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CALL FOR SUBMISSIONS ON THE CHILDREN'S AMENDMENT BILL, 2025

DRAFT AMENDMENT ACT, No. 53426, 26 SEPTEMBER 2025

16 NOVEMBER 2025

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I. INTRODUCTION

- 1 SECTION27 (Incorporating the Aids Law Project) welcomes the opportunity to make submissions on the Draft Amendment Bill, Government Gazette No. 53426 of 26 September 2025 (“Draft Amendment Bill”), which proposes various amendments to the Children’s Act 38 of 2005 (“Children’s Act/Principal Act”).
- 2 SECTION27 is a public interest law clinic that works to influence, develop, and use the law to further the rights to health and basic education in South Africa through research, advocacy, and litigation.
- 3 SECTION27 has been working in the realm of the rights to basic education and the rights of the child. The upholding of the rights to basic education and children can be achieved through the efficacy of the National Child Protection Register (“NCPR”). It is through our experiences in enforcing accountability and the efficacy of the NCPR that we make these submissions.¹ We welcome the proposed amendments which relate to the establishment of a Registrar for the NCPR in the Children’s Act. However, we make submissions on clauses 6, 49, 52, and 56 of the Draft Amendment Bill.
- 4 Our submission is structured as follows. First, we canvass the background and SECTION27’s interest in child protection law. This is followed by an analysis of some of the proposed amendments that relate to the establishment of a Registrar of the NCPR and the implementation of the NCPR. Third, we interrogate the clauses relating to the manner in which child proceedings are dealt with. Fourth, we address the risks of allowing persons listed in Part B of

¹ We do not make submissions on all the proposed amendments as some of them lie beyond our expertise.

the NCPR to be employed within the South African Police Service (“SAPS”). Fifth, we address the challenges with the National Register of Sex Offenders (“NRSO”) and how these challenges can be used to improve the efficiency of the NCPR. Sixth, we touch on the importance of accountability and transparency mechanisms to ensure efficiency of the NCPR. Lastly, we provide a brief conclusion to our submissions.

II. BACKGROUND AND SECTION 27’S INTEREST IN CHILD PROTECTION

- 5 Gender-based violence (“GBV”) is endemic in South Africa. According to the 2024/25 third-quarter crime statistics released by the SAPS, 11 803 cases of rape were reported, and 2 188 cases of sexual assault were also reported.² Even though there was a 3.3% decrease in reported rape cases, there was a 3.5% increase in reported sexual assault cases.³
- 6 Additionally, the South African Council of Educators’ (“SACE”) 2024/25 Annual Report states that 134 cases of sexual misconduct by educators were reported to SACE.⁴ This was a slight decrease from 148 reported cases of sexual misconduct in the 2023/24 SACE Annual Report.⁵
- 7 Statistics and reports referenced above demonstrate the rampant nature of sexual violence against children. Sexual violence constitutes a grave violation of various constitutional rights, including rights specifically afforded to children.

² Release of Crime Statistics, 3rd Quarter of 2024/25, South African Police Services, [polmag-feb-crimestats-release-2025.pdf](#), (Accessed on 05 November 2025).

³ Ibid, page 3.

⁴ South African Council for Educators 2024/25 Annual Report, [SACE_2024-25_Annual_Report_FINAL.pdf](#) (Accessed 05 November 2025)

⁵ South African Council for Educators 2023/24 Annual Report, [sace_30613-2024-12-02-SACE_ANNUAL_REPORT_2023_24.pdf](#), (Accessed 05 November 2025)

Consequently, the State carries an elevated duty to protect children from all forms of violence.

- 8 High rates of sexual violence against children in South Africa reinforce the importance of implementing effective safeguards. The NCPR is one such safeguard, and if properly maintained, can contribute to creating a safer country for children in which they can grow and develop to their potential.
- 9 Despite the NCPR having been in place since 2010, unacceptable levels of sexual violence against children persist, particularly in the school environment. One of the reasons for this is failure to implement the NCPR and to hold those responsible for updating, maintaining, and applying the NCPR to account.
- 10 SECTION27 has been involved in a few cases relating to sexual violence against children, which illustrate the abovementioned failures. One case involved the rape of a 12-year-old girl by a caretaker at a school in North-West in 2015.
- 11 A year later, the caretaker sexually assaulted her sister. The Principal, School Governing Body (“SGB”) and the North-West Department of Education (“NWDoE”) had failed to take any steps in holding the perpetrator to account. In 2021, SECTION27 successfully instituted a court application to compel the NWDoE, the Principal, and the SGB to take the necessary steps to ensure that the perpetrator was held to account. The court order was granted on 24 March 2022.
- 12 It was only after SECTION27’s intervention that the Principal, SGB and NWDoE held a disciplinary hearing against the caretaker. The Disciplinary

Committee held that the caretaker was guilty of rape and sexual assault and recommended that the perpetrator be dismissed.

