addition, have</u></p>	<p>Organisations want it to be clear that there is a first and second phase in sheltering and that during the first phase the flight reaction in children, together with drug dependency, needs to be treated as symptomatic of unresolved</p>

	<p>=</p> <p><u>(a) an outreach programme for children on the streets;</u> <u>(b) prevention and early intervention programmes; and</u> <u>(c) after-care programmes and family and community re-integration programmes.</u></p> <p>(3) The management of a child and youth care centre must take all reasonable steps to ensure that the centre complies with the norms and standards for child and youth care centres as prescribed.</p>	<p>psychosocial problems faced by the children. Child and youth care workers in shelters should carry out an initial assessment of children before referring the child to a designated social worker for the investigation contemplated in section 155(2).</p> <p>Programmes must fit the children's special needs rather than forcing the children to fit programmes developed for children with other needs.</p>
Section 212	<p>212. The Minister may, where appropriate after consultation with the Ministers of Education and of Health, in terms of section 306 make regulations prescribing—</p> <p>(a) the procedure to be followed [and the fees to be paid] in connection with the lodging and consideration of—</p>	<p>Given the fact that NGO's are essentially providing a service which government is responsible for it is unfair that they be required to pay a fee to provide the service</p>
Chapter 14 Shelters and Drop-in Centres		
General	<p>All references to shelter in chapter 14 should be deleted.</p>	<p>All the services offered in any child and youth care centre must be provided in shelters. Children using shelters need to be given the same or similar care and protection as provided in chapter 13. This can be achieved by incorporating shelters under the regulatory umbrella of chapter 13.</p>
Section 213	<p>Delete section 213(1) and amend 213(2): [Shelters and] Drop-in centres 213. [(1) A shelter is a facility located at a specific place which is managed for the purpose of providing basic services, including overnight accommodation and food, to children, including street children, who voluntarily attend the facility but who are free to leave.]</p>	

	<p>[(2)] (1) A drop-in centre is a facility located [at a specific place] in a place accessible to children at risk which is managed for the purpose of providing basic services, excluding overnight accommodation, to children, [including street children], who voluntarily attend the facility [but who are free to leave].</p>	<p>Remove [including street children], Drop-in centres do prevention work with children before they leave home for the streets and early intervention work with children on the streets, it is not necessary to add the words including street children.</p> <p>Remove [but who are free to leave] Children should not be encouraged to come and go as they please they should be encouraged to commit to the developmental and therapeutic programmes offered.</p>
Sections 214	<p>Proposed amendment - Delete current clause [Establishment of shelters and drop-in centres 214. (1) Shelters and drop-in centres established by an organ of state, designated child protection organisation or non-governmental organisation only qualify for funding from money appropriated by a provincial legislature if it complies with the national norms and standards mentioned in subsection (2). (2) The Minister must determine the national norms and standards after consultation with the MECs for Social Development, the Financial and Fiscal Commission and the Minister of Finance.]</p> <p>Insert new clause <u>Establishment of drop-in centres</u> <u>214. (1) The MEC for social development of a province must, from money appropriated by the relevant provincial legislature, must ensure the provision of drop-in centres for that province.</u> <u>(2) Such drop-in centres—</u> <u>(a) must be managed and maintained in accordance with this Act; and</u></p>	<p>Unlike child and youth care centres, drop-in centres are treated unfairly as far as funding is concerned. Chapter 14 does not provide for strategies to ensure sufficient spread of drop in centres and section 214 implies that if the provincial legislature does not appropriate money then there will not be any funds to actually assist drop in centres to function properly.</p> <p>Very often the first service offered to street children in small towns and rural settings is a Drop In Centre. This is often the base from which a comprehensive range of services develops over time. For this reason it is recommended that the Bill must ensure that there is an adequate spread of Drop In Centres in each province. When planning the range of services the MEC must give effect to the objects of the Act and the general principles ensuring that services provided cater for <i>all</i> children. The following groups are in need of special protection: children with disabilities; girls; and foreign children.</p>

