



THE NATIONAL

CHILD LABOUR PROGRAMME OF ACTION FOR SOUTH AFRICA

PHASE THREE:
2013 - 2017





CHILD LABOUR PROGRAMME OF ACTION



PHASE THREE: 2013 - 2017



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*For more information contact:
The Director: Employment Standards
Department of Labour
Private Bag X 117
Pretoria. 0001
South Africa
Tel: 012 3094119*

The Child Labour Programme of Action (CLPA) is a national partnership initiated by Government, Civil Society partners comprise organised business, organised labour and non-governmental organisations. The lead department is the Department of Labour.

**This document was drafted under the auspices of, and endorsed by the
Implementation Committee (IC) of the CLPA, South Africa**

Chair of the IC: Department of Labour

Department of Environmental Affairs, Department of Correctional Services, Department of Energy, Department of Basic Education, Department of Home Affairs, Department of Health, Department of International Relations and Cooperation, Department of Justice & Constitutional Development, Department of Labour, Department of Rural Development & Land Affairs, Department of Public Works, Department of Social Development, Department of Transport, Department of Trade and Industry, Department of Water Affairs, Department of Women, Children and People with Disabilities, National Prosecuting Authority, National Treasury, SA Police Service / Department of Safety & Security, Statistics South Africa.
Organised Labour: Congress of South African Trade Unions (COSATU); Federation of Unions of South Africa (FEDUSA); National Council of Trade Unions (NACTU)
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Other: Programme on Reducing Exploitive Child Labour in Southern Africa (RECLISA); Activists Networking Against the Exploitation of Children (ANEX)
International organisation: International Labour Organisation (ILO)

This document is a revision and update of the CLPA 2008 – 2012. This document is subject to costing and may be amended in the process.



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ABBREVIATIONS USED

BCEA	Basic Conditions of Employment Act	LFS	Labour Force Survey
CLIG	Child Labour Inter-sectoral Group	LG	Local Government
CLPA	Child Labour Programme of Action	NACCA	National Action Committee for Children affected by HIV and AIDS
CSEC	Commercial sexual exploitation of children	NEDLAC	National Economic Development and Labour Council
CSG	Child Support Grant	NGOs	Non-Governmental organisations
CUBAC	Children used by adults to commit crime	NPA	National Prosecuting Authority
DA	Department of Agriculture	NT	National Treasury
DBE	Department of Basic Education (national)	ORC	Office on the Rights of the Child
DEAT	Department of Environment and Tourism	OVCs	Orphans and vulnerable children
DIRCO	Department of International Relations and Cooperation	PDE	Provincial Department(s) of Education
DOC	Department of Communications	PDLA	Provincial departments responsible for local Government
DCS	Department of Correctional Services	PPO	Provincial Premiers' Offices
DOH	Department of Health	RI	Research institutions
DHA	Department of Home Affairs	SALRC	South African Law Reform Commission
DOJ and CD	Department of Justice and Constitutional Development	SAPS	SA Police Service / Department of Safety and Security
The DOL	Department of Labour	SARS	South African Revenue Services
DME	Department of Minerals and Energy	SASA	South African Schools Act
DPLG	Department of Provincial and Local Government	SASSA	South African Social Security Agency
DPW	Department of Public Works	SAYP	Survey of Activities of Young People
DOA	Departments responsible for agriculture (national and provincial)	SOCA	Sexual Offences and Community Affairs Unit of the National Directorate of Public Prosecutions
DSD	Department of Social Development	StatsSA	Statistics South Africa
DSDLR	Department of Rural Development and Land Reform	TU	Trade union
The DT	Department of Transport	UNDP	United Nations Development Programme
DTI	Department of Trade and Industry	UNESCO	United Nations Educational, Scientific and Cultural Organisation
DWA	Department of Water Affairs	UNICEF	United Nations Children's Funds
ECC	Employments Conditions Commission	USAID	United States Agency for International Development
ECD	Early Childhood Development	WFCL	Worst Forms of Child Labour
EPWP	Expanded Public Works Programme	WSDP	Water Services Development Plan
IC	Implementation Committee	WP6	White Paper 6 on inclusive education (DBE)
ILO	International Labour Organisation		
IOM	International Organisation on Migration		
ISCCJ	Inter-sectoral Committee on Child Justice		
JCPS	Cluster – Justice and Correctional Services cluster of Government Departments		

'Departments responsible for' in the above list means national and provincial departments sharing the responsibility for the relevant line function. These are usually where the Constitution specifies that the given function is a concurrent one between national and provincial Government.