- 13 Despite this finding, and the clear legislative obligations to report the findings to the Director-General of the Department of Social Development ("DSD") for inclusion in the NCPR, this was not done. SECTION27 once again intervened and requested that the NWDoE report the caretaker to the DSD to have the caretaker's name placed on Part B of the NCPR. The NWDoE failed to do so. SECTION27 approached the DSD directly, and it was only in March 2023 that the Caretaker's name was placed on the NCPR.
- 14 Following this incident, SECTION27 engaged with the government departments that have a legal obligation to maintain the NCPR to establish the extent to which it has been maintained and implemented. The engagements revealed failures to discharge the legal obligations set out in the Children's Act.
- 15 As a result, in October 2025, SECTION27 approached the Gauteng High Court in Pretoria, representing the Teddy Bear Foundation seeking a declaratory order against the DSD, Department of Justice and Constitutional Development ("DOJ&CD"), Department of Basic Education ("DBE"), Provincial Education Departments ("PED"), SACE, and the Educators Labour Relations Council ("ELRC"), to discharge their constitutional and legislative obligations to maintain and implement the NCPR.⁶

⁶ SECTION27 PRESS STATEMENT: Predators in our Schools: Teddy Bear Foundation takes DBE and Others to Court for ignoring the National Child Protection Register, PRESS STATEMENT | Predators in Our Schools: Teddy Bear Foundation takes DBE and others to Court for Ignoring the National Child Protection Register – Section27 (Accessed 05 November 2025).

III. SUBMISSIONS ON CLAUSE 2 OF THE DRAFT AMENDMENT BILL

- 16 Section 6 of the Children’s Act sets out the general principles that guide its implementation as well as all proceedings, actions and decisions by any organ of state in a manner concerning a child or children in general. Section 6(2)(d) provides that all proceedings, actions and decisions concerning a child must protect the child from unfair discrimination on any ground, including on the grounds of the health status or disability of the child or child’s family member. Clause 2(a) proposes a substitution that reads: protect the child from unfair discrimination on any ground as contemplated in Protection of Personal Information Act 4 of 2013 (“POPIA”), Child Justice Act 75 of 2008, and any other relevant legislation [including on the grounds of the health status or disability of the child or a family member of the child];
- 17 The proposed amendments replace the original specific list of grounds for unfair discrimination with reference to the POPIA and other relevant legislation.⁷ We are concerned with this proposed substitution for two reasons. First, the inclusion of the reference to POPIA could create a substantive problem. POPIA does not define unfair discrimination, nor does it list unfair discrimination grounds. Whilst POPIA does contain relevant categories in section 26(a), which relate to the prohibition of processing “special personal information,” on the grounds of one’s religious or philosophical beliefs, race or ethnic origin, health or sex life.⁸ It is important to note that these categories are not unfair discrimination grounds. They only trigger stricter rules for processing

⁷ Protection of Personal Information Act 4 of 2013.

⁸ Ibid, sec 26(a).

personal information. The Bill's wording is misdirected and diminishes existing protections by removing explicit anti-discrimination language.

- 18 SECTION27 submits that section 6(2)(d) of the Children's Act should retain explicit reference to non-discrimination based on the child's or caregiver's health status or disability. POPIA was established to govern data protection rather than to address equality and non-discrimination. POPIA does not include a list of grounds for unfair discrimination and is consequently not a suitable reference for this purpose. The amendment should instead refer to section 9 of the Constitution of the Republic of South Africa, 1996⁹ ("Constitution") and the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 (which specifies grounds of unfair discrimination).¹⁰

IV. SUBMISSIONS ON CLAUSE 49 OF THE DRAFT AMENDMENT BILL

- 19 We welcome the designation and establishment of a Registrar for the NCPR as a progressive step toward strengthening child protection systems. Clause 49 of the proposed Amendments provides that the Director-General must designate an official from DSD as the Registrar. Sections 111, 117, and 117A of the Draft Amendment Bill establish the Registrar as the authority responsible for managing enquiries, processing applications for removal of names, and maintaining accurate records of individuals who are unsuitable to work with children. The consolidation of these functions ensures efficiency, accountability, and consistency in implementing the NCPR.

