

Coalition Alternative Report to the UNCRC (Republic of Singapore)

For the 81st session of the United Nations Committee on
the Convention of the Rights of the Child

12/4/2019

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List of abbreviations

AAYS	Appropriate Adult Scheme for Young Suspects
ACA	Adoption of Children Act
AED	Allied Educator
BPC	Beyond Parental Control
CAM	Child Abuse Material
CE	Compulsory Education
CP	Child Protection
CPD	Continuing Professional Development
CPSC	Child Protection Specialist Centre
CRC	Convention on the Rights of the Child
CYP(s)	Child/ Children and Young Person(s)
CYPA	Children and Young Persons Act
ECDA	Early Childhood Development Agency
EIPIC	Early Intervention Programme for Infants and Children
FY	Fei Yue Community Services
IASP	Internet Access Service Provider
LO	Licensing Officer
LTVP	Long-term Visit Pass
MDI	Multi-Disciplinary Interview
MP	Member of Parliament
MSF	Ministry of Social and Family Development
NGO	Non-Governmental Organisation
NMP	Nominated Member of Parliament
PDPA	Personal Data Protection Act
SBB	Subject-Based Banding
SBH	Singapore Boys' Home
SCS	Singapore Children's Society
SEN	Special Educational Needs
SGH	Singapore Girls' Home
SMTA	Short-to-Medium Term Assistance
SHINE	SHINE Children and Youth Services
SPED	Special Education

SSCC Special Student Care Centre
SSSG Sector Specific Screening Guide
VWSP Vulnerable Witness Support Programme

Executive summary

This alternative report is submitted by Fei Yue Community Services (FY), SHINE Children and Youth Services (SHINE) and Singapore Children's Society (SCS) to the Committee on the Rights of the Child for the consideration of Singapore's 4th and 5th periodic reports at its 81st session.

Methodology

The structure of this report mirrors closely the State's periodic report. Inputs to this submission were informed by desk research, case file reviews, ground observations and consultations with social service practitioners. The NGO which has direct work involving a specific area led the discussion while the other two agencies tapped on the expertise of colleagues and partners in related domains to enrich our inputs. SCS consolidated the inputs and coordinated the writing of this report.

Where the State has noted or detailed the recent positive developments in its periodic report and in its response to the list of issues, we have not repeated them. Issues that needed clarification with the State and were reported to be work in progress are flagged up herein. In the course of writing this report, the State was forthcoming in providing information requested.

Our report in short

i. Political commitment- more robust legislative safeguards

The most significant change has been the strengthening of the legal framework for the protection, safety and well-being of children and young persons (CYPs). This is evident in the proposed amendments to the Penal Code and Children and Young Persons Act (CYPA), and follows other progressive measures introduced such as the inclusion of children with special educational needs (SEN) under the Compulsory Education (CE) Act and the continued strong support and resourcing for early childhood development and education.

ii. Roadmap

The Convention on the Rights of the Child (CRC) covers a lot of ground and operationalising it is an extensive and continuous undertaking. Going forward from this review, we hope to see the development of a clear road map that puts all stakeholders on the same page.

As national stakeholders— from the State, businesses, Non-Governmental Organisations (NGOs) to professions working with children— work at different levels through diverse modalities, a roadmap

will enable more coordinated action; determine responsibilities and resources; and initiate strategic actions. For example, knowing that there is not a substantial number of stateless children who are unable to access subsidies for basic services allows for targeted service delivery, avoids duplication among NGOs, and even takes some of the care and support burden off the State.

iii. Data and research

We note that the State has established data.gov.sg, a one-stop public portal that holds datasets across 70 public agencies. This is a good start on the part of the State to coordinate data sharing. We look forward to the launch of the portal and its full suite of features.

Throughout this report, we also pointed to areas where more research would be helpful, including on corporal punishment as a form of discipline; the prevalence of child abuse and neglect; and on the efficacy of the Beyond Parental Control (BPC) programme.

iv. Gaps

This report also calls attention to certain gaps in legislation and regulation, such as in (i) adoption child-matching practices and (ii) temporary shelters for runaway youths without parental consent.

We acknowledge that shortcomings may sometimes arise due to operational kinks rather than policy gaps. For example, while efforts to safeguard children have been enhanced through the adoption of tools like the Sector Specific Screening Guide (SSSG), its implementation for professionals beyond the social service sector remains low.

Finally, the State should continue to encourage CYPs to express their views in matters that affect them. Building an enabling environment that ensures the meaningful participation of CYPs is critical to the formulation of policies and legislation and to identify the barriers to fulfilment. This will also enable CYPs to contribute positively to decisions that affect their own lives as well as their communities and wider society.

Conclusion

NGOs are equal partners in the implementation of the CRC. Planning for the next reporting cycle should commence soon after the completion of the current one. To this end, we look forward to the continuing working relationship with all stakeholders.

Profile of coalition organisations

Fei Yue Community Services (<https://www.fycs.org/>)

Fei Yue Community Services was established in 1996. Our other entity, Fei Yue Family Service Centre, was started in 1991. Casework and counselling was the primary service offered. Today, both entities serve over 150,000 individuals and their families annually, and offer a wide range of services from family and community cohesion programmes, street youth outreach to home nursing for home-bound persons with chronic conditions or disabilities. Our beneficiaries include low-income or disadvantaged families, infants and children with special needs, couples looking to adopt children or to strengthen their marriages, prison inmates and their families, the active and vulnerable seniors, youth-at-risk, communities facing mental health conditions and challenges, and children who face domestic abuse.

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SHINE Children and Youth Services (<http://www.shine.org.sg/>)

SHINE serves more than 5,000 young persons aged 5-21 every year. We aspire to develop their 5Cs' of competence, confidence and character; meaningful connections with their families and society and a sense of care towards others. Additionally, we strive to guide them to steer clear of crimes and keep them positively engaged in school.

Through our four centres strategically located across Singapore, our team of caring professionals work with families, schools, communities, corporations and government agencies to provide services to children and youths in the areas of educational psychology and social work.

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Singapore Children's Society (<https://www.childrensociety.org.sg/>)

Singapore Children's Society protects and nurtures children and youth of all races and religions. In 2018, the Society reached out to 78,433 children, youth and families in need. Established in 1952, our services have evolved to meet the changing needs of children.

Today, Children's Society operates 12 service centres island wide, offering services in the four categories of: Vulnerable Children and Youth, Children and Youth Services, Family Services, and Research and Advocacy.

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I. GENERAL MEASURES OF IMPLEMENTATION

A. Legislation

Observation

1. The State is in the midst of undertaking substantive amendments to the Penal Code. Among the wide-ranging reforms put forward, more protection has been recommended for vulnerable victims of violence and sexual exploitation, including children. In addition, amendments to the Women's Charter in 2016 have provided NGOs with the opportunity to reach out to parents facing disagreements in their divorce, thereby allowing NGOs better access, through the parents, to children who could be affected by acrimonious divorce proceedings.
2. These are positive steps forward in ensuring that the principles and provisions of the CRC are more deeply embedded in the domestic legal system, as recommended in the committee's concluding observations (CRC/C/SGP/CO/2-3).

Adoption

3. Child adoption is primarily regulated by the Adoption of Children Act (ACA). FY, one of the State's accredited agencies for Home Study Reports¹, has encountered service users who spoke of their experiences with adoption agencies which bring in children from neighbouring countries for "viewing" as a prelude to an eventual adoption. These children may be in the care of complete strangers, with the care period ranging from hours to days. In extreme cases, there is a "trial period" for prospective adoptive parents to "try out" adopting a child. Such practices pose a risk to the welfare and safety of these children. FY has highlighted to the State the need to strengthen the regulation of adoption practices and the issue is being looked into.

¹ A Home Study Report is a comprehensive investigation to assess if families are eligible to adopt a child. See <https://www.msf.gov.sg/Adoption/Pages/Apply-for-Home-Study-Report.aspx>

Runaway youths

4. There is no legislation that allows NGOs to provide safe temporary shelters for runaway youths without first seeking parental consent. A study done in 2009 highlighted that about 600 youths run away from home annually when confronted with issues such as conflicts with parents and/or siblings, and at times family violence². FY's case study in Box 1 illustrates the challenges faced by NGOs working with runaway youths.