INTRODUCTION

The Child Labour Programme of Action (CLPA) is South Africa's roadmap towards the prevention, reduction and eventual elimination of child labour. The CLPA was first adopted in 2003 after extensive consultation within government, with a wide range of organisations outside government and with groups of teenage children involved in different forms of child labour. The Programme set out specific actions to be taken and assigned responsibility for these actions.

The second phase of the CLPA, which was adopted by Cabinet on 4 February 2009, covers the financial years 2008/09 to 2012/13.

The third phase of the CLPA will cover the period April 2013 to March 2017.

The report to Cabinet on progress on CLPA Phase 2, which was adopted by Cabinet in September 2012, noted that there were a substantial number of steps for which agencies reported no progress. There were many other steps for which the submissions revealed only partial achievement. The progress report thus suggested that, given the large number of steps in the existing CLPA, it would be wise to be cautious before adding any further steps for Phase 3.

Instead of adding new steps, the main emphasis in the revision and updating of the CLPA was therefore placed on determining the reasons for non-completion of existing steps, amendment of steps where there were good reasons for doing so, and improvement of monitoring to ensure that progress is made on the non-completed steps. There were also several steps that could fall away because they had been completed. Each government agency with responsibilities under the CLPA was asked to consider these issues and propose amendments to the relevant action steps.

The report to Cabinet further noted that Government had performed relatively well in the areas of awareness raising, training, and development of materials, as well as in respect of some legislation and regulations. However, evidence of performance in relation to service delivery and implementation of what had been imparted in the various training initiatives was less consistent. For CLPA 2013-2017 government agencies were therefore asked to focus on service delivery and implementation. Going forward, this focus should, if possible, be accompanied by development of delivery indicators (such as the number of children to whom services were provided) for all steps that involve ongoing service delivery.

The revision of the CLPA aimed to come up with a set of action steps that:

- Are "do-able" within the period April 2013 to March 2017
- Will make a "direct" difference for children engaged, or at risk of being engaged, in child labour
- Prioritise according to the seriousness of the issue being addressed and the likely impact of the action step.

The first bullet point means that the CLPA is not a wish list, but instead is a list of actions that government agencies commit to undertaking, will do their best to achieve, and for which they will take responsibility if there is non-achievement.

The second bullet point means that the CLPA does not include steps that have an indirect impact. For example, while poverty is the main cause of child labour in South Africa, the CLPA does not include all the steps that Government plans to take for poverty alleviation and poverty eradication.

The third bullet means that action steps that address (a) a worst form of child labour or (b) a form of child work that affects a large number of children or (c) child work/labour that affects children who are disadvantaged in other ways have been prioritised. Steps that have already been taken but that need to continue remain in the CLPA.

The CLPA for 2012-2017 focuses on action steps for which government agencies are responsible. The original CLPA and CLPA Phase 2 also specified steps for which non-government agencies were responsible, such as business, trade unions, and non-governmental organisations. All these actors can play important roles in addressing child labour in South Africa. But they are not included in the action steps because Government cannot make commitments on their behalf.

The pages that follow list all the proposed action steps of CLPA Phase 3. The action steps are listed under the "lead agency" for that step. The action steps have been renumbered so as to indicate the lead agency. The appendix contains a table showing, for each agency, all the action steps for which it is either the lead institution or an institution with secondary responsibilities.

The first category of action steps includes two steps which are applicable to all agencies. These steps relate to budgeting and reporting.



Action steps listed by Lead Institution

All Agencies	
Step	Description of action step
ALL1	All agencies with action steps will ensure that the necessary funds for the steps are included in their annual budgets. Agencies will not agree to action steps that are not financially feasible. Lead institution: NT.
ALL2	All agencies will continue to report on a quarterly basis to the Child Labour Implementation Committee on progress in implementing action steps for which they are responsible. Lead institution: DOL.

