



children's
institute

child rights in focus
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Submission from the Children's Institute, UCT on the Criminal Law (Sexual Offences and Related Matters) Amendment Act Amendment Bill [B16 – 2020], Domestic Violence Amendment Bill [B20 – 2020] and Criminal Matters Amendment Bill [B17 – 2020]

Introduction

The Children's Institute (CI) was established in 2001 as a multi-disciplinary policy research unit located in the Faculty of Health Sciences of the University of Cape Town. CI aims to contribute to policies, laws and interventions that promote equality and realise the rights and improve the conditions of all children in South Africa, through child focused policy research, advocacy, education and technical support. One of the CI's research focal areas is the prevention of and responses to violence experienced by children in South Africa. These laws impact on several of children's rights under the constitution and international law:

- Best interests of the child - section 28(2)¹
- Right to dignity- section 10 [also 35(2)(e)]²
- Right to privacy and confidentiality- section 14³

¹ United Nations Convention on the Rights of the Child of 1989 *article 3(1) [also 9, 18(1), 20(1) and 21]*; African Charter on the Rights and Welfare of the Child of 1990 *article 4 [also 9(2), 19(1), 20(1)(a), 24, 25(2)(a) and(3)]*; Children's Act of 2005 - *sections 7 and 9*

² United Nations Convention on the Rights of the Child of 1989 *articles 23(1), 28(2), 37(c), 39 and 40(1)*; African Charter on the Rights and Welfare of the Child of 1990 *articles 11(5), 13(1), 17(1), 20(1)(c) and 21(1)*; Children's Act of 2005 - *section 6(2)(b) [also 11]*

³ United Nations Convention on the Rights of the Child of 1989 *article 16 [also 40(2)(b)(vii)]*; African Charter on the Rights and Welfare of the Child of 1990 *article 10*;

- Right to protection from violence, abuse, maltreatment, neglect and exploitation- sections 12(1), 28(1)(d), (e) and (f) [also 13]⁴

We note that the state bears three levels of obligation in relation to protection from violence:

*(a) The obligation to **prevent** violence against children*

This is given effect by, for example, providing a range of supportive and educative programmes for those who care for children; programmes that equip caregivers and children with good interpersonal-relationship skills and non-violent forms of conflict resolution; by reducing exposure to domestic violence; and ensuring that people convicted of committing violent acts are not employed in positions where they have access to children.

*(b) The obligation to **protect** children **from further harm** if they have already experienced violence*

This obligation is given effect by, for example, providing a range of early intervention services (such as child and family counselling); child protection services to identify, refer, and support children and families suffering from violence; and shelters and therapeutic services for women who have experienced domestic violence. It is also given effect by a functioning criminal justice system that aims to arrest, convict, sentence and rehabilitate perpetrators of violence against children.

*(c) The obligation to **support and treat** children who have experienced violence so as to restore them to physical and psychological health*

It is given effect by, for example, providing treatment and rehabilitation programmes for physical injuries and therapeutic services for psychological harm. This level of obligation is an oft-neglected aspect of the right to protection from violence but is essential for breaking the intergenerational cycle of violence.

The Children's Institute is concerned that the Criminal Law (Sexual Offences and Related Matters) Amendment Act Amendment Bill [B16 – 2020] infringes on

- Right to special protection within the criminal justice system for children in conflict with the law- sections 28(1)(g) and 35⁵

⁴ United Nations Convention on the Rights of the Child of 1989 *articles 19, 32, 33, 34 and 36*; African Charter on the Rights and Welfare of the Child of 1990 *articles 15, 16, 27, 28 and 29*; Children's Act - *section 1 [See the definition of "care" in subsection (c)], 2(b)(iii), and 32(1)(b)*

⁵ United Nations Convention on the Rights of the Child of 1989 *articles 37 and 40*; African Charter on the Rights and Welfare of the Child of 1990 *article 17*; Child Justice Act of 2008 - *section 3 (also see the rest of the Act)*

Criminal Law (Sexual Offences and Related Matters) Amendment Act Amendment Bill [B16 – 2020]

It is important for children and persons with mental disabilities, and now the broader categories of vulnerable groups to be protected from coming into contact with people known to have a history of sexual offences, by preventing known sex offenders from engaging in employment that would put them in close proximity with vulnerable groups. The Children's Institute believes that screening against the National Register for Sex Offenders is not the most effective way of providing such protection. Rather employers should be required to use the **SAPS Criminal Record system** (collected by the Criminal Record Centre of the South African Police Service) in place of a register, to block the employment of persons who have been convicted of relevant offences, including sexual offences. This has many advantages over the NRSO.