Box 1. Jane

Jane, 15, ran away from home because of conflicts in her family. She had stayed away from home for nine months when youth workers from FY first came into contact with her at a street outreach activity. She was hanging out with a group of youths whom the youth workers were following up on.

The youth workers learnt that Jane had been asking friends and strangers for money and food, and she had been sleeping in public parks or playgrounds. On a "lucky" day, she would get to sleep over at her friends' place or the homes of men she met.

As the youth workers could not provide a safe place for Jane to reside that evening, they tried to persuade her to go home for safety reasons. Jane did not want to, neither would she disclose her family member's contact details. The youth workers struggled over whether to call the police as they did not want to jeopardise the very thin working alliance with Jane. They also cannot ascertain if Jane was telling lies to test if she could trust them, or if she was suffering from mental health conditions. The youth workers stayed with Jane that evening until she found a female friend who was willing to take her in for the night.

The youth workers met Jane again the next day and established sufficient rapport with her for Jane to reveal that she had been raped on three separate occasions by young adults she had met at shopping malls, and she was worried that she might be pregnant. The youth workers tried to convince Jane to make a police report and seek medical attention but she refused for fear that the police may send her home. The youth workers consulted with the Child Protective Service and the police. Unfortunately no concrete actions could be taken as all the youth workers had were Jane's words.

Without a temporary place to house Jane while they explore intervention options, the youth workers lost touch with her. They learnt later that Jane was admitted into a State-run residential home for girls.

Recommendations

5. Adoption: We welcome the State's current review of the ACA; we hope that it could look into regulating existing matching practices.

² Lana Y.L. Khong. 'Runaway youths in Singapore: Exploring demographics, motivations, and environments', *Children & Youth Services Review*, 31 (2009), 125-139.

6. Runaway youths: The State could look into enacting a legislation to allow NGOs to place runaway youths in temporary shelters. Provisions similar to the “Runaway and Homeless Youth Act” in the U.S. will be helpful.

B. Coordination and National Plan of Action

Observation

7. We note that government agencies are already accountable to meeting measurable and time-bound targets. However, as the CRC covers a lot of ground, the absence of a national plan of action for child rights makes it difficult for NGOs to appreciate the scope, progress and impact of Singapore’s policies relating to children.

Recommendation

8. We urge the State to consider developing an action plan to serve as a roadmap for the advancement of child well-being to guide NGOs, businesses and professions working with children. The roadmap could lay out strategic directions and key milestones to guide these stakeholders who work at different levels through diverse modalities in aligning their services with the broader picture, resulting in a more coordinated effort.

C. Data Collection

Observation

9. The State shares data through data.gov.sg, giving useful data relating to child health development indicators and child abuse investigation statistics. However, as this portal is currently in its public beta stage, we are not sure if requests for additional data which is currently not captured on the portal will be a feature of this system. We have written in to check and will update the Committee on this.

Recommendations

10. We hope that the State will formulate more child well-being indicators consistent with the CRC and collect data that will allow better insights into the state of our children’s well-being. For example, the United States’ National Survey of Children’s Health³ examines positive and strengths-based indicators such as how often a child is read to, and whether the child participates in organised activities/ lessons in school, on top of child health indicators.

³ NSCH is backed by the US’ Department of Health and Human Services. See NSCH’s web portal at <http://childhealthdata.org/>.

11. Examples of child well-being indicators we hope to see include:

- Data on attempted suicide by CYPs. We note that an inter-agency research workgroup chaired by the Institute of Mental Health has embarked on a study of suicides, suicidal and self-harming behaviours in CYPs. This data would facilitate NGOs' interventions with CYPs who experience suicide ideation.
- Data on children's educational engagement. Data on school attendance, CYP's sense of belonging to the school and participation in co-curricular activities will help practitioners to better understand the issues encountered by CYPs in school.
- Data on mainstream CYP's learning disabilities, disaggregated by type of disability. Having a detailed breakdown of the overall data on CYPs with learning disabilities will inform the prevalence of each learning disability, thereby helping NGOs make resource allocation decisions, identify issues in service outreach and prevent duplication of services.

12. We hope that there will eventually be procedures clearly spelt out with regard to requests for additional data not found on data.gov.sg.

D. Dissemination and awareness-raising

Observation

13. The State has generated awareness of the CRC over the years. However, the appreciation of child rights can be improved. For instance, an all girls' high school was embroiled in a recent controversy when, during a routine attire check, a female teacher had unbuttoned a few of the girls' uniforms to check the colour of their bra straps⁴. While these checks were carried out to ensure adherence to the school's policy on dress codes, which states that students are allowed to wear only white or beige undergarments, the actions raised issues on the lack of respect for children's privacy.

Recommendation

14. More can be done to help parents, caregivers, as well as the general public, understand what child rights entail and, more importantly, how they can be put into practice. Specifically, public education can focus on illustrating how adults can weave child rights into their everyday lives. Such resources can be presented as bite-sized practical tips. In addition,

⁴ Choo Yun Ting, "[Nanyang Girls' High apologises after attire check made students 'feel uncomfortable'](#)", *The Straits Times*, 29 January 2019.

the Social Service Institute⁵ can look into the provision of training on child rights for practitioners.

E. Training

Observation

15. Child protection training has been implemented for different sectors working directly with children. However, we observe that more can be done for professions outside of the social service sector.

16. For instance, SCS has observed that within the pre-school sector, not all teachers are equipped with the knowledge and skills to identify and respond to children who have care and protection needs. The relevant training is neither mandatory as part of their early childhood training, nor is it part of their continuing professional development (CPD). Beyond training, there needs to be support by way of supervision or mentoring on the processes and structures for reporting suspected abuses. (See paragraphs 39, 42-45, 48-49)

Recommendation

17. Adequate training and capacity building, as part of CPD, would enable different professions to flag up suspected child abuse or family violence concerns. Further support could be put in place for trained professionals to consult with or seek supervision from when the need arises.

F. Cooperation with civil society

Observation

18. Overall, there is cooperation between the State and civil society, for instance, the public consultations on the recent proposed legislative changes to the CYP A and the Penal Code, as well as briefings for NGOs to better understand child rights.

Recommendation

19. We look forward to a systematic collaboration by way of better engagement and follow through on the reporting cycle of the CRC. For instance, immediately after this reporting

⁵The Social Service Institute is the human capital development arm of Singapore's National Council of Social Services.

cycle, the State and NGOs could work together on the concluding observations in preparation for the next cycle. Mid-term reviews would be helpful.

II. DEFINITION OF THE CHILD

Observation

20. The State has taken necessary steps to harmonise the definition of the child in line with the CRC. One of the recommendations the Penal Code Review Committee has made is to increase the age-ceiling for the protection of minors, from 16 to 18 years old. This also mirrors the proposed amendments under the CYP A (2011), which extends the age limit to cover young persons below 18. These changes ensure the care and protection of this group of young persons.

No recommendation

III. GENERAL PRINCIPLES

A. **Non-discrimination**

Observation

Children who are non-Singaporean

21. In Singapore, approximately one in three marriages is between a Singaporean and a non-resident⁶. FY encounters quite a number of local spouses seeking to adopt their foreign spouses' children from a previous marriage. Many of them are from low- and middle-income families and cannot afford international school fees or foreign student fees at local schools for their prospective step-children. Moreover, since the CE Act does not apply to this group of children, some remain unschooled until their adoption gets approved and they are granted citizenship. This process could take up to two years.
22. A check with the State revealed that as at 31 December 2018, the number of stateless children aged 16 and below without permanent residency status stands at approximately 31. The costs of services for education and medical treatment, for example, are high and may be a challenge for parents to adequately provide for these children.

Recommendations

23. We acknowledge that it may not be tenable for the State to provide the same resources to these children as it does for Singaporean children. The State could explore working with NGOs and corporate entities to support these children to meet their education, mental and physical health needs.
24. To ensure judicious allocation of resources, eligibility criteria can be clearly spelt out.

B. **Best interests**

Observation

Child-sensitive interviewing procedures

25. SCS was given to understand that the Police, together with the Ministry of Social and Family Development (MSF) and the KK Women's and Children's Hospital are piloting a multi-disciplinary interview (MDI) process for young victims of sexual offences. The MDI model integrates interviews by various agencies into one and co-locates the interview as well as

⁶Ministry of Social and Family Development, [Reply to Parliamentary Question: Statistics on Transnational Marriages](#), 3 July 2017

forensic and medical examinations at the hospital. The intent of this initiative is to reduce the trauma faced by child victims from having to travel to different locations to recount the incidents of abuse to different professionals. The MDI model was initiated in June 2018 and is currently still in its pilot phase. The three agencies involved will be assessing its efficacy before deciding if it should be scaled up.