Department of Correctional Services (DCS)	
Step	Description of action step
DCS1	Policy will be formulated on when children deprived of their liberty may be required to work, and when such work should be remunerated. Lead institution: DCS (prisons), PDE/DSD (reform schools).

Department of Environmental Affairs (DEA)	
Step	Description of action step
	Scavenging
DEA1	The National Waste Management Act and related regulations will be amended to (a) prevent children from accessing sites, and holding landfill site managers accountable in this regard; (b) ensure that through law and policy scavenging / informal salvaging on waste sites are recognised, formalised and controlled; and (c) provide a means of ensuring adequate remuneration of salvagers utilised by recycling companies. Lead institution: DEA. Secondary institutions: LG.

Department of Basic Education (DBE), Department of Higher Education and Training (DHET) and provincial departments responsible for education (PDE)	
Step	Description of action step
	Availability and accessibility of schools description of action step
DBE1	The recommendations of the Ministerial Committee on rural education, in respect of farm schools, will be speedily implemented but with due care that children are not denied access to education in the process. Lead institution: DBE.
DBE2	The provision of adequate and safe transport will be strengthened for children living far away from schools. Provinces that are not promoting bicycles as a means of transport for children will be encouraged to do so where appropriate. Lead institution: DBE, PDEs. Secondary institution: DT.
	Curriculum development
DBE3	Information on the specific needs and problems of the various categories of children who are working, the relevant elements of the CLPA and the applicable legislation and policies will be introduced in the training of i) teachers, ii) included in the school curriculum (Life Orientation) and iii) disseminated to curriculum advisers in district offices, managers of schools, teachers and governing bodies. Lead institution: DBE.



Department of Basic Education (DBE), Department of Higher Education and Training (DHET) and provincial departments responsible for education (PDE)	
Step	Description of action step
Funding and fees	
DBE4	Implementation of the national school fee policy in respect of no-fee schools and exemptions will be monitored. Lead institution: DBE.
Awareness-raising	
DBE5	The DBE, DHET and PDE will create awareness within the education environment on the content of relevant action steps including: children should engage in school-related labour only to the extent required to build a sense of responsibility and collectivity; teachers and principals should not use learners to clean their houses; special educational measures for children who are subject to compulsory schooling and who have lost a lot of schooling; special classes, courses and facilities such as ABET and FET for children who are not subject to compulsory schooling and who have left school. Lead institution: DBE, DHET.
School nutrition programme	
DBE6	The National School Nutrition Programme will be strengthened and extended to secondary schools serving poor communities. Lead institution: DBE.
Vulnerable groups	
DBE7	The principal of a school will be given the responsibility to i) identify children who are frequently absent from school and in need of care and protection, ii) give their names and addresses to the provincial head of social development for further support to be provided and iii) establish School Based Support Teams or help establish district support teams to render assistance to vulnerable children, such as assisting them to access social grants and to apply for exemption from school fees. Lead institution: DBE, PDE
DBE8	Special education centres or classes within the regular school setting; access to ABET classes; or access to FET schools / colleges will be provided for children under 18 years who have left school in order to work and find it difficult to return to mainstream schools. Lead institution: DBE, DHET.
DBE9	Support will be provided while the child is on the street through remedial teaching whereby children can gradually be phased into or back to the education system. Lead institution: PDE.
Work detrimental to schooling	
DBE10	Systems for monitoring and follow-up of absenteeism and drop out will continue to be improved so that, amongst others, these can be used as a way of identifying possible cases of child labour. Lead institution: DBE: Secondary institution: DSD.
DBE11	Policy will be developed to ensure that children engage in school-related labour only to the extent required to build a sense of responsibility and collectivity. Such work should never be done in school time and should be limited in duration. Lead institution: DBE.

Department of International Relations and Cooperation (DIRCO)	
Step	Description of action step
Trafficking of children	
DIRC1	Relevant departments will make use of the regional mechanism being developed under the auspices of the Southern African Development Community to maintain regular contact with relevant stakeholders in other countries in the region to deal with trafficking operations and victim assistance. Lead institution: DIRCO. Secondary institutions: SAPS, DSD, NPA.