Children and vulnerable groups need protection from people who have committed a range of violent crimes

Firstly, whilst it is important to protect children from sexual predators, there may be persons who have committed equally serious crimes that should disqualify them from working with children and other vulnerable groups. The SAPS criminal records system that records all convictions serves this purpose and the use of it provides a more comprehensive view in relation to a person who is applying for a job. Unlike the NRSO or the National Child Protection Register, the SAPS Criminal Record system contains information on **any person** found guilty of **any crime**, sexual or otherwise, against children, persons with disabilities and other vulnerable groups. The SAPS Criminal Record system contains all the historic data necessary as up to most recently. The SAPS Criminal Record system provides not just information on convictions of sexual offences but other convictions that may be relevant to a particular job that would place a person in contact with children. For example, a driver who has convictions for driving under the influence or teacher who has a criminal record of physically (but not sexually) assaulting children. The SAPS System would be a single repository of information that would be relevant to particular employers.

Multiple registers serving similar functions causes confusion

Secondly, South Africa has two registers – the NRSO which falls under the Ministry of Justice and Correctional Services, and the National Child Protection Register (NCPR) which falls under the Ministry of Social Development. Part B of the NCPR and the NRSO have **an almost identical purpose** ie to prevent people convicted of offences against children from being able to work with children. Thus, employers who want to employ people who will come into contact with children are legally obliged to check whether their names are on these registers. It would be less onerous and confusing

to employers to have to have a single screening process rather than having to screen against multiple registers held by different departments.

The NRSO is not functioning effectively

Thirdly, the effectiveness of the NRSO is compromised by the lack of State resources. In 2018/2019 it was reported that a total of 19 688 cases on the NRSO were validated (these are cases in the NRSO between 2009 and 2018/2019).⁶ Considering that in the five year period between 2015 and 2020 over 120,000 sexual offences against children were reported to the South African Police Service. If one assumes that a large number of perpetrators committing sexual offences against children should have made it on the NRSO, then the NRSO is still a long way from obtaining all the information necessary to achieve its objectives. Using the SAPS Criminal Record system would ensure that limited resources are pooled into ensuring that only one system, that is already functioning, provides the information needed to identified stakeholders. Screening against the SAPS Criminal Record system would be more reliable.

Regulating the removal of persons from the National Register for Sex Offenders

The proposed amendments seek to increase the duration of time that an individual's details remain on the NRSO. When it comes to the deciding how long to include a child offender's name on the NRSO two sets of rights must be taken into consideration. Child offenders have a right to special protection within the criminal justice system this right is protected under international law, UNCRC articles 37 and 40; regional law African Charter on the Rights and Welfare of the Child article 17; and under the Constitution sections 28(1)(g) and 35. All children have the right to protection from abuse UNCRC articles 19, 23, and 34; the ACRWC articles 13, 16 and 27; and the Constitution sections 12(1), and 28(1)(d). Additionally, the best interests of both the offender and other children must be considered.

In the *J v NDPP*⁷ case the Constitutional Court found that:

- the automatic inclusion of child offenders names in the National Register of Sex Offenders results in an unacceptable limitation of the rights of child offenders;
- the vast majority of child offenders who commit sexual offences as children do not grow up to become adult sex offenders who prey on children;

⁶ Department of Justice and Constitutional Development "Annual Report 2018/2019" (2019) p72. <accessed at <https://www.justice.gov.za/reportfiles/anr2018-19.pdf>>.

⁷ *J v National Director of Public Prosecutions and Others* [2014] ZACC 13; 2014 (2) SACR 1 (CC) par 12.

- child offenders must be treated as individuals and that the problem with an automatic provision is that it does not allow a court to differentiate between children who really will grow up to pose a threat to others, and those that probably will not;...