⁹ The Constitution of the Republic, 1996, sec 9(3) lists the grounds of discrimination. It states: "The state may not unfairly discriminate directly or indirectly against anyone on one or more grounds, including race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language and birth."

¹⁰ Promotion of Equality and Unfair Discrimination Act 4 of 2000.

- 20 The Draft Amendment Bill enhances the Registrar's role through sections 119, 125, 126, and 127, which vest the Registrar with the power to manage Part B of the NCPR, handle suitability checks, and communicate decisions within the prescribed timelines. Furthermore, section 142 is significant in that it authorises the Minister to prescribe regulations for the Registrar's powers, duties, and responsibilities. This would ensure operational clarity, set performance standards, and introduce accountability measures such as audits and compliance protocols.
- 21 Furthermore, the establishment of the Registrar aligns with the constitutional obligations under section 28 of the Constitution, which guarantees every child the right to protection from maltreatment, neglect, abuse, and degradation, as well as the principle of the best interests of the child.¹¹ The establishment of the Registrar ensures the realisation of these rights by ensuring that individuals unsuitable to work with children are identified and barred from roles that involve interaction with children.
- 22 It is evident that the role of the Registrar is an important one. Clause 49 is broad and does not provide sufficient guidance to the Director-General on the competencies for a suitable candidate. We therefore recommend that the candidate is at a level of a senior administrator with experience children's rights sector.

¹¹ Constitution of the Republic of South Africa, 1996, sec 28.

V. SUBMISSIONS ON CLAUSE 52 OF THE DRAFT AMENDMENT BILL

- 23 Clause 52 of the Draft Amendment Bill seeks to insert section 117A in the Children's Act to deal with the removal of a name from Part A of the NCPR. The proposed section 117A(2) provides that "an application for the removal of a name and particulars from the NCPR may be made in the prescribed form and manner, a) to the Registrar of the NCPR, if the Registrar is satisfied that the entry was made in error; or b) to any court, including a Children's Court, if the Registrar of the NCPR refuses an application in terms of paragraph (a)".
- 24 We welcome the inclusion of a section 117A, as we believe that this provision will strengthen the integrity of the NCPR and the broader victim-centred objectives of the child protection system. A victim-centred approach emphasises the safety, dignity, and well-being of children who have experienced. The NCPR is only effective if its information is accurate and credible, and erroneous entries undermine the NCPR's reliability. By ensuring that only accurate and lawful entries remain in Part A of the NCPR, the provision helps maintain a trustworthy and effective tool for protecting vulnerable children.
- 25 However, we are concerned with the wording of section 117(2) in that it creates legal uncertainty. The way in which it is currently worded, it appears that a person may only apply for the removal of their name in Part A, if the Registrar is already satisfied that the entry was made in error. This creates confusion regarding the intended procedural order, as it is unclear whether a person may only submit an application after the Registrar has determined that an error occurred, or the provision is intended to mean that a person may apply for

removal, and the Registrar must then consider the application and decide whether the entry was made in error.

26 Secondly, the wording also raises another point of ambiguity as to whether a person may can apply for the removal of their name in Part A in circumstances other than an erroneous entry. The new section 117A introduces a limited removal mechanism for Part A of the NCPR, as it permits removal only where a Registrar is satisfied that the entry was made in error, or where a court orders removal after the Registrar refuses such an application.

27 This limited wording creates uncertainty about whether the legislature intended to exclude all other bases for removal, such as rehabilitation, or the passage of time or changed circumstances, which are expressly recognised in relation to Part B under section 128 of the Principal Act.

28 When the NCPR is accurate and well-managed, it better serves the primary purpose of promoting the safety, dignity, and rights of child victims, and enables the State to fulfil its heightened duty to protect those who are the most vulnerable.