Department of Health (DOH)	
Step	Description of action step
	HIV/AIDS
DOH1	Fieldworkers for all home- and community-based care programmes will be trained to recognise the problems children face in HIV and AIDS-affected households, and link them up with the necessary assistance services. Lead institution: DOH, Secondary institutions: Provincial DSD, COGTA, LG.
** See Step DSD10	

Department of Justice and Constitutional Development (DOJ)	
Step	Description of action step
	Children used by adults to commit crime
DOJ1	Training materials and programmes of law enforcement agencies will be adapted to prime them to seek and prosecute adults using children or benefiting from children's illegal activities. An assessment is also necessary as to whether there are sufficient opportunities within existing training programmes to present such training and, if not, such training sessions will be extended. Lead institution, investigations: SAPS. Lead institution, prosecution: DOJ.
DOJ2	Training on CUBAC will be integrated in departmental and judicial training initiatives, including integrating a restorative justice approach. Lead institution: DOJ. Secondary institutions: NPA, SAPS, DSD, DCS.
DOJ3	The Inter-Sectoral Committee on Child Justice will monitor the implementation of CUBAC action steps. Lead institution: DOJ.
DOJ4	Statistics on CUBAC will be captured as part of the Integrated Justice System. Records needs to be kept by, inter alia, Bosasa, diversion service providers and DSD. Lead institution: DOJ. Secondary institutions: DCS, DSD, SAPS.
	Commercial sexual exploitation of children
DOJ5	The DOJ will coordinate assessment of the feasibility of the non-legislative action steps to address CSEC proposed by the SALRC, and facilitate agreement between line departments and non-governmental organisations on responsibilities, actions and timeframes for implementation and monitoring arrangements. Lead institution: DOJ. Secondary institutions: NPA, SAPS, DSD.
	Commercial sexual exploitation of children
DOJ6	The DOJ will ensure that the passing of a Trafficking Act is treated as a priority. Lead institution: DOJ.
** See Step SAPS2	

Department of Home Affairs (DHA)	
Step	Description of action step
	Social assistance grants
DHA1	The Department of Home Affairs will continue to ensure that enabling documents such as identity documents and birth certificates are available to all citizens and permanent residents of South Africa so as to assist them in accessing basic services such as education, health, justice, old age pension, foster care, disability and child grants as well as employment. Lead institution: DHA.



Department of Labour (DOL)	
Step	Description of action step
Child trafficking	
DOL1	DOL will, as part of its monitoring of employment agencies, check when and where trafficked children are provided for domestic work and other occupations and utilise enforcement procedures where necessary. Lead institution: DOL.
Domestic work and chores	
DOL2	Guidelines will be drafted on kinds of household chores that are acceptable (depending on age groups), and reasonable amounts of time children should spend on them. Lead institution: DOL. Secondary institution: DSD.
General measures	
DOL3	Labour inspectors will continue to receive training on how to address child labour. Lead institution: DOL.
DOL4	DOL will coordinate a four-yearly report entitled "State of Child Labour in South Africa". Lead institution: DOL.
Legislation	
DOL5	DOL will continue to conduct inspections and strengthen enforcement of all legislation, including sectoral determinations, in respect of child labour. Lead institution: DOL.
Monitoring and evaluation	
DOL6	Progress on the CLPA will be monitored through quarterly reporting to the Implementation Committee by all agencies for action steps for which they are responsible. Each agency will also submit an annual report on progress in respect of each agency, and these reports will be consolidated into a government-wide annual report of progress in implementation. Lead institution: DOL.
Public awareness-raising	
DOL7	The National Day Against Child Labour will be commemorated on an annual basis. Lead institution: DOL.
Taxi sector	
DOL8	Inspectors will ensure that taxi owners do not employ children under 16 in the industry and that they ensure that their driver and other employees also do not employ such children as car washers and assistants. Lead institution: DOL.
Training and capacity building of other stakeholders	
DOL9	Labour inspectors will continue to receive training on how to address child labour. This will include training targeting specifically vulnerable or difficult sectors, such as the domestic sector. Lead institution: DOL.