The amendments brought about by Act 5 of 2015 have made it far less likely that child offenders particular's will be placed on the register as the state will have to review each case individually. And, section 51(2A) of the Act allows children (or persons who were children when they committed offences) to apply for the removal of their details at any time, however, most children do not have the capacity or the resources to do this (with or without the assistance of their families). Given children's potential for rehabilitation and reintegration we believe that the duration of time that an individual's information on the SAPS system should not be increased if that person is a child offender or was a child at the time of the commission of the offence.

Publishing the details of child offenders

The proposed amendments to section 42 of the Act grant the Registrar the power to make the full names, surnames, identity number and the sexual offence, of every person whose particulars have been included in the NRSO, publicly available. Where "every person" includes child offenders or people who were children at the time of the commission of the offence. We believe the inclusion of children is unconstitutional as our Constitution requires that children are treated differently from adults,⁸ and in a manner that, in as far as is possible, promotes their rehabilitation and reintegration.⁹ The state has a duty to protect children's right to dignity, and privacy, where the protection of children's identities promotes the implementation of restorative justice and guards against exposure to stigmatisation that would hinder rehabilitation and reintegration.¹⁰ Publishing a child's name fails to treat child offenders differently from adults, compromises their ability to be reintegrated and reformed, and violates the best interest principle. The provision, if adopted, must explicitly create an exception for children (or persons who were children at the time of the commission of the offence) from having their names made public.

Place a statutory obligation on the state to provide therapeutic services to child victims and witnesses throughout the criminal process

While there is a statutory obligation on the state to provide therapeutic services to children and families in general, there are no clear obligations on the state in either the Criminal Procedure Act or

⁸ *J v National Director of Public Prosecutions and Others* [2014] ZACC 13; 2014 (2) SACR 1 (CC) par 12.

⁹ *Centre for Child Law v Minister for Justice and Constitutional Development and Others* [2009] ZACC 18

¹⁰ *Centre for Child Law and Others v Media 24 Limited and Others* [2019] ZACC 46,

Sexual Offences Act to ensure that child victims and witnesses receive therapeutic services, counselling, court preparation and support, which are essential to protect children from secondary trauma as well as ensure good case outcomes and facilitate behavioural and emotional adjustment of child offenders. Amending the Sexual Offences Act and Criminal Procedure Act to place such an obligation expressly on the state would help to ensure that such services are prioritised for delivery and budget allocations.

1. Amendment of section 2 of Act 32 of 2007	The effect of the amendment is to increase the offence categories in respect of which offender’s particulars must be entered in the Register. One advantage of it is that it will be easier to identify ‘all’ sexual offences as opposed to only certain offences identified by victim category, however, it fails to distinguish between the severity of cases or the nuances in relation to consensual but unlawful acts between children.
3. Amendment of section 12 of Act 32 of 2007	The Constitutional Court has ruled that criminalising children for engaging in consensual sexual acts violates their rights. Children should be excluded from this section and developmental approach should be used to correct behaviour and matters dealt with by referral to appropriate early intervention services under the Children's Act.
5. (c) Amendment of section 40 of Act 32 of 2007, as amended by section 36 of Act 8 of 2017	Definition of ‘person who is vulnerable’. The broad categories listed are vulnerable but their need for protection is not heterogeneous. The experience of violence changes across the life course and children, women under 25 and older people have different risks and require different forms of protection. The concern with including all vulnerable groups in one category is that the Act does not allow for a differentiated response. For example, consensual acts such as the sharing of sexual images of peers is considered criminal offence for adolescents but not for adults, but children who share pictures of peers are not likely to prey on young children as adults.
7. Amendment of section 42 of Act 32 of 2007, as amended by section 36 of Act 66 of 2008	The effect of the amendment is to increase the offence categories in respect of which offender’s particulars must be entered in the Register. One advantage of it is that it will be easier to identify ‘all’ sexual offences as opposed to only certain offences identified by victim category, however, it fails to distinguish between the severity of cases or the nuances in relation to consensual but unlawful acts between children.
16. Substitution of section 51 of Act 32 of 2007, as amended by section 8 of Act 5 of 2015	This has the effect of doubling all time periods for which a convicted person’s particulars must stay on the register. This is in contravention of children’s right to be treated differently to adults. This amendment should not apply to children.