Media

26. There is another area whereby the State can play a bigger role in safeguarding the best interests of the child—the media (see Box 2).⁷

Box 2. Channel News Asia programme on inequality and class

In October 2018, a documentary about class divide in Singapore was aired on the local news outlet, Channel NewsAsia. Children and youths were interviewed on their views about the issue as part of the documentary. One of the youths, whose comments were edited out of context, became the target of backlash online after the documentary was released.

27. SCS wrote in to Channel NewsAsia to express our concerns and to offer our help in supporting the children who may have been affected by the production. To date, we have not heard from them.

CYPs in residential facilities

28. In reference to the State’s replies to the list of issues (CRC/C/SGP/Q/4-5/Add.1), we would like to call attention to paragraph 21d – on how the revisions to the CYPA on the use of physical force and restraints will allow for more effective management of CYPs in our residential facilities⁸. We caution that if this is not carried out with proper safeguards, authority may be abused, and harm done to residents⁹. In April 2019, the State had advised revisions to the Standards of Care for the governing board of residential homes to review such cases at least once in three months.

⁷ See articles published on online news outlets [Mothership](#) and [Rice Media](#).

⁸ Amongst others, the proposed amendments (i) enable licensed CYP Homes to de-escalate conflicts among residents and to prevent residents from causing self-harm or injury to others, through safe intervention methods and use of reasonable physical force, if necessary; (ii) allow the appropriate use of restraints by the Government-run Homes to prevent residents from escaping, or causing self-harm or injury to others, beyond just emergency situations.

⁹ Kelly Ng, “[2 Pertapis staff face 11 charges for alleged child abuse](#)”, *Today*, 23 April 2015.

Recommendations

29. Child-sensitive interviewing procedures: We would like for the State to provide updates on the progress and outcomes of the MDI model currently piloted for child sexual abuse victims. If the pilot outcomes are positive, the State could extend this model to all cases involving child victims.
30. Media: Guidelines should be put in place to minimise the risk of harm when conducting media interviews with CYPs, especially if the interviews are carried out in the context of social research. Such guidelines should clearly define the ethical considerations so that this vulnerable population is not put through unnecessary distress. An example is the guidelines that UNICEF has developed¹⁰ to assist journalists in interviewing and reporting on children. These include the need to avoid questions and comments that are judgemental, insensitive or that may potentially expose the child to embarrassment. CYPs participating in media interviews should also be provided with avenues to seek redress when necessary.
31. CYPs in residential facilities: We would urge for documentation to be maintained and for national statistics to be published each year on the incidence of physical force and restraint. This includes disaggregated data on the circumstances of CYPs subjected to restraint and the reasons for restraint.

C. Respect for the views of the child

Observation

32. We note in paragraph 38 of the State's replies to the list of issues (CRC/C/SGP/Q/4-5/Add.1) that it consults with CYPs and promotes their voices through various national and regional platforms, such as the Pre-University Seminar, Youth Conversations and SGfuture engagement series. The State places importance on these platforms and they usually involve key officials. The REACH consultation portal is another channel through which the State engages CYPs in policy and legislative matters.

Recommendations

33. We would like to know how inputs from CYPs at these forums and dialogue sessions inform future practice and policymaking. These would include efforts to evaluate the quality and impact of CYPs' participation; if CYPs understand what has been the outcome from their

¹⁰ See UNICEF's [reporting guidelines](#).

participation; and how their contribution has been used, among others. For example, while SCS organises a biennial Singapore Children's Forum, we acknowledge that more can be done in terms of follow-up to ensure that the children's views are taken up in concrete and meaningful ways.

34. More efforts can be channelled to make information on laws and policies that concern and impact CYPs in a language that can be easily understood by them. This will encourage CYPs to participate more actively on the REACH consultation portal.

IV. CIVIL RIGHTS AND FREEDOMS

A. **Protection of Privacy**

Observation

35. Generally, protection of CYPs' privacy is still an evolving area of work. In specific circumstances, however, measures have been implemented, such as when a CYP is undergoing police investigations or in court processes. In 2012 when the Personal Data Protection Act (PDPA) was enacted, academics^{11 12} and politicians¹³ alike pointed out that there is no special provision to protect the personal data of CYPs. Right now, examples of good practices are but only suggestions in the advisory guidelines on the PDPA¹⁴. As CYPs become more active participants in the digital world, laws around the world have tried to keep up to safeguard their privacy. Examples include the Children's Online Privacy Protection Act (1998) in the United States and the EU General Data Protection Regulation implemented just last year.

Recommendation

36. It has been seven years since the PDPA was enacted, and it could be timely for the State to re-examine the need to include the protection of CYPs' privacy in our legislation.

B. **Access to Appropriate Information**

Observation

37. There are classification guidelines for films and video games to protect children from access to inappropriate content. However, content on the internet remains largely unregulated as the State adopts a "light-touch approach"¹⁵. Internet filtering services are optional. The onus is on parents to supervise their children's access to the internet, yet not all parents are equally informed or have the ability to do so. It is a tough act to balance children's right to access information and the need to safeguard them.¹⁶

¹¹ Simon Chesterman, '[How best to protect children online](#)', *The Straits Times*, 13 October 2012.

¹² Warren B Chik. 'The Singapore Personal Data Protection Act and an assessment of future trends in data privacy', *Computer Law and Security Review*, 29, 5 (2013), 554-575.

¹³ Singapore Hansard (2012) Parliament No. 12, Session No. 1, Volume No. 89, Sitting No. 8

¹⁴ See [https://www.pdpc.gov.sg/-/media/Files/PDPC/PDF-Files/Legislation-and-Guidelines/ch-7---dataactivitiesminors-\(20180831\).pdf](https://www.pdpc.gov.sg/-/media/Files/PDPC/PDF-Files/Legislation-and-Guidelines/ch-7---dataactivitiesminors-(20180831).pdf)

¹⁵ The [Info-communications Media Development Authority's approach](#) to Internet regulation also involves encouraging industry self-regulation and promoting media literacy and cyber wellness through public education. Internet Access Service Providers are required to block access to only a limited number of websites as a symbolic statement of the Singapore community's stance against undesirable content online.

¹⁶ Lindsey Beaver. '[A paediatrician exposes suicide tips for children hidden in videos on YouTube and YouTube Kids](#)', *The Washington Post*, February 24, 2019.

Recommendation

38. The State could enhance the existing Internet Code of Practice for local Internet Access Service Providers (IASPs). At present, IASPs typically deny access to websites only when directed by the State to do so. A stronger system would be one where the IASPs are obliged to report undesirable content to the State whenever they are aware that their service have been used to access or distribute such content¹⁷.

¹⁷These best practices are adapted from The Protection Project and International Centre for Missing and Exploited Children's [Child Protection Model Law](#).

V. VIOLENCE AGAINST CHILDREN

A. Abuse and Neglect

Observation

Sector Specific Screening Guide (SSSG)

39. The State reported that the SSSG¹⁸ was introduced to help frontline professionals detect and manage child abuse concerns. There are currently three versions of the SSSG— for the healthcare, social service and education sectors. Following the implementation of the SSSG, FY’s Child Protection Specialist Centre (CPSC)¹⁹ has observed an increase in the accuracy of child protection case referrals, mainly from hospitals and community-based social service agencies. On the other hand, SCS’ experience is that the dissemination and usage of the SSSG are not as effective in the early childhood sector (see Box 3).

Box 3. Sector Specific Screening Guide

The SSSG has been rolled out in the early childhood sector since early 2016. In May 2017, SCS conducted an online survey to find out how prepared pre-school educators are in managing child abuse and neglect concerns. All pre-schools in Singapore, and educators whom we had previously worked with were invited to participate in this survey. A total of 336 educators responded, and close to 62% of them were in management positions, such as centre leaders. Our key findings indicated that:

- *27.1% of respondents are aware of the SSSG.*
- *Child protection training as part of CPD, as opposed to pre-service training, was shown to be more effective in providing educators with the knowledge on how to deal with suspected abuse cases.*
- *35% of respondents had received child protection training as part of their CPD, and the mean number of training hours was less than 2.6.*

Though derived from a small convenience sampling, the findings from this survey provided an insight into some of the challenges that pre-school educators face in child protection issues. We shared our survey findings with the State in July 2017, with two recommendations to (i) put in place a more robust child protection training framework, and (ii) formalise a dedicated team within the regulatory body overseeing the early childhood sector to attend to abuse concerns raised by the centres. The State replied that these are work in progress.