Department of Rural Development and Land Reform (DRDLR)	
Step	Description of action step
Bonded labour	
DRD1	Legislation will be amended to ensure that labour tenants cannot nominate minor children to work in their place for a landowner, and to prohibit landowners from demanding that labour tenants nominate their minor children. Lead institution: DRDLR.





Department of Cooperative Governance and Traditional Affairs (COGTA)	
Step	Description of action step
Basic service provision	
COGT1	The programme to provide a minimum of 6 kl per month free water per household will be implemented in municipalities where this is not yet in place. DPLG will provide municipalities with national guidelines to encourage a more gradual increase in tariffs after the free 6 kl. Lead institution: COGTA. Secondary institutions: LG, DWA.

Department of Social Development (DSD) and provincial departments	
DSD refers to the National Department of Social Development. Provincial DSD is the abbreviation used for departments responsible for social development.	
Step	Description of action step
Children used by adults to commit crime	
DSD1	Standardised assessment forms will be made available in all provinces with CUBAC risk factors incorporated. Lead institution: DSD.
Commercial sexual exploitation of children	
DSD2	Within DSD as lead department on CSEC, the Directorate: Child Protection will be responsible for coordination of all CSEC-related services and activities of concerned departments and institutions. Lead institution: DSD.
DSD3	Existing shelters rendering services to children involved in or at risk of CSEC will be transformed into and registered as child and youth care centres by 30 March 2014. Sufficient beds will also be made available to children, even if they do not have proper ID documentation. Lead institution: DSD.
Health and safety	
DSD4	Children will be removed from hazardous work. Children who have been removed from such work and are not living with caring adults must be reintegrated with their families, if possible. When removed from such work it will be ensured that children are better off, i.e. that lost income is replaced by access to social grants in the family. Lead institution: DSD. Secondary institution: DOL.
Identification of children needing assistance	
DSD5	Appropriate systems will be set in place to monitor the services to vulnerable children, to ensure appropriate transfer of children between involved departments and institutions, and to encourage collaboration between the departments and institutions and the provision of integrated services. Lead institution: DSD. Secondary departments: DOH, provincial DSD, DOL, PDE, DHA, SAPS.
DSD6	Ongoing intersectoral training will be provided for officials of provincial DSD, DOH, DOL, PDE and DHA in ways of detecting potentially serious cases of child labour and what action to take when it is found. Lead institution: DSD.
Monitoring and evaluation	
DSD7	Part A of the Child Protection Register of the DSD will be reviewed and amended if necessary to record details of children found in child labour and thus provide the basis for monitoring, identification of patterns and trends, planning and budgeting. Lead institution: DSD.



Department of Social Development (DSD) and provincial departments	
	DSD refers to the National Department of Social Development. Provincial DSD is the abbreviation used for departments responsible for social development.
Step	Description of action step
Provision of childcare facilities	
DSD8	Appropriate strategies will be found for provision of childcare facilities, especially in sectors and areas where children often have to look after their younger siblings. Lead institution: DSD. Secondary institutions: PDE (grade R), LG (regarding crèche facilities funded or provided by local authorities).
DSD9	The implementation of the social sector EPWP will be speeded up and extended in areas found to have a severe shortage of ECD facilities. Lead institution: DSD.
DSD10	Children and their households affected by HIV and AIDS will be assisted through provision of home-and community-based care programmes that can assist with the care of the ill or dying parent / caregiver and provide psycho-social support for children and other family members. Lead institutions: DSD and DOH.
Illegal immigrant and refugee children	
DSD11	All children, including refugee children will be provided with needed social and other services. Refugee children, like other children, will not be arrested unless in conflict with the law. Children in conflict with the law will be assisted by a probation officer and placed in a secure care facility or diversion programme. Lead institution: DSD. Secondary institutions: DHA, SAPS, PDE, DOH.
DSD12	The International Social Service will assist illegal immigrant children in locating their families or relatives in South Africa or their country of origin. If illegal immigrant children are to be repatriated their rights will be respected including through provision of caring services while they wait for repatriation. If they are not repatriated the provincial DSD is responsible for their appropriate placement. Officials of the Departments of Home Affairs, Social Development, Education, Health and the SAPS will be trained regarding children's rights and needs and apply these even if the children are illegal immigrants. Lead institution: DSD. Secondary institutions: DHA, DBE, DOH, SAPS.
Street children	
DSD13	The draft policy for children living and working on the streets will be finalised and put before Parliament. Lead institution: Provincial DSD. Secondary institutions: SAPS, DBE, DHA.
DSD14	Designated social workers employed by the state or registered non-profit organisations will assist with the reintegration of street children through child and youth care centres. Sufficient state support will be provided to child and youth care centres to provide the necessary services. Lead institution: Provincial DSD.
Trafficking of children	
DSD15	DSD will review its strategy on repatriation of victims of trafficking, including provision of appropriate reception and care centres. Lead institution: DSD. Secondary institutions: SAPS, DIRCO, DHA, NPA.
Children's Act	
DSD16	Children in child labour, including those in Worst Forms of Child Labour, will be dealt with in terms of the Children's Act and accompanying guidelines for practitioners. Lead institution: DSD.