	<p><u>(b) must comply with—</u></p> <p><u>(i) the minimum norms and standards for drop-in centres contemplated in section 220; and</u></p> <p><u>(ii) the structural, safety, health and other requirements of the municipality of the area in which the drop-in centre is or is to be situated.</u></p>	
Section 215	Delete all references to shelters	
Section 216	<p>Existing [shelters] drop-in centres</p> <p>216 As from the date on which section 215 takes effect an existing [shelter] drop-in centre registered in terms of the Child Care Act must be regarded as having been registered as a [shelter] drop-in centre in terms of section 215.</p>	Some provinces have registered Drop In Centres, whilst others have not. Therefore those already registered need to be covered by this clause.
Section 217	Delete all references to shelters	
Section 218	<p>Application for registration and renewal of registration</p> <p>218. (1) An application for registration or conditional registration of a [shelter or] drop-in centre or for the renewal of a registration must-</p> <p>(a) be lodged, in accordance with a procedure prescribed by regulation, with the provincial head of social development in which the facility is or will be situated;</p> <p>(b) contain the particulars prescribed by regulation; and</p> <p>(c) be accompanied by –</p> <p>(i) [any documents that may be prescribed by regulation; and] <u>A certified copy of the constitution or founding document of the drop-in centre;</u></p> <p>(ii) [such fee as may be prescribed by regulation] <u>.A certified issue by the municipality in which the drop-in centre is or is to be situated</u></p>	Although the sections on registration are supported it is worrying that section 218 requires a registration fee. Given the fact that NGO's are essentially providing a service which government is responsible for it is unfair that they be required to pay a fee to provide the service.

	<p><u>certifying that the premises in which the centre is or is to be accommodated complies with all structural, safety, health and other requirements of the municipality;</u></p> <p><u>_____ (iii) any documents that may be prescribed by regulation.</u></p>	
<p>Consideration of Application Section 219</p>	<p>Add two subsections</p> <p>219. (5) Management board</p> <p><u>(a) Each drop-in centre must have a management board consisting of no fewer than six and no more than nine members.</u></p> <p><u>(b) The members of a management board are appointed by—</u></p> <p><u>(i) the MEC for social development in the relevant province, in the case of a drop-in centre which is operated by the province; and</u></p> <p><u>(ii) the registration holder in accordance with a procedure prescribed by regulation, in the case of a privately operated drop-in centre.</u></p> <p><u>(c) In appointing members of the management board, equitable representation by all stakeholders, including the community in which the drop-in centre is located, must be ensured.</u></p> <p><u>(d) No person unsuitable to work with children may be appointed or continue to serve as a member of a management board.</u></p> <p>(6) Manager and staff of drop-in centre</p> <p><u>(a) The person or organisation operating a drop-in centre must appoint or designate—</u></p> <p><u>(i) a person as the manager of the centre;</u></p>	<p>Drop In Centres also require a Management Board.</p> <p>Staff and managers must be adequately trained and the staff-to-children ratios must be sufficient to provide protection to children whilst attending the centre. In particular, staff should have basic first aid training.</p>

	<p><u>and</u> <u>(ii) a sufficient number of staff or other appropriate persons to assist in operating the centre.</u></p> <p><u>(b) A person may be appointed or designated in terms of subsection (1) only after following an interview process prescribed by regulation.</u></p> <p><u>(c) No person unsuitable to work with children may be appointed or designated in terms of subsection (1) or continue to serve at a drop-in centre.</u></p> <p><u>(d) The number of staff appointed or designated must be in accordance with any staff-to-children ratios that may be—</u> <u>(i) prescribed by regulation; or</u> <u>(ii) required in the conditions of registration of the centre</u></p>	
Section 220	<p>Amend heading Minimum norms and standards for [shelters and drop-in centres] Insert new subsection (1) 220. (1) Premises used as a drop-in centre must -</p> <p>(a). <u>make an immediate assessment of the needs of the child and possibility of family re-unification</u></p> <p>(b) <u>attend to referral of child to external developmental agencies;</u></p> <p>(c) <u>keep daily register of all children with monthly reporting to the department of social services.</u></p> <p>(d) <u>have suitably qualified staff available during opening hours.</u></p> <p><u>(2) A drop-in centre must provide, in accordance with the prescribed standards, programmes for the children in its care. These programmes must include:</u></p>	<p>It is not sufficient to provide play, space, water, toilets, refuse services and hygienic food preparation. The additional clauses ensure that efforts are made to provide programmes that help children to change their living conditions. The register will ensure that children do not simply attend Drop In Centres for years whilst still living on the streets. If a child's name appears for too long on the register, the Department should question what is being done to return the child to his/her family or move him/her to a more permanent place of care. Recommendation Amend section 220(2) to the effect that it requires qualified staff to work at drop-in centres.</p> <p>Section 220 fails to mention the programmes for children at drop-in centres. Proper child care programmes must be put</p>