VI. SUBMISSIONS ON CLAUSE 56 OF THE DRAFT AMENDMENT BILL

29 Section 123 of the Children's Act sets out the consequences of the entry of a me in Part B of the NCPR. We note, with great concern, the proposed amendment clause 56(4) and section 124(1) (d) of the Children's Act. Clause 56(4) provides that SAPS may not allow a person whose name appears in Part B of the NCPR to work in a unit of the SAPS tasked with child protection in a capacity that brings him or her into contact with children, unless evidence to the contrary is provided.

- 30 In our view, this clause creates an absurd situation where one's name appears on Part B of the NCPR but can escape the consequences of such an entry. This would defeat the purpose of Part B of the NCPR¹² and undermines the protections intended for children, under no circumstances should anyone whose name appears in Part B of the NCPR be able to provide evidence that has the effect of exempting them from the consequences set out in section 123 of the Children's Act. If such evidence exists, we are of the view that the affected person has a remedy in terms of section 128 of the Children's Act and must follow the procedure set out to remove their name from Part B of the NCPR.
- 31 We further note the various amendments made in relation to employment within the SAPS by expanding the units and activities in which persons whose names appear in Part B of the NCPR may not be employed. Whilst we acknowledge that these amendments are proposed to strengthen the protection of children, we are concerned that it is even possible for people whose names appear in Part B of the NCPR to be employed by the SAPS in any capacity.
- 32 In our view, this position ignores the power dynamics at play in child abuse and the fact that perpetrators often use their authority and standing in the community to manipulate and coerce their victims. It further ignores the fact that child abuse by public officials does not always (or only) take place in the line of duty. In most instances, it takes place outside the abuser's workspace, but with the abuser still able to exert their authority over them. Generally,

¹² The purpose of Part B of the Register is to have a record of persons who are unsuitable to work with children and to use that information to protect children in general against abuse from these persons.

children consider members of the SAPS, regardless of their office, as trustworthy persons who have irrefutable/unquestionable authority over them. This makes children even more vulnerable to abuse by persons whom they perceive, rightly or otherwise, to have authority over them. As such, allowing persons whose names have been recorded in Part B of the NCPR to be employed by the SAPS may have the unintended effect of indirectly allowing abusers access to children.

- 33 Moreover, considering the circumstances which led to the inclusion of names in Part B of the NCPR,¹³ and the special role which the SAPS should play in ensuring the security of the state, and especially that of children, it would be inappropriate for anyone whose name has been entered onto Part B of the NCPR to be employed by SAPS. Regardless of the unit a SAPS employee occupies, they are bound by the same standard of conduct and ethics. Amongst others, the SAPS employees are bound to conduct themselves with integrity and to uphold and protect everyone's fundamental rights. An entry into Part B of the NCPR is evidence of failure to meet and uphold these two standards. Therefore, employing a person who has been found unsuitable to work with children would be contrary to the vision and mission of the SAPS and their commitment to ensuring safety and integrity. SAPS officials should be trusted at all times, and not red-flagged as a risk to society.
- 34 We do not support the proposed amendments insofar as they relate to employment within the SAPS. Instead, we recommend substitution of sections

¹³ See sec 120(3) of the Children's Act.

123(1)(d) and 123(4) of the Children's Act to include a provision that bars employment by the SAPS.

VII. CHALLENGES WITH THE NATIONAL REGISTER FOR SEX OFFENDERS

- 35 While we welcome the designation and establishment of a Registrar for the NCPR, lessons from the NRSO implementation under the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007¹⁴ ("SoRMA") reveal systemic challenges that could also undermine the effectiveness of the proposed Registrar for the NCPR if not addressed.
- 36 The NRSO relies on manual processes, which involve multiple departments and cause delays in vetting and compliance checks. For example, schools send requests through district offices, which then liaise with SAPS and the DoJ.¹⁵ We are concerned that if the NCPR Registrar relies on similar systems, this could cause delays in vetting and compliance checks.
- 37 To avoid the inefficiencies that plagued the NRSO, the NCPR Registrar should adopt a digitised and centralised system for vetting requests. Instead of relying on manual submissions, the enquiries should be submitted directly through a secure and effective online portal. This system could be integrated with SAPS and the DoJ databases to allow for automated checks. This would reduce delays caused by interdepartmental communication and coordination.

¹⁴ Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007.