¹⁸ The Sector Specific Screening Guide (SSSG) and the Child Abuse Reporting Guide (CARG) are evidence-based tools under the Structured Decision Making System. The SSSG is used by frontline professionals who have contact with children on a regular basis. It guides professionals on whether an identified concern should be discussed with someone in the organisation who is more familiar with child protection issues. Within each organisation, trained professionals undertake the use of the CARG, which is used to guide the decision on whether to report a concern to Child Protective Service, take alternative action or take no action.

¹⁹ Established since 2013, CPSCs are appointed and funded by the State to look into child protection issues in the community and provide home-based interventions. CPSCs focus on low to moderate risk cases.

Public education on abuse prevention

40. The State report made reference to the child sexual abuse prevention programme that SCS has been conducting for pre-school children since 2011. To some extent, this programme plugs an existing gap in informing young children about prevention strategies. However, we have only managed to reach out to about 10,000 children over the last eight years—a small percentage of the total cohort of children in the early childhood years as each age cohort has about 39,000 children²⁰.
41. In FY's work with children with developmental delays, we noticed that there is a lack of resources that focus on empowering these children to speak up against abuse. Children who are non-verbal or have difficulties with verbal communication are exceptionally vulnerable.

Mandatory reporting of abuses

42. We appreciate the State's stand on how enhancing the capabilities of frontline professionals could be more effective than instituting mandatory reporting. We also recognise that social service practitioners are generally adequately trained to manage suspected abuse. We are not sure if the same can be said of other professionals who regularly come into contact with children. As elaborated in Box 3, pre-school educators still lack the knowledge and skills in dealing with suspected abuse, and SCS had encountered situations when cases were not promptly attended to, or were mismanaged as a result.
43. There are clear protocols for reporting child abuse concerns in the early childhood sector. Pre-school centre principals are required to notify their licensing officer (LO) at the Early Childhood Development Agency (ECDA).²¹ The LO has the discretion to then request that the centre assess the concern using the SSSG. However, principals who are not familiar with the SSSG have shared that the assessment can be intimidating and they are often not given much guidance in the process. This is made worse if the LO in charge of their centre is relatively junior and inexperienced.

²⁰ Department of Statistics Singapore, [Birth and Fertility](#), 2018.

²¹ ECDA serves as the regulatory and developmental authority for the early childhood sector in Singapore, overseeing all aspects of children's development below the age of six, across both kindergartens and child care centres.

Recommendations

44. Sector Specific Screening Guide: More coordinated efforts could be directed at generating awareness about the SSSG and its use among early childhood educators through cyclical structured briefings and trainings. Child protection training could also be included as a CPD course to ensure that pre-school educators are kept updated.
45. The State could consider evaluating the effectiveness of information dissemination and usage of the SSSG in the sectors that it has been rolled out to, if this is not already being done. This would help plug gaps in sectors where dissemination and skills training are found to still be lacking.
46. Public education on abuse prevention: Priority could be given to sustainable, upstream work in protecting our young children against sexual abuse. Such education could be integrated into the pre-school curriculum to ensure that all young children are taught the necessary protective skills. It also has to be built on and carried through in an age-appropriate manner through a child's primary and secondary school years. As the child grows older, the focus could shift to sensitising them to safety issues online, including sexual grooming.
47. The State could develop suitable resources for children with developmental delays. These can guide educators and help professionals in equipping these children with strategies to sound the alarm when the need arises.
48. Mandatory reporting of abuses: More resources could be channelled towards the training of professionals outside of the social service sector to enable them to better manage suspected abuse. CPD is a possible platform.
49. Feedback from educators suggests that child protection training within ECDA needs to be more rigorous so that better support can be provided to pre-school educators.

B. Torture or other cruel, inhuman or degrading treatment or punishment, including corporal punishment

Observation

Corporal punishment

50. In reference to paragraphs 36 and 37 of the State's replies to the list of issues (CRC/C/SGP/Q/4-5/Add.1), we agree that the rights and role of parents in caring for and disciplining their children must be respected. The reasonable use of corporal punishment is still practiced in families as well as in schools and institutions (as a last resort). A common observation when presented with research findings on the detrimental effects of corporal punishment is the limited applicability to the local context.

51. For parents who require parenting guidance, Triple P and Signposts are examples of parenting programmes which offer alternative parenting approaches. However, there is a group of low-income caregivers who need such skills, but are often unable to attend these group sessions because of the conflicting schedules. FY has a home-based family life education programme. Although it is resource-intensive, a home-based approach has been effective in engaging these caregivers in our experience.

Research

52. Where child abuse is concerned, only data on intra-familial²² child abuse investigations is accessible in the public domain. Data on extra-familial child abuse investigations are not published. We also do not know if the State collects nationally-representative data on the prevalence of child abuse and other types of violence against CYPs. Hence, we are not privy to the full extent of the problem of child abuse and neglect in Singapore. Based on paragraph 15 in Annex B of the State report, the priority areas for the National Child Protection Research Agenda appear to focus on child abuse in the context of the child welfare system.

Recommendations

53. Corporal punishment: In-depth research on the prevalence, effectiveness and impact of corporal punishment on children in Singapore would be most helpful.

²² The cases that the MSF's Child Protective Service handles involve CYPs who are abused by a family member (intra-familial abuse). If the perpetrators are strangers or non-family members, the police will investigate these as criminal cases.

54. The State could consider funding a variety of parent education programmes which vary in their delivery timings and locations. This will expand the reach to all parents who require parenting guidance, especially those who are unable to attend the regular parenting programmes due to long working hours or family commitments. This would scale up efforts to engage caregivers who would benefit from them.
55. Research: The State could consider collecting data on the prevalence of child abuse and neglect, if this is not already being done. If such data is available, the State could share this to help NGOs prioritise their service focus.

VI. FAMILY ENVIRONMENT AND ALTERNATIVE CARE

A. Family environment, parental guidance and parental responsibilities

Observation

Infant/ child care subsidies

56. In Singapore, children of pre-school age can choose to attend a child care centre or a kindergarten. Child care centres provide full day care from 7am to 7pm and the academic curriculum complements the care component. Kindergartens typically run three to four hours programmes which focus on academic learning, and they do not provide routine care for the children.

57. To ensure that every child has a good start, subsidies are put in place to help defray child care expenses. As subsidies for infant and child care are tied to the mother's working status²³, this pose a problem for some families whose mothers cannot take up employment due to family circumstances. At the 2019 Budget debates in March, the State introduced several measures to support non-working mothers (see Table A).²⁴

		Before March 2019	After March 2019
1. Working Mother	Monthly basic subsidy	USD \$221- \$442	USD \$221- \$442
	Monthly additional subsidy	USD \$325-\$398	USD \$325-\$398
2. Non-working Mothers on "Special Approval" appeal cases: <ul style="list-style-type: none"> • Mothers looking for a job • Mothers who require child care services for older child/children, while caring fulltime for the younger child aged 24 months and below 	Monthly basic subsidy	USD \$110	USD \$221- \$442 Duration of support: <ul style="list-style-type: none"> - Extended from 3 months to 6 months (for mothers looking for a job) - Extended till younger child is 24 months from the current 18 months (for mothers needing to care for younger children)
	Means-tested monthly additional subsidy	USD \$0	Up to a maximum of USD \$325-\$398

Table A. Infant and child care subsidies

²³ A working mother is defined as working at least 56 hours a month.

²⁴ Ministry of Social and Family Development, [Better Support For Parents Of Preschoolers And The Early Childhood Sector](#), Fact Sheet (Singapore, 2019).

58. Illustrated in Table A, the enhanced support (“Special Approval” appeal cases) is a vast improvement to the previous subsidy framework as it recognises the structural barriers that women, especially low-income mothers, encounter in seeking employment or re-entry into the workforce.