Domestic Violence Amendment Bill [B20 – 2020]

Context

Violence against women (VAW) and violence against children (VAC) are both conceptualised as global public health and human rights problems.¹¹ They co-occur in the same households, share common risk factors, and are prevalent in societies and communities where social norms condone violence.¹² Both forms of violence lead to similar health outcomes and have implications for the intergenerational transmission of violence.¹³ This increased recognition of the nexus between VAW and VAC requires us to deepen our understanding of these intersections - to better integrate our approaches to respond to these two issues this increasing safety for both women and children.¹⁴

VAW and VAC are considered endemic in South Africa (Norman et al., 2010). The 2018/2019 police crime statistics showed that 36 597 reported cases of sexual offenses were reported by women and 24 387 were for children below the age of 18 years (SAPS, 2019). National and community-based studies is important to deepen our understanding of VAC and VAW in South Africa.¹⁵ The South African Demographic Health Survey (2019) found 26% of women aged 18 years and older had experienced physical, sexual, or emotional violence by an intimate partner in their lifetime. While a dedicated VAW study in Gauteng report higher rates and estimate that 51.3% of women had experienced some form of violence.¹⁶ VAC is also widespread, the first national Optimus study estimated that over 355, 000 cases of sexual abuse had occurred among 15-17 year olds in 2015.¹⁷ A community-based study with children aged 10-17 years old showed high levels of physical (56.3%), emotional (35.5%) and sexual (5.3%) abuse mainly perpetrated by either primary caregivers, teachers, relatives, girlfriend/boyfriends or other peers.

Violence against children has major public health consequences. The most severe is premature death and the ultimate rights violation, loss of life. Life-long physical or mental disability is also a common consequence, one that places heavy financial burdens on the families who have to care for children with disabilities. In addition, serious physical injury exacts a high toll on state resources in

¹¹ Guedes A, Bott S, Garcia-Moreno C, Colombini M. Bridging the gaps: a global review of intersections of violence against women and violence against children. *Global Health Action*. 2016 Dec 1;9(1):31516.

¹² Bacchus LJ, Colombini M, Contreras Urbina M, Howarth E, Gardner F, Annan J, Ashburn K, Madrid B, Levto R, Watts C. Exploring opportunities for coordinated responses to intimate partner violence and child maltreatment in low- and middle-income countries: A scoping review. *Psychology, Health & Medicine*. 2017 Mar6;22(sup1):135-65.

¹³ Bacchus LJ, Colombini M, Contreras Urbina M, Howarth E, Gardner F, Annan J, Ashburn K, Madrid B, Levto R, Watts C. Exploring opportunities for coordinated responses to intimate partner violence and child maltreatment in low- and middle-income countries: A scoping review. *Psychology, Health & Medicine*. 2017 Mar6;22(sup1):135-65.

¹⁴ Fry DA, Elliott SP. Understanding the linkages between violence against women and violence against children. *The Lancet Global Health*. 2017 May 1;5(5):e472-3.

¹⁵ Chitsamatanga BB, Rembe NS. School-Related Gender-Based Violence as a Violation of Children's Rights to Education in South Africa: Manifestations, Consequences and Possible Solutions. *Journal of Human Ecology*. 2020;69(1-3):65-80.

¹⁶ Machisa MT, Christofides N, Jewkes R. Structural pathways between child abuse, poor mental health outcomes and male-perpetrated intimate partner violence (IPV). *PloS One*. 2016;11(3)

¹⁷ Ward CL, Artz L, Leoschut L, Kassanje R, Burton P. Sexual violence against children in South Africa: A nationally representative cross-sectional study of prevalence and correlates. *The Lancet Global Health*. 2018 Apr 1;6(4):e460-8.

that it necessitates expensive trauma units¹⁸ as well as follow-up health rehabilitation and social support to children and their families.

The impact of violence goes beyond physical injuries and visible scars: Evidence has shown long-lasting psychosocial consequences. Where girls are victimised, these include depression, anxiety disorders, substance abuse, suicidality and unwanted pregnancy. Boys in turn are prone to manifesting behavior such as truanting, gang involvement and crime.¹⁷ Violence is intergenerational, with children who are exposed to violence in their early years being at risk of revictimisation as they get older.¹⁹ Girls in particular are at risk of sexual assault in later years, facing a heightened danger of becoming victims of intimate partner violence; their victimisation as children also affects their emotional availability as parents.²⁰

Boys have been shown to be at an increased risk of perpetrating violence, including rape and violence against their intimate partner, and of engaging in risky behaviour.²¹ Exposure to neglect, physical and sexual abuse, and harsh parenting are important factors in their pathway to violent behaviour in the community and home during adolescence as well as adulthood. Experiencing or witnessing violence in childhood has an enduring intergenerational effect: children learn violent ways of resolving conflict and come to valorise such behaviour in the community as it earns them the respect they seek.²²

Definitions

1(b) Coercive behaviour and controlling behaviour –Coercive and controlling behaviour may not necessarily be an objective list of factors but rather how the victim or survivor experiences these acts.