¹⁵ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fpress-admin.voteda.org%2Fwp-content%2Fuploads%2F2024%2F11%2FFINAL-GDE-PRESENTATION-TO-EPC-MEETING-ON-VETTING100.pptx&wdOrigin=BROWSELINK> (Accessed 11 November 2025).

- 38 The Centre for Child Law (“CCL”) has signified that the NRSO may be underfunded, which then affects its ability to maintain accurate records.¹⁶ Furthermore, the Registrar of the NRSO lacks the capacity and resources to manage the volume of work required. This includes updating records, processing applications for removal, and responding to inquiries timeously.¹⁷ This has therefore resulted in delays and inefficiencies in the NRSO implementation.¹⁸ The volume of the work required and functions of the Registrar for NCPR are not distinct from those of the NRSO Registrar. We are therefore concerned that if the Registrar of the NCPR encounters similar resource and capacity constraints as the NRSO Registrar, the NCPR’s effective implementation may be compromised.
- 39 The NCPR Registrar should be supported by a dedicated and sufficient budget to prevent resource constraints that undermine the NRSO. Adequate funding should be allocated not only for staffing, but also for modern infrastructure that can effectively handle large volumes of applications, removals, and enquiries.
- 40 Systemic data issues have undermined the NRSO’s implementation. Section 50 of the SoRMA places obligations on SAPS, Correctional Services, and the Department of Health (“DoH”) to provide historic conviction data to the Registrar.¹⁹ However, these departments have not complied with the section.

¹⁶ Centre for Child Law, ‘Submissions on the Sexual Offences Amendment Bill’ (8 October 2020), page 3 <<https://centreforchildlaw.co.za/wordpress21/wp-content/uploads/2021/02/2020.10.08-Final2-CCL-Submissions-Sexual-Offences-Amendment-Bill%5EJ-2020.pdf>> (Accessed 12 November 2025).

¹⁷ Action Society, ‘National Register for Sex Offenders: The Good, The Bad and The Ugly’ (Action Society, 2023) <<https://actionsociety.co.za/national-register-for-sex-offenders-the-good-the-bad-and-the-ugly/>> (Accessed 12 November 2025). Also see <https://www.bing.com/ck/a?!&p=6251eb9d9c8759c25d862fb7963010be20cf69d60de56c00bde58ae1ea0168f7JmldHM9MTc2MjkwNTYwMA&pntn=3&ver=2&hsh=4&fclid=270abf6f-ff76-6ef7-217b-aa01fe766fc2&psq=functions+of+the+NRSO+registrar&u=a1aHR0cHM6Ly9wbWcub3JnLnphL2ZpbGVzLzlxMDMxN05SU09fUFJFU0VOVEFUSU9OX0ZPUi9QVQVJMSUFNRU5ULnBwdHg> (Accessed 13 November 2023).

¹⁸ Action Society (note 17 above).

¹⁹ Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007, sec 50.

They have also reported that their legacy systems did not collect the disaggregated data required for the NRSO. Because of this, tracing historic convictions has been slow and often manual, resulting in delays and an increased risk of inaccuracies.²⁰ We are concerned that if similar weaknesses occur in the NCPR, they could compromise the Registrar's ability to maintain accurate and reliable records.

- 41 Given the above highlighted systemic data issues, investment in modernising legacy systems is essential to ensure that disaggregated conviction data is captured in formats compatible with the NCPR. This modernisation should involve upgrading departmental databases within SAPS, Correctional Services, and the DoH so that they can generate and share accurate, disaggregated conviction records in expeditiously.

VIII. ACCOUNTABILITY AND TRANSPARENCY MECHANISMS FOR THE NATIONAL CHILD PROTECTION REGISTER

- 42 The Draft Amendment Bill does not propose accountability and collaboration mechanisms, with other key role players responsible for maintaining the NCPR, who are essential to ensure its efficiency.
- 43 Section 4(1) of the Principal Act states that organs of state in the national, provincial, and local spheres of government must implement the regulations and specific provisions of this Act in an integrated, coordinated, and uniform manner.

²⁰ Department of Justice and Constitutional Development, 'SORMA Report 2019–2020', page 41 <https://www.justice.gov.za/vg/sxo/SORMA-Report-2019-2020.pdf> (Accessed 13 November 2025).