Parental leave schemes

59. Mothers who adopt a child younger than a year old are eligible for adoption leave. This paid leave has been increased from 4 to 12 weeks since 1 July 2017. It has been helpful as this allows for adoptive mothers to strengthen their bonds with their young adopted children.

60. However, the provision does not cover mothers who adopted children older than one year. Older adopted children have different needs from the younger ones and the capacity of older children to form relationships may be impacted by their earlier years’ experiences. Therefore, they may need more time for adjustments and to develop trust and attachment.

Bi-national families

61. For the interest of children in bi-national families, it is increasingly important to involve stakeholders who are positioned to address immigration-related, social and familial issues they face. The challenges encountered by these families are usually more multifaceted than Singaporean families.

62. From FY’s ground experience, caseworkers have observed that the stability of the family and the well-being of the children can be adversely impacted when disruptions such as divorce, family violence and spousal incarceration occur. For example, a non-Singaporean spouse may be compelled to return to his/her home country as the citizen spouse may withdraw sponsorship of the Long-term Visit Pass (LTVP). He/ She may also stay on in the marriage in spite of the threat of recurring family violence, out of fear that the offending spouse may stop sponsoring the LTVP.²⁵

Recommendations

63. Infant/ child care subsidies: The enhanced support continues to preclude some mothers who do not meet the eligibility criteria. These include those who experience long-term illness, are disabled, have an incarcerated partner or other extenuating circumstances such as needing

²⁵ In instances where the citizen spouse is incarcerated, caseworkers observe that renewal of LTVP has generally been facilitated by immigration authorities.

to care for other dependants in the family.²⁶ For families who are unable to access the enhanced subsidy support or require even further financial assistance, child and infant care affordability concerns remain.²⁷

64. Parental leave schemes: We recommend for adoption leave to include mothers who are adopting children older than a year.

65. Bi-national families: The State could consider forming an inter-agency operations team to advise and work with NGOs to help bi-national families resolve and navigate the complex issues faced by these families. This will also provide a single contact point for NGOs/ bi-national families.

B. Children deprived of a family environment

Observation

Beyond Parental Control

66. The Committee had in its 2011 concluding observations (CRC/C/SGP/CO/2-3) expressed “deep concern” at the State’s BPC programme, that CYPs between eight and 16 years old can be placed in settings that are the same as youth offenders, and that the system may be punitive rather than enabling.

67. Following a BPC review conducted by a multi-agency committee in 2013, some of its recommendations to improve the system have been put in place. For example, the Youth Court is now more sensitive to the placement of CYPs during the safe custody period when the social investigation report is being prepared. Instead of sending the CYP to the Singapore Boys’ Home (SBH) and Singapore Girls’ Home (SGH),²⁸ there have been at least one occasion when the Judge had called for the CYP to remain in his/her home when it was assessed that conditions are suitable.

68. In February 2019, the State called for a public consultation on the proposed changes to the CYPA, which may change the current provisions governing the BPC programme. Some proposed amendments include changing the terminology of BPC and mandating parents to

²⁶ AWARE, “[Why Are You Not Working? Low-income mothers explain challenges with work and care](#)”, 2018.

²⁷ While they have the option to apply for a “one-time grant” to cover the initial start-up costs for registration (uniforms, mattress/bedding covers, insurance as well as material fees), a deposit amounting to a month’s fees is additionally required and may be costly.

²⁸ Both these Homes are high security homes for young offenders.

attend pre-BPC diversion programme. The intentions of these recommendations are to frame BPC as more CYP-centric; to emphasise the role of families in the BPC programme; and to empower the Court to make a decision in the best interest of the CYPs.

69. In the course of SCS' work with parents who have filed a BPC complaint, we realised that many of them are stressed and experienced caregiver fatigue in parenting their CYP, some of whom may present with developmental/mental health conditions. Having the CYP remain in the natural home environment may not be the most effective or helpful as the parent and child may constantly trigger each other and strain their already poor relationship.

Singapore Girls' Home and Singapore Boys' Home

70. MSF publishes the number of young offenders and non-offenders in our SGH and SBH.²⁹

71. Whilst the SBH houses more offenders than non-offenders, the proportion of residents is grossly reversed in SGH (see Table B).³⁰ Between 2012 and 2018, SGH has housed more non-offenders than offenders, with the year 2018 recording the highest proportion of non-offenders either on Child Protection (CP) Orders or BPC Orders.

Home	Case Types	2012	2013	2014	2015	2016	2017	2018
Singapore Girls' Home (SGH)	Offender	29	45	33	29	26	13	12
	Non-Offender (% of total population)	35 (54.7%)	49 (52.1%)	53 (61.6%)	52 (64.2%)	68 (72.3%)	30 (69.8%)	40 (76.9%)
	Total	64	94	86	81	94	43	52

Table B. Breakdown of offenders and non-offenders in SGH

²⁹ The statistics can be found here: <https://www.msf.gov.sg/research-and-data/Research-and-Statistics/Pages/MSF-Youth-Homes-New-Admissions.aspx>

³⁰ Ministry of Social and Family Development, [MSF Youth Homes: New Admissions](#), 2019.

Family preservation and reunification

72. Singapore values the principle of family preservation and reunification, and seeks to enable children to remain safely in, or return to, their families where possible. This, however, may not be viable in some instances due to safety reasons despite repeated efforts. In some of these cases, children may remain in State care for a long time as permanency planning timeline is currently not legislated. The State does recognise this issue and is actively looking for ways to reduce the length of time a child remains in State care. The State is also examining whether a legislation change is necessary to facilitate permanency planning.

Recommendations:

73. Beyond Parental Control: The State could have regular meetings with all stakeholders to ensure that they appreciate the purpose of the BPC programme; this will enable accurate referrals. In addition, more research on the efficacy of the BPC programme and its impact on CYPs should be conducted.

74. SCS has given our feedback on the BPC programme to the State in the public consultation that closed on 21 March 2019. Our recommendations are as follows:

- i. Adopting an appropriate terminology that highlights the responsibility of the parents— We find that the proposed term “children in need of statutory supervision” still carries the connotation that the child is at fault and is to be blamed. Some suggestions are: “Supplementary Parental Guidance Order”, “Statutory Family Support” or “Statutory Family Guidance”. These suggested terms would highlight the importance of shared responsibilities between parents/caregivers and children in correcting the CYP’s misbehaviour.
- ii. Allowing the Court to mandate attendance at a family programme before a complaint can be filed. This would ensure that CYPs who can be helped with community-based resources do not have to be subjected to the harshness of the BPC programme.
- iii. Consider alternative placements during the safe custody period, rather than for the CYP to be placed in SBH or SGH. These alternative placement options can include kin care or the CYP Homes that currently take in BPC cases.

- iv. Keep the offender and non-offender populations (BPC and CP cases) in the SBH and SGH separate to avoid non-offenders being negatively influenced by offenders, if this is not already being done.
- v. Ensure that programming and interventions cater to the specific needs of the BPC population and are distinct from treatment provided to the youth offender population. This should apply both during the safe custody period and after the court order.
- vi. For parents who are experiencing caregiver fatigue and parenting stress, look into offering parents some respite.

75. Singapore Girls' Home and Singapore Boys' Home: With the SGH housing more non-offenders, it is necessary that different programmes are offered to cater to the non-offending population. Although MSF will be introducing more diversion programmes to prevent offenders from entering the system, it would take time for its efficacy to show. The State could share its evaluation findings when available.

76. Family preservation and reunification: We support and await the State's examination of permanency planning for children in State care.

C. Adoption

Observation

77. Compulsory pre-adoption briefing allow prospective adopters to better understand the process, eligibility criteria as well as the adoptive parents' responsibilities. The briefing provides important information to prospective adopters about the children's needs and it allows NGOs an opportunity to address the concerns of prospective adoptive parents, if any.

78. There are different kinds of adoption in Singapore and each type of adopters would face different issues. For instance, a couple looking at step-child adoption may be more interested to hear about blended family challenges whereas a couple contemplating relative-child adoption may have questions on disclosure issue. The current universal pre-adoption briefing has its limitations in addressing the needs of different types of adopters adequately.

Recommendation

79. We urge the State to consider conducting pre-adoption briefing by specific adoption types to better cater to the needs each entails.