Department of Trade and Industry (DTI)	
Step	Description of action step
Liquor legislation and regulation	
DTI1	The DTI will take steps to ensure that provincial liquor legislation is in line with the objective of the National Liquor Act and, in particular, does not undermine the provisions in respect of child labour. The DOL will provide technical support to the provincial liquor boards to review and where necessary revise the legislation with respect to the employment of children. Lead institution: DTI. Secondary institutions: DOL, provincial liquor authorities.
DTI2	The DTI, in collaboration with the DOL and SAPS, will develop an action plan to monitor 'hotspots'; the strategy should initially target shebeens/taverns where children are believed to be involved in commercial sexual work and in the illicit sale of drugs. Lead institution: DTI. Secondary institutions: DOL, SAPS.

Department of Transport (DT)	
Step	Description of action step
School transport	
DOT1	The Department of Transport will investigate the provision of transport facilities to children from far-flung areas where schools are not available and / or easily accessible to schools in nearby towns. Lead institution: Department of Transport. Secondary institutions: DBE, PDE.

Department of Water Affairs (DWA)	
Step	Description of action step
Basic service provision	
DWA1	DPLG will develop training, manuals and guidelines on the Water Services Development Plan/Integrated Development Plan process that will encourage the prioritised provision of basic water and energy services to households facing the biggest difficulties. These documents will also highlight the problems faced by households far from such resources and time taken by household members (including children) in fetching them. Lead institution: DWA. Secondary institutions: LG (implementation), COGTA (infrastructure funding), DEN (basic energy services).

Department of Women, Children and People with Disabilities (DWCPD)	
Step	Description of action step
Advocacy, monitoring and evaluation	
DWC1	DWCPD will incorporate child labour in undertaking its advocacy, monitoring, evaluation and reporting responsibilities in respect of children's rights more generally. Lead institution: DWCPD. Secondary institution: DOL as lead agency for the CLPA.



National Prosecuting Authority (NPA)	
Step	Description of action step
Trafficking of children	
NPA1	A directive will be issued to all prosecutors that trafficking and other worst forms of child labour should be viewed seriously. Trafficking will be added to the existing list of serious crimes. Lead institution: NPA.
NPA2	The NPA will take responsibility for a process of agreeing to standard procedures within the region for the extradition of foreign traffickers for prosecution or prosecution according to SA law. Lead institution: NPA. Secondary institutions: DOJ, DHA, DSD and DIRCO.
NPA3	The quality and content of training on the prevention of trafficking, prosecution of traffickers and protecting the rights of victims, including and especially child victims, for law enforcement personnel, immigration and customs officials, prosecutors and judges, as well as other relevant officials and non-governmental stakeholders will be improved. Lead institution: NPA. Secondary institutions: DOJ, SAPS, DHA, provincial DSD (by addressing trafficking and child labour more generally in their training materials programmes).