	<p>(a) <u>a development and treatment plan;</u> (b) <u>a family reunification or other appropriate placement programme;</u> (c) <u>access to education;</u> (d) <u>access to health services;</u> (e) <u>access to social development services; and</u> (f) <u>any other prescribed programme or service.</u></p> <p>(3) Premises used as [a shelter or] drop-in centre must have—</p> <p>(a) a safe area for the children to play; (b) adequate space and ventilation; (c) safe drinking water; (d) hygienic and adequate toilet facilities; (e) access to disposal of refuse services or other adequate means of disposal of refuse generated at the shelter or drop-in centre; and (f) a hygienic area for the preparation of food for the children.</p>	<p>in place at drop-in centres and other services provided for children on the street. There needs to be provision for programmes which provide for education, recreation, social work services and permanency planning</p>
<p>Sections 221, 222, 223 and 224</p>	<p>Delete all references to shelters</p>	
<p>Assignment of functions to municipalities Section 225</p>	<p><u>Proposed amendment: Delete clause 225</u> [Assignment of functions to municipality 225. (1) The provincial head of social development may, by agreement with a municipality, assign the performance of some or all of the functions contemplated in sections 215, 217, 218, 219, 221 and 222 to the most senior official responsible for social welfare services in the municipality if the provincial head of social development is satisfied</p>	<p>The functions and powers to be delegated to officials within the municipality will not protect or assist children living on the streets. Municipalities want merely to ‘clear the streets’ by getting rid of these children. Local government and business often share the view that children of the street need to be ‘punished,’ ‘controlled’ and ‘removed’.</p>

that the municipality has the capacity to perform the functions concerned.

(2) The senior official referred to in subsection (1) may delegate any power or duty assigned to him or her in terms of this section to an official in the employ of the municipality.

(3) A delegation in terms of subsection (2)—

(a) is subject to any limitations, conditions and directions which the delegating official may impose;

(b) must be in writing; and

(c) does not divest the delegating official of the responsibility concerning the exercise of the power or the performance of the duty.

(4) The delegating official may—

(a) confirm, vary or revoke any decision taken in consequence of a delegation in terms of this section, subject to any rights that may have accrued to a person as a result of the decision; and

(b) at any time withdraw a delegation.

(5) An applicant aggrieved by a decision of an official in the employ of a municipality with regard to the consideration of an application for registration, conditional registration or renewal of registration in terms of section 219, or the conditions on which registration was granted in terms of section 221, or a registration holder aggrieved by a decision of a provincial head of social development to cancel the registration of a shelter or drop-in centre in terms of section 222 may—

(a) lodge an appeal with the municipal council

	<p>against that decision; or (b) apply to the competent division of the High Court to review that decision.]</p>	
Section 226	<p>Death, <u>serious injury or abuse of child in [shelter or] drop in centre</u> 226. (1) if a child dies on the premises of a [shelter or] drop-in centre or following an occurrence at the [shelter or] drop-in centre the person operating the [shelter or] drop-in centre must immediately after the child's death report such death to (a) a police official; (b) <u>the provincial head of social development</u> (e) <u>the department of home affairs.</u></p> <p>(2) <u>The police official and the department of social development must inquire into the circumstances of the death of such child and, unless such police official or person within the department of social development is satisfied that the child has died of natural causes he/she must cause an investigation into the circumstances surrounding the death of the child to be conducted by the South African Police Service.</u></p> <p>(3) <u>if a child in a drop-in centre is abused or seriously injured, the person operating the drop-in centre must immediately report the matter to the provincial head of social development, who must cause an investigation into the circumstances of the abuse or serious injury to be conducted.</u></p>	<p>A child, who dies, is injured seriously or is abused whilst attending a Drop In Centre also needs the protection of a full investigation to determine if the Drop-In Centre is liable in any way.</p> <p>This clause should mirror the clause in chapter 13 relating to the death of a child in a Child and Youth Care Centre (clause 178).</p>
Section 227	Regulations	Given the fact that NGO's are essentially providing a service