D. Protection of children with incarcerated parents

Observation

80. As at December 2017, the State was reported to have 815 inmates with children under the age of 16.³¹ There are community agencies providing services such as befriending and mentoring, structured family programmes and tele-visit facilities to children experiencing parental incarceration. However, we are concerned about (i) the care arrangement of these children; (ii) children who witnessed the arrest of their parents and whether the immediate follow-up support is adequate; and (iii) children whose parents are sentenced to the death penalty.

Recommendations

81. There is a need to assess the alternative care arrangements of children whose parent(s) are incarcerated. At the same time, more support ought to be put in place for caregivers so that they can better manage their responsibilities. For example, a mother known to FY asked her single male friend to care for her four young sons aged between three and eight when she was incarcerated. The four children were abandoned at FY subsequently as the caregiver was unable to cope.
82. We urge the State to look into police procedures to limit trauma exposure for children during arrest. Children who have witnessed their parent's arrest should be referred immediately for support.
83. For children whose parent has been sentenced to the death penalty, the State could trigger an alert to relevant NGOs so that timely support can be offered to the families. More importantly, this will ensure that the children's well-being are being looked into³². They could take the form of therapeutic intervention or emotional support.

³¹ Rahimah Rashith, "[Support for kids of imprisoned parents](#)", *The Straits Times*, June 12, 2018

³² For example, when the CE Act was first enacted in 2003, the State appointed SCS to approach families whose children were not attending or registered for school. This cushions the resentment that these families may have against the State.

84. Help avenues, e.g. in-school counselling and pastoral care, programmes and services available in the community, can be more widely publicised. Publicity and dissemination of help resources could be done in community clubs, on social media, or on the school bulletin boards. Publicity materials have to also be worded with care as the stigma associated with incarceration might deter affected families and children from seeking help.

VII. DISABILITY, BASIC HEALTH AND WELFARE

A. Children with disabilities

Observation

Support for children with developmental needs

85. The State is enhancing its support for children under seven with developmental needs. Currently, there are very limited pre-school options for children with moderate to severe needs. For instance, as at December 2017, Kindle Garden, an inclusive pre-school which takes in mainstream children and children with mild to severe developmental needs, had a waiting list of 100 children with developmental needs³³. It is also estimated that 70% of all children presenting with moderate to severe developmental needs do not attend pre-school because of the severity of their needs or a lack of pre-school places.³⁴ The State is looking into better integrating this group of children into pre-schools.³⁵
86. The VWO Transport Subsidy is a tiered transport subsidy scheme offered by the State. It assists low- to middle-income families with children with developmental needs in defraying the transport cost between their homes and the Early Intervention Programme for Infants and Children (EIPIC) centres³⁶. At the onset, families have to pay a one month non-refundable deposit and the first month's transport fees. As the State reimburses up to 80% of the first month's transport fees only in the middle of the following month, finances can be tight for low-income families like Mary's, a client of FY (see Box 4).

³³ Shelina Ajit Assomull, '[Inclusive pre-school Kindle Garden caters to children of different needs](#)', *The Straits Times*, 18 December 2017

³⁴ Ho, Lai Yun, '[Building an inclusive early childhood intervention ecosystem in Singapore 1988 to 2017 for the 16th Haridas Memorial Lecture Singapore](#)' (Department of Child Development, KK Women's and Children's Hospital, 2018)

³⁵ Amelia Teng, '[Move to have a more inclusive pre-school education](#)', *The Straits Times*, 11 April 2019.

³⁶ EIPIC seeks to equip infants and young children with developmental needs with improved motor, communication, social, self-help and cognitive skills.

Box 4. Mary

Four-year-old Mary is diagnosed with Autism Spectrum Disorder. Her father has been certified unfit for work for nine months due to his mental health condition. Her mother is a homemaker and she is the main caregiver to Mary and her two younger siblings. The family is currently supported by the State's financial assistance scheme, wherein monthly utilities and home rental cost are fully covered. In addition, a monthly cash grant of US\$815 is provided for six months. The table illustrates the cash outflow of Mary's family:

Month	Transport fees	Monthly cash grant	Transport fee & reimbursement	Balance
1 st	i. One month non-refundable deposit	US\$815	i. US\$133	US\$549
	ii. Monthly fees		ii. US\$133	
2 nd	i. Monthly fees	US\$815	i. US\$133	US\$788
	ii. Reimbursed 80% of 1 st month's fees		ii. US\$106	
<i>This cycle continues in the subsequent months.</i>				

Cash is tight in the family and it is difficult for the parents to be able to afford any other form of therapy for Mary.

Compulsory Education

87. Effective from 2019, children with disabilities and SEN are included in the CE Act. This is a welcome step towards the inclusion of every child regardless of his or her learning challenges and developmental needs. Since this has just taken effect, we are as yet unable to gather any useful ground feedback at the writing of this report.

88. To support children with mild SEN in mainstream schools, the State has put in place training and resources³⁷, including equipping all primary schools with at least one Allied Educator (Learning and Behavioural Support- AED[LBS]) trained in special needs interventions. Our observation is that it can be difficult for the AEDs to give adequate attention to children with SEN since these children spread across different classes in different levels. A similar

³⁷ The Ministry of Education has introduced specific content on special needs in the pre-service training for all beginning teachers and all schools are supported by a core group of teachers in special needs who are equipped with a deeper understanding of SEN. Source: [Report of the Advisory Panel on the Implementation of Compulsory Education for Children with Special Educational Needs](#), 17 November 2017

observation was brought up by a Member of Parliament (MP) in a parliamentary speech in July 2018. She cited instances where teachers and AEDs have difficulty managing the students and class situations as the needs and pace of learning vary greatly. She further noted that there appeared to be a shortage of teachers trained to teach students with SEN³⁸. In the same Parliamentary sitting, a Nominated Member of Parliament (NMP) added that currently, the use of and access to occupational therapists in schools is low and they are usually activated or provided on an ad hoc and time-limited basis.³⁹

Special Student Care Centres

89. There are 19 Special Education (SPED)⁴⁰ schools in Singapore, but there are only seven Special Student Care Centres (SSCCs) to cater to the developmental engagement of these children after school hours. Most of these SSCCs are not co-located within the SPED schools.

Caregiver resources

90. The State has developed guides for parents, caregivers, educators and practitioners⁴¹, offering practical suggestions on modifying play activities for children with different abilities. These materials are typically meant for self-reading but not all caregivers have the capacity to fully understand the information.

Public education efforts

91. There is an on-going five-year public education campaign to promote inclusion in Singapore⁴². In recent years, there are also ground-up initiatives such as Superhero Me, an inclusive arts movement that promotes social mixing amongst children of diverse backgrounds.

³⁸ Singapore Hansard (2018) Parliament No. 13, Session No. 2, Volume No. 94, Sitting No. 80

³⁹ Ibid.

⁴⁰ SPED schools run programmes which cater to distinct disability profiles of children with special educational needs.

⁴¹ An example is the Health Promotion Board's 'Healthier Child, Brighter Future' and ECDA's Care and Development Resource Kit help parents to monitor their child's growth and development.

⁴² See <https://www.ncss.gov.sg/Our-Initiatives/See-The-True-Me/About>

Recommendations

92. Support for children with developmental needs: FY has given periodic feedback to the State that the current reimbursement approach for transport subsidies is not helpful for cash strapped low-income families. The State could re-look the administration of the subsidy disbursement.
93. Compulsory Education: We urge the State to look into the points brought up by the MP and NMP to ensure all students with SEN can access quality professional services on a continuing and sustainable basis. This includes the utilisation of support services provided by organisations like Singapore Association of Occupational Therapists and the Society for the Physically Disabled to support schools.
94. Special Student Care Centres: More SSCCs could be set up, and they should preferably be located within the SPED schools. This will reduce transport costs for the families.
95. Caregiver resources: The content in these resources could be presented in a manner that is easily understood for all caregivers, e.g. using more pictorial to bring across ideas and concepts.
96. Public education efforts: We look forward to the evaluation results at the end of the five-year campaign to find out how these efforts have changed public perception. These findings would help in the service delivery of relevant NGOs.

B. Adolescent health

Observation

97. We note that the State had explained in paragraph 83 in its replies to the list of issues (CRC/C/SGP/Q/4-5/Add.1) that the police are activated as first responders for cases of attempted suicides. This is done to ensure the safety of the person in distress.