- 44 Additionally, Section 5 of the Principal Act provides for inter-sectoral collaboration of all organs of state, which are involved with the care, protection, and well-being of children. Must cooperate in the development of and uniform approach aimed at coordinating and integrating the services delivered to children.
- 45 The necessity for collaboration is further underscored in the 2012 Presentation to the Portfolio Committee on Social Development. In this presentation, the DSD and DOJ&CD highlighted that a coordinated interdisciplinary, multi-sectoral approach was required to address violence and abuse against children in South Africa.²¹
- 46 The 2012 presentation highlights that various stakeholders, such as the DBE, SAPS, DoH, Department of Correctional Services, Child Protection organisations, Municipalities, and Disciplinary Fora have a role to play in the maintenance and implementation of the NCPR.²²
- 47 Section 125(2), 126(1)(a), 126 (1)(d), and 126(2)(a) of the Principal Act place an obligation on the DBE and PEDs to have access to Part B of the NCPR and to vet prospective educators against the NCPR. In terms of section 125(2) of the Principal Act, PEDs are granted access to Part B of the NCPR, to ensure that a person's name who is listed in Part B cannot be employed to work in schools.²³

²¹ The National Child Protection Register Departments of Social Development & Justice & Constitutional Development, Presentation to Portfolio Committee on Social Development, 15 May 2012, <https://www.bing.com/ck/a?!&&p=9a05017eac5fc6913496a03138af42cf2622e805523a68313d466c35e0a4facfJmItDHM9MTc2Mjk5MjAwMA&ptn=3&ver=2&hsh=4&fclid=23b5989f-d6d5-6fdf-31e8-8d2ad7f66eb9&psq=national+child+protection+register+reports&u=a1aHR0cHM6Ly9zdGF0aWMucG1nLm9yZy56YS9kb2NzLzEyMDUxNW5wY3ltZW50dC5wZGY> , (Accessed 13 November 2025).

²² Ibid, page 15.

- 48 Section 126(1)(a) of the Principal Act provide that before a person is allowed to work with or have access to children at an institution providing welfare services to children, such as a school, the person managing or operating such institution must establish whether or not that person's name is in Part B.
- 49 Section 126(1)(d) of the Principal Act provides that before a person is allowed to be employed in terms of the Public Service Act, in a position where such person has access to children, the head of state department in which such person is employed must determine whether their name appears on Part B of the NCPR.
- 50 Similarly, SACE is also an important role player in ensuring that educators are vetted. In terms of section 5(a) of the SACE Act 31 of 2000 places an obligation on SACE to keep a register of educators.²⁴ Section 5(c) read with section 23 of the SACE Act provides that SACE has a responsibility to remove educators when an educator is held in breach of professional ethics. SACE should conduct vetting of educators before placing the educators on their educator roll of educators.²⁵
- 51 The Registrar must work alongside the DBE to ensure that the NCPR is efficiently utilised for vetting prospective employees at schools and reporting all perpetrators found guilty of sexual misconduct. Without robust inter-departmental collaboration, the NCPR cannot function effectively, which may compromise child protection efforts. Strengthening collaboration and

²⁴ South African Council for Educators Act 31 of 2000.

²⁵ Ibid, secs 5(c) and 23.

accountability mechanisms among all the relevant stakeholders is therefore critical for safeguarding children.

IX. CONCLUSION

- 52 We welcome the designation of a Registrar for the NCPR as a progressive step toward strengthening child protection systems. Our submissions emphasise that the NCPR Registrar must be empowered to ensure efficiency, and in doing so, the Director-General must appoint a suitable and qualified Registrar. We further submit that clause 52 must be clarified to avoid legal uncertainty and to ensure that applications for removal from Part A of the NCPR are fairly processed in line with the victim-centred objectives of child protection.
- 53 Drawing lessons from the management of the NRSO, our submissions have highlighted the risks of manual processes, under-resourcing, and systemic data gaps. To avoid these risks, we recommend digitisation, adequate funding, and modernised systems to ensure accuracy and timely reporting.
- 54 Lastly, we emphasise that strong collaboration, coordination, and accountability among the DSD, DBE, PEDs, SACE, ELRC, and other stakeholders are important to ensure that the NCPR is effectively maintained and implemented to safeguard children's rights.
- 55 SECTION27 would welcome the opportunity to make oral submissions. Should you require any further information, kindly contact:

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