<p>227. The Minister, after consultation with the Minister of <u>Education</u>, the Minister of <u>Health</u>; and the Minister of <u>Justice and Constitutional Development</u> where review of decisions by the courts are regulated; may make regulations in terms of section 306 <u>prescribing [concerning]—</u></p> <p>(a) the procedure to be followed [and the fees to be paid] connection with the lodging and consideration of applications for registration in terms of this Chapter and for the renewal of registration;</p> <p>(b) the different services that may be provided in terms of such registrations;</p> <p>(c) the procedure to be followed [and the fees to be paid] in connection with the lodging and consideration of appeals in terms of this Chapter;</p> <p>(d) the management of [shelters and] drop-in centres;</p> <p>(e) <u>the formats and contents of registration certificates;</u></p> <p>(f) <u>methods and procedures to enforce compliance with registration conditions;</u></p> <p>(g) <u>matters in connection with the physical attributes, operation and management of drop-in centres; including the setting of minimum norms and standards in this regard</u></p> <p>(h) <u>the provision of programmes at drop-in centres to meet the developmental, therapeutic and recreational needs of children;</u></p> <p>(i) <u>an assessment of and the formulation of an individual developmental and permanency plan for</u></p>	<p>which government is responsible for it is unfair that they be required to pay a fee to provide the service.</p>
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each child;

- (j) the powers and duties of the management boards of drop-in centres;
- (k) the composition of management boards, which may include representation for staff and residents;
- (l) matters relating to members of management boards, including—
 - (i) appointment procedures;
 - (ii) qualifications for membership;
 - (iii) term of office;
 - (iv) filling of vacancies; and
 - (v) suspension or termination of membership;
- (m) matters relating to the functioning of management boards, including—
 - (i) designation and functions of presiding members;
 - (ii) the convening and conduct of meetings;
 - (iii) quorums; and
 - (iv) the appointment and functioning of committees of a board;
- (n) matters relating to training, minimum qualifications and experience of staff of drop-in centres;
- (o) matters relating to the responsibilities of and interaction between the management board and the staff and residents of a drop-in centre;
- (p) the reporting responsibilities of management boards and staff to the department, person or organisation operating the drop-in centre;
- (q) the format of the constitution or founding document of a drop-in centre and the matters to be regulated in such constitution or founding document;

	<p><u>(r) management, disciplinary and other practices in drop-in centres;</u></p> <p><u>(s) matters in connection with quality assurance processes and organisational development plans established in terms of such processes for drop-in centres, including—</u></p> <p><u>(t) the composition of teams to conduct internal and independent assessments;</u></p> <p><u>(ii) the qualifications of team members and the remuneration payable to members of independent teams;</u></p> <p><u>(iii) the manner in which internal and independent assessments must be conducted;</u></p> <p><u>(iv) the core components of organisational development plans;</u></p> <p><u>(v) the implementation, revision and amendment of such plans;</u></p> <p><u>(vi) the monitoring of implementation and reporting of violations of such plans; and</u></p> <p><u>(vii) the qualifications, functions and remuneration of mentors appointed to oversee the implementation of such plans; and</u></p> <p><u>(u) any other matter that may be necessary to facilitate the implementation of this Chapter.</u></p>	
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Aftercare services

Chapter 8 Prevention and Early Intervention Services should contain references to aftercare services. Aftercare is a form of prevention it focuses on family counselling and reintegration of the child in his/her home community, by -

- (a) building support for families and children within community networks; and
- (b) creating support networks for children at risk of becoming street children, especially the friends and siblings of children who were once street children.

Emergency accommodation services

The Bill is unclear about the provision of emergency overnight accommodation. If a child is left in a safe house does a designated social worker have to be informed? Who pays for this service? And who is accountable for the child whilst they are in a safe house? Currently some Drop-in centres are forced to provide this service as there is nowhere else for children to sleep in an emergency until they can be transferred to a registered shelter or child and youth care centre. They are not adequately equipped to do so, nor are the staff qualified to provide residential care, therefore children are not adequately protected. It is recommended that overnight emergency facilities need to be included in chapter 14 and that those facilities would operate as a separate entity from a drop-in centre.