Recommendation

98. In addition to the police being the first responder, the State could consider activating mental health professionals too. This would facilitate the provision of emotional support onsite to the child and his/ her family members.

C. Social security

Observation

99. In November 2018, the State published a report on the measures that it has taken to address the issue of social stratification. This Occasional Paper⁴³, which is the first of its kind, is available for public access and includes indicators on the progress of children from low-income families.

100. There are various social assistance schemes in place to support and uplift low-income families. However, these measures typically focus on reducing material scarcity by providing short-term hand-outs of three to six months, like the ComCare Short-to-Medium Term Assistance (SMTA).⁴⁴ The experience of SCS caseworkers is that current assistance schemes are administered according to strict eligibility criteria (through assets and means testing) in specific domains for limited spans of time, are highly conditional and are subjected to regular reviews (see Box 5). In March 2019, the State announced strengthening social service delivery through more comprehensive, convenient and coordinated support for low-income and vulnerable families⁴⁵.

⁴³ The [MSF's Occasional Paper](#) highlights the various government schemes in place to assist the low-income and vulnerable families in Singapore.

⁴⁴ They succeed in helping families who have temporarily slipped into crisis and are experiencing “episodic” poverty.

⁴⁵ Ministry of Social and Family Development [Better Support For Parents Of Preschoolers And The Early Childhood Sector](#), Press Release (Singapore, 2019).

Box 5. Mdm Nancy and John

Mdm Nancy is a divorced single-mother who has legal custody of John, her 15-year-old son. She has four other siblings, but is tasked with the sole responsibility of caring for their 85-year-old father with a mental health condition. She has not been able to work since.

Mdm Nancy's divorce led to the sale of the flat she shared with her ex-husband. Since 2012, she had been living in a subsidised public rental flat with her father and son and her household has been receiving case work support from SCS' Family Service Centre.

John has begun to display risky behaviour and has committed petty crimes. He was caught for shoplifting on two consecutive days. John also had run away from home several times.

Mdm Nancy and John had also exhausted the two-year temporary relief from The Straits Times School Pocket Money Fund (STSPMF). The social worker has applied for a further extension of the STSPMF, which under special circumstances can be extended but capped at 48 months; renewal application has to be done every six monthly. Mdm Nancy now relies on a separate grant provided by the education ministry for her son's educational needs, but the grant covers only school-related expenses such as his uniforms and books.*

Mdm Nancy's on-going application to the SMTA is being reviewed and is contingent on her meeting requirements. However, she is stuck because she is unable to work due to her caregiving role to her father.

**The STSPMF provides pocket money to children and youth from low-income families to help them through school. The children can use this money for school-related expenses, such as buying a meal during recess, paying for transport or using it to meet other schooling needs. The assistance period can be up to two years.*

Recommendations

101. Information provided in the Occasional Paper is helpful in guiding the work of social service practitioners. We hope the State will continue to provide insights into the outcomes of initiatives undertaken to address societal concerns.

102. We are hopeful that the new measures will translate to social assistance schemes that are sensitive to the unique circumstances of the families. The State could look into collecting feedback from NGOs on how these measures have helped families in need.

VIII. EDUCATION, LEISURE AND CULTURAL ACTIVITIES

A. **Provision of quality education**

Observation

103. Children in Singapore receive quality education and are able to achieve significant educational mobility⁴⁶. Even so, one persistent criticism of the education system has been on its academic streaming⁴⁷. This streaming exercise and its inadvertent labelling has, in the 40 years since its implementation, generated unintended stigma against academically weaker students.

104. In March 2019, the State announced plans to abolish streaming and replace it with subject-based banding (SBB)⁴⁸ across all secondary schools by 2024. This is much welcomed, as it will allow for customised learning at the students' own pace. In time, it will hopefully reduce the comparison and competitive stress among students.

105. While there have been significant changes to the education system, it would likely take some time to shift parents' mind-sets away from the over-emphasis on academic achievements. The findings of an education survey of 1,200 respondents showed that more children are enrolling in private tuition outside of school hours as they rise through the school levels, with 72% of the parents surveyed indicating that they would send their children for private tuition even if they are already performing well in school. This led to a MP labelling Singapore a "tuition nation".⁴⁹ The role of private tuition has increasingly shifted from providing supplementary help to weaker students to giving children whose parents can afford the fees the advantages over their peers.

106. There are also concerns that, with the education reform to cut back on examinations, private tuition operators will attempt to fill the void by simulating exam-like conditions for

⁴⁶ OECD. "[Equity in education: Breaking down barriers to social mobility](#)", *PISA*, OECD Publishing, 2018.

⁴⁷ Currently, based on student's Primary School Leaving Examination results, they are channelled into the Express, Normal (Academic) or Normal (Technical) streams in secondary school.

⁴⁸ Students will be able to study subjects (such as Mathematics, Science and Humanities) at a range of levels, based on their strengths and interests. Furthermore, the State plans to consolidate the existing GCE N- and O-Level examinations into a common national examination. Students will then graduate with a common national certificate which reflects the level at which each subject is taken.

⁴⁹ Amelia Teng, "[Call to stop tuition centres promoting ways to game system](#)", *The Straits Times*, 12 July 2018.

students⁵⁰. It remains to be seen if changes by the State aimed at reducing the stress and anxiety of Singapore's education system might be undermined.

Recommendation

107. While the State has initiatives in place to help parents manage their expectations, it could also ensure responsible advertising from private tuition agencies to prevent misleading claims and “gaming” of the education system.

⁵⁰ Jolene Ang, [“Tuition centres should not prey on parents' anxieties over removal of exams: Ong Ye Kung”](#), *The Straits Times*, 3 October 2018.

IX. SPECIAL PROTECTION MEASURES

A. Sexual exploitation and sexual abuse

Observation

108. We welcome the State's proposed amendments to the Penal Code, with a number of key changes centred on enhancing protection for minors in sexual offences. This includes the criminalisation of child abuse material (CAM) in recognition of the harm and depravity inherent in such material.

109. As mentioned in paragraph 52 in this report, we do not know if the State collects nationally representative data on the prevalence of child sexual exploitation and abuse. The data presented in Annex C of the State report does not give a complete picture on the prevalence of child sexual abuse in Singapore, as the data does not take into account extra-familial abuse cases.

Recommendations

110. Individuals in professions, such as teaching, interact with children as part of their work, and therefore owe a duty of care to report knowledge of CAM. This duty of care obligation should also extend to individuals who, in their professional capacity, do not come into contact with children, but may potentially come across CAM as a result of their job responsibilities. They could be, but are not limited to, IT professionals, and organisations or corporations whose services may be used to proliferate CAM or related activities, such as the IASPs, search engines, software companies, social media companies, credit card companies and banks.⁵¹

111. Understanding the prevalence of child sexual abuse will help to prioritise public education efforts in its prevention.

⁵¹ Please refer to SCS' [submission](#) on Child Abuse Material to the Penal Code Review Committee.

B. Protection for victims and witnesses of crimes

Observation

Appropriate Adult Scheme for Young Suspects

112. On the Appropriate Adult Scheme for Young Suspects (AAYS)⁵², feedback from the ground has been generally positive as social service professionals feel that this is a marked improvement from the past when the young suspect undergoes police interviews unaccompanied. However, after the police interview, we are unsure if the young suspect receives any form of professional support in the lead up to court proceedings. The AA is prohibited from any contact or follow-up with the young suspect due to potential conflict of interest.⁵³ We have flagged up this gap to the relevant authorities.

Vulnerable Witness Support Programme

113. Referrals for the Vulnerable Witness Support Programme (VWSP) have remained low. In 2018, SCS received 21 activations to the Family Justice Court and one to the State Court to accompany and support child witnesses. Observations from stakeholder meetings point to a low awareness of this service and consequently, low utilisation by law enforcement personnel and judicial authorities.

Recommendations

114. Appropriate Adults for Young Suspects: The State could consider measures, e.g. independent counselling, to support young suspects in the lead up to court proceedings.

115. Vulnerable Witness Support Programme: Law enforcement and judicial authorities should continue to tap on this service.

⁵² At the moment, this programme is on a pilot run and is slated to be fully rolled out in April 2020. The scope and reach of the AAYS is expected to extend beyond police investigations to also cover investigations carried out by other agencies such as the Central Narcotics Bureau.