1(i) The definition of “domestic violence”

(a) the definition of physical abuse should include a specific reference to “corporal punishment”;

(g) Stalking – do not delete stalking from the Act. Stalking can be part of an act of domestic violence against an intimate partner. Removing stalking from the Act and wholly placing it under the Protection from Harassment Act 17 of 2011 shows a failure to acknowledge the various forms domestic violence can take and how it occurs on a continuum.

(hD) Exposing or subjecting children, to behaviour listed in (a) to (hD) – we suggest that this definition. should be expanded to include other “related persons”.

1(j) Economic abuse – this section must include related persons.

¹⁸ Norman R, Matzopoulos R, Groenewald P & Bradshaw D (2007) The high burden of injuries in South Africa. *Bulletin of the World Health Organization*, 85(9):695-702.

¹⁹ Callendar T & Dartnall L (2010)

²⁰ Bordin IA, Duarte CS, Peres CA, Nascimento R, Curto BM & Paula CS (2009) Severe physical punishment: Risk of mental health problems to poor urban children in Brazil. *Bulletin of the World Health Organization*, 87:336-344.

²¹ Abrahams N & Jewkes R (2005) What is the impact of witnessing mother abuse during childhood on South African men’s violence as adults? *American Journal of Public Health*, 95:1811-1816.

²² Abrahams N & Jewkes R (2005) What is the impact of witnessing mother abuse during childhood on South African men’s violence as adults? *American Journal of Public Health*, 95:1811-1816.

Services for complainants relating to domestic violence

For women experiencing domestic violence, shelters offer sanctuary where they can avoid further harm to themselves and their children. Studies of five shelters in Gauteng found that in most cases the women accessing these shelters were doing so for the first time; moreover, 53% of women did not return to their abusive partners after having been in the shelter.²³ Shelters are viewed as the “critical point of crisis intervention”, with counselling for women and children being a key element of the support services they offer.²⁴ Shelters are thus an important form of crisis intervention to protect women and children from further violence.

Gender-based violence shelters are an essential service, providing not only a place to stay, but a safe space for women and children to recover from trauma. Victims and survivors need more than a roof over their heads: they need effective legal, medical and psychosocial support. Women often also need quality childcare facilities to be able to take proper advantage of these services.

Children staying in shelters with their mothers have not been removed from the family environment and the duty of care still rests with the parent. Therefore, the regulations relating to registration need not be as strict as those in the Children’s Act for residential care. However, where shelters provide early childhood development programmes those should be regulated in terms of Chapter 6 of the Children's Act (38 of 2005).

Children’s co-victimisation by domestic violence is not well recognised in South Africa, where services are geared only to the needs of adult women. Shelters struggle to meet the material and psychosocial needs of children co-resident in the shelters, despite the evidence that the average woman arriving at a shelter is accompanied by two children. Spaces and services for older male children are particularly lacking.²⁵

Children should also receive appropriate psychological support

There should be minimum standards that regulate therapeutic services for children who have experienced or witnessed domestic violence that recognize and promote the importance of a family-centred approach.

Promote removal of offenders in the best interests of children

Designated social workers and police officers should be trained and encouraged to use section 153 of the Children’s Act to remove offenders, rather than women and children, from the household when abuse has taken place in the home.

Obligation to report domestic violence and to provide information

2A. Harmonise reporting requirements in relation to children with section 110 of Children's Act (38 of 2005).

Reporting obligations should be harmonised with Children's Act to avoid confusion – these provisions differ in respect of who is obligated to report, what they must report and to whom. The

²³ Bhana K, Vetten L, Makhunga L & Massawe D (2012) *Shelters Housing Women who have Experienced Abuse: Policy, Funding and Practice*. Tswaranang Legal Advocacy Centre & The Heinrich Boll Stiftung Southern Africa.