South African Police Services (SAPS)	
Step	Description of action step
Support for other government officials	
SAPS1	SAPS will provide more effective protection for labour inspectors and social service workers where their safety is threatened. Full and regular access for inspectors and social service workers should also be facilitated through buy-in by organisations of farmers and other employers. Lead institution: SAPS. Secondary institution: DOL.
Training and capacity building	
SAPS2	Training materials and programmes of law enforcement agencies will be adapted to prime them to seek and prosecute adults using children or benefiting from children's illegal activities. Lead institution, investigations: SAPS. Lead institution, prosecution: DOJ.
Trafficking of children	
SAPS3	SAPS, DSD and DHA will develop guidelines and procedures to enable the rapid and accurate identification and treatment of trafficked persons and children. Lead institution: SAPS. Secondary institution: DSD, DHA.
** See Step DOJ1	

Statistics SA (StatsSA)	
Step	Description of action step
Monitoring and evaluation	
SSA1	Regular follow-up surveys to the SAYP will be conducted. Lead institution: StatsSA. Secondary institution: DOL.



The Child Labour Programme of Action (CLPA) is South Africa's roadmap towards the prevention, reduction and eventual elimination of child labour.



Appendix: Action steps for which each agency has responsibilities

STEP	COGTA	DBE	DCS	DEA	DEN	DHA	DHET	DIRCO	DOH	DOJ	DOL	DOT	DRDLR	DSD	DTI	DWA	DWCPD	LG	NPA	SAPS	SSA	STEP
ALL1	X	X	X	X				X	X	X	X	X	X	X	X	X			X		X	ALL1
ALL2	X	X	X	X				X	X	X	X	X	X	X	X	X			X		X	ALL2
DCS1		X	X											X								DCS1
DEA1				X														X				DEA1
DBE1		X																				DBE1
DBE2		X										X										DBE2
DBE3		X																				DBE3
DBE4		X																				DBE4
DBE5		X					X															DBE5
DBE6		X																				DBE6
DBE7		X																				DBE7
DBE8		X					X															DBE8
DBE9		X																				DBE9
DBE10		X												X								DBE10
DBE11		X																				DBE11
DIRC1								X						X					X	X		DIRC1
DOH1	X								X					X				X				DOH1
DHA1						X																DHA1
DOJ1										X										X		DOJ1
DOJ2			X							X				X					X	X		DOJ2
DOJ3										X												DOJ3
DOJ4			X							X				X						X		DOJ4
DOJ5										X				X					X	X		DOJ5
DOJ6										X												DOJ6
DOL1											X											DOL1
DOL2											X			X								DOL2
DOL3											X											DOL3
DOL4											X											DOL4
DOL5											X											DOL5
DOL6											X											DOL6
DOL7											X											DOL7
DOL8											X											DOL8
DOL9											X											DOL9



STEP	COGTA	DBE	DCS	DEA	DEN	DHA	DHET	DIRCO	DOH	DOJ	DOL	DOT	DRDLR	DSD	DTI	DWA	DWCPD	LG	NPA	SAPS	SSA	STEP
DRD1													X			X		X				DRD1
COGT1	X																					COGT1
DSD1														X								DSD1
DSD2														X								DSD2
DSD3														X								DSD3
DSD4											X			X								DSD4
DSD5		X				X			X		X			X						X		DSD5
DSD6														X								DSD6
DSD7														X								DSD7
DSD8														X				X				DSD8
DSD9		X												X								DSD9
DSD10									X					X								DSD10
DSD11		X				X			X					X						X		DSD11
DSD12		X				X			X					X						X		DSD12
DSD13		X				X								X						X		DSD13
DSD14														X								DSD14
DSD15						X								X					X	X		DSD15
DSD16														X								DSD16
DT11											X				X							DT11
DT12											X				X					X		DT12
DOT1		X										X										DOT1
DWA1	X				X											X		X				DWA1
DWC1											X						X					DWC1
NPA1																			X			NPA1
NPA2						X			X					X					X			NPA2
NPA3						X			X					X					X	X		NPA3
SAPS1											X									X		SAPS1
SAPS2																				X		SAPS2
SAPS3						X								X								SAPS3
SSA1											X											SSA1





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