²⁴ Nagia-Luddy F & Mathews S (2011) *Service Responses to the Co-victimisation of Mother and Child: Missed Opportunities in the Prevention of Domestic Violence*. Technical report. Cape Town: RAPCAN & MRC.

²⁵ Nagia-Luddy F & Mathews S (2011) *Service Responses to the Co-victimisation of Mother and Child: Missed Opportunities in the Prevention of Domestic Violence*. Technical Report. Cape Town: RAPCAN & MRC.

provisions in the Children's Act are more comprehensive and require that reports are submitted to the SAPS or designated social workers in the Department of Social Development or designated child protection organisations. A cross-reference should be inserted to the Children's Act this will ensure a standard protocol for reporting of child abuse and provide clarity for professionals working with children.

There must be a provision in this section providing for immunity for reporting domestic violence. This should reflect section 54(2)(c) of SORMA which states '[a] person who in good faith reports such reasonable belief or suspicion shall not be liable to any civil or criminal proceedings of making such report'.

Seizure of dangerous weapons:

These amendments are welcomed. Notably the amendments directing the police to seize weapons "regardless of the requirements of the respondent's employment to possess such weapon." This is a notable amendment which protects women and children in abusive relationships where their partner is a member of the SAPS or security forces and is lawfully entitled to a weapon, especially a firearm as part of their employment. Given the frequent occurrence of such individuals harming or killing their partners and children, this amendment is warmly welcomed.

Returning weapons to the respondent goes against the principle of protecting women and children from gun violence in domestic violence cases. The Act should provide that any weapon seized in connection with a domestic violence case be confiscated and the firearm licence of the owner of the weapon should be suspended for a period of 5 years or more.

Sentencing

Imposing harsher sentences has not been proven to act as a deterrent to domestic violence or other forms of violence against women and children. To the contrary, evidence has shown that the death penalty and life sentences do not prevent crime or minimise violence. The Children's Institute rather advocates for a functional criminal justice system which successfully prosecutes offences and calls for law enforcement services which better serve communities.

Training for police officers and magistrates

The DVA must include a mandate training for Magistrates and impose obligations on the National Police Commissioner to ensure regular comprehensive training for members of the SAPS.

Such training must be gender-transformative in the sense that it seeks to challenge harmful gender norms and promote gender equality in society. Any training must also emphasise a feminist, victim-centred and intersectional approach to their dealings of domestic violence and at all times respect the inherent dignity of any complainant.

Data collection

A surveillance system should also be developed for violence against women and children, which is accessible and can be used by governmental departments, such as the DBE, DOH, DSD, DOP, DJCD and NPA. A central surveillance system with information from health facilities, educational facilities, police services, courts etc. would enable better information-sharing and data-management in victim services. Such a system would also allow for better monitoring of cases of violence against women and children. All data should be disaggregated by type of violence, relationship between the victim/survivor and the perpetrator, and in relation to intersecting forms of discrimination and other

relevant socio-demographic characteristics, including the age of the victim/survivor. Data from a surveillance could also inform interventions and the planning of services.

<p>2 Amendment of section 1 of Act 116 of 1998, as amended by section 10 of Act 31 of 2008</p> <p>Definitions</p>	<p>1(c) & (d). Coercive and controlling behaviour may not necessarily be an objective list of factors but rather how the victim or survivor experiences these acts.</p>
	<p>1(i) The definition of “domestic violence”</p> <p>(a) the definition of physical abuse should include a specific reference to “corporal punishment”;</p> <p>(g) Stalking – do not delete stalking from the Act. Stalking can be part of an act of domestic violence. Removing stalking from the Act and wholly placing it under the Protection from Harassment Act 17 of 2011 shows a failure to acknowledge the various forms domestic violence can take and how it occurs on a continuum.</p> <p>(hD) Exposing or subjecting children, to behaviour listed in (a) to (hD) – we suggest that this definition. should be expanded to include other “related persons”.</p>
<p>3. Insertion of sections 2A and 2B in Act 116 of 1998</p>	<p>2A. Harmonise reporting requirements in relation to children with section 110 of Children's Act (38 of 2005).</p>
<p>13. Substitution of section 9 of Act 116 of 1998</p>	<p>Section 9(3) should be amended to ensure that the firearm licence should be suspended for a period of 5 years or more.</p>

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