⁵³ They must remain neutral and not advocate for the young suspect, nor provide legal advice or disrupt the course of justice in any way.

Appendix 1—Proposed recommendations for the Concluding Observations

I. GENERAL MEASURES OF IMPLEMENTATION

Adoption:

1. We welcome the State's current review of the ACA; we hope that it could look into regulating existing matching practices.

Runaway youths:

2. The State could look into enacting a legislation to allow NGOs to place runaway youths in temporary shelters. Provisions similar to the "Runaway and Homeless Youth Act" in the U.S. will be helpful.

Coordination and National Plan of Action:

3. We urge the State to consider developing an action plan to serve as a roadmap for the advancement of child well-being to guide NGOs, businesses and professions working with children. The roadmap could lay out strategic directions and key milestones to guide these stakeholders who work at different levels through diverse modalities in aligning their services with the broader picture, resulting in a more coordinated effort.

Data Collection:

4. We hope that the State will formulate more child well-being indicators consistent with the CRC and collect data that will allow better insights into the state of our children's well-being. For example, the United States' National Survey of Children's Health⁵⁴ examines positive and strengths-based indicators such as how often a child is read to, and whether the child participates in organised activities/ lessons in school, on top of child health indicators.
5. Examples of child well-being indicators we hope to see include:
 - Data on attempted suicide by CYPs. We note that an inter-agency research workgroup chaired by the Institute of Mental Health has embarked on a study of suicides, suicidal and self-harming behaviours in CYPs. This data would facilitate NGOs' interventions with CYPs who experience suicide ideation.

⁵⁴ NSCH is backed by the US' Department of Health and Human Services. See NSCH's web portal at <http://childhealthdata.org/>.

- Data on children’s educational engagement. Data on school attendance, CYP’s sense of belonging to the school and participation in co-curricular activities will help practitioners to better understand the issues encountered by CYPs in school.
 - Data on mainstream CYP’s learning disabilities, disaggregated by type of disability. Having a detailed breakdown of the overall data on CYPs with learning disabilities will inform the prevalence of each learning disability, thereby helping NGOs make resource allocation decisions, identify issues in service outreach and prevent duplication of services.
6. We hope that there will eventually be procedures clearly spelt out with regard to requests for additional data not found on data.gov.sg.

Dissemination and Awareness-raising

7. More can be done to help parents, caregivers, as well as the general public, understand what child rights entail and, more importantly, how they can be put into practice. Specifically, public education can focus on illustrating how adults can weave child rights into their everyday lives. Such resources can be presented as bite-sized practical tips. In addition, the Social Service Institute⁵⁵ can look into the provision of training on child rights for practitioners.

Training:

8. Adequate training and capacity building, as part of CPD, would enable different professions to flag up suspected child abuse or family violence concerns. Further support could be put in place for trained professionals to consult with or seek supervision from when the need arises.

Cooperation with Civil Society:

9. We look forward to a systematic collaboration by way of better engagement and follow through on the reporting cycle of the CRC. For instance, immediately after this reporting cycle, the State and NGOs could work together on the concluding observations in preparation for the next cycle. Mid-term reviews would be helpful.

⁵⁵The Social Service Institute is the human capital development arm of Singapore’s National Council of Social Services.

III. GENERAL PRINCIPLES

Children who are non-Singaporean:

10. We acknowledge that it may not be tenable for the State to provide the same resources to these children as it does for Singaporean children. The State could explore working with NGOs and corporate entities to support these children to meet their education, mental and physical health needs.

11. To ensure judicious allocation of resources, eligibility criteria can be clearly spelt out.

Child-sensitive interviewing procedures:

12. We would like for the State to provide updates on the progress and outcomes of the MDI model currently piloted for child sexual abuse victims. If the pilot outcomes are positive, the State could extend this model to all cases involving child victims.

Media:

13. Guidelines should be put in place to minimise the risk of harm when conducting media interviews with CYPs, especially if the interviews are carried out in the context of social research. Such guidelines should clearly define the ethical considerations so that this vulnerable population is not put through unnecessary distress. An example is the guidelines that UNICEF has developed⁵⁶ to assist journalists in interviewing and reporting on children. These include the need to avoid questions and comments that are judgemental, insensitive or that may potentially expose the child to embarrassment. CYPs participating in media interviews should also be provided with avenues to seek redress when necessary.

CYPs in residential facilities:

14. We would urge for documentation to be maintained and for national statistics to be published each year on the incidence of physical force and restraint. This includes disaggregated data on the circumstances of CYPs subjected to restraint and the reasons for restraint.

Respect for the views of the child:

15. We would like to know how inputs from CYPs at these forums and dialogue sessions inform future practice and policymaking. These would include efforts to evaluate the quality and

⁵⁶ See UNICEF's [reporting guidelines](#).

impact of CYPs' participation; if CYPs understand what has been the outcome from their participation; and how their contribution has been used, among others. For example, while SCS organises a biennial Singapore Children's Forum, we acknowledge that more can be done in terms of follow-up to ensure that the children's views are taken up in concrete and meaningful ways.

16. More efforts can be channelled to make information on laws and policies that concern and impact CYPs in a language that can be easily understood by them. This will encourage CYPs to participate more actively on the REACH consultation portal.

IV. CIVIL RIGHTS AND FREEDOMS

Protection of Privacy:

17. It has been seven years since the PDPA was enacted, and it could be timely for the State to re-examine the need to include the protection of CYPs' privacy in our legislation.

Access to Appropriate Information:

18. The State could enhance the existing Internet Code of Practice for local Internet Access Service Providers (IASPs). At present, IASPs typically deny access to websites only when directed by the State to do so. A stronger system would be one where the IASPs are obliged to report undesirable content to the State whenever they are aware that their service have been used to access or distribute such content⁵⁷.

V. VIOLENCE AGAINST CHILDREN

Sector Specific Screening Guide:

19. More coordinated efforts could be directed at generating awareness about the SSSG and its use among early childhood educators through cyclical structured briefings and trainings. Child protection training could also be included as a CPD course to ensure that pre-school educators are kept updated.
20. The State could consider evaluating the effectiveness of information dissemination and usage of the SSSG in the sectors that it has been rolled out to, if this is not already being done. This would help plug gaps in sectors where dissemination and skills training are found to still be lacking.

⁵⁷These best practices are adapted from The Protection Project and International Centre for Missing and Exploited Children's [Child Protection Model Law](#).

Public education on abuse prevention:

21. Priority could be given to sustainable, upstream work in protecting our young children against sexual abuse. Such education could be integrated into the pre-school curriculum to ensure that all young children are taught the necessary protective skills. It also has to be built on and carried through in an age-appropriate manner through a child's primary and secondary school years. As the child grows older, the focus could shift to sensitising them to safety issues online, including sexual grooming.
22. The State could develop suitable resources for children with developmental delays. These can guide educators and help professionals in equipping these children with strategies to sound the alarm when the need arises.

Mandatory reporting of abuses:

23. More resources could be channelled towards the training of professionals outside of the social service sector to enable them to better manage suspected abuse. CPD is a possible platform.
24. Feedback from educators suggests that child protection training within ECDA needs to be more rigorous so that better support can be provided to pre-school educators.

Corporal punishment:

25. In-depth research on the prevalence, effectiveness and impact of corporal punishment on children in Singapore would be most helpful.
26. The State could consider funding a variety of parent education programmes which vary in their delivery timings and locations. This will expand the reach to all parents who require parenting guidance, especially those who are unable to attend the regular parenting programmes due to long working hours or family commitments. This would scale up efforts to engage caregivers who would benefit from them.

Research:

27. The State could consider collecting data on the prevalence of child abuse and neglect, if this is not already being done. If such data is available, the State could share this to help NGOs prioritise their service focus.

VI. FAMILY ENVIRONMENT AND ALTERNATIVE CARE

Infant/ child care subsidies:

28. The enhanced support continues to preclude some mothers who do not meet the eligibility criteria. These include those who experience long-term illness, are disabled, have an incarcerated partner or other extenuating circumstances such as needing to care for other dependants in the family.⁵⁸ For families who are unable to access the enhanced subsidy support or require even further financial assistance, child and infant care affordability concerns remain.⁵⁹

Parental leave schemes:

29. We recommend for adoption leave to include mothers who are adopting children older than a year.

Bi-national families:

30. The State could consider forming an inter-agency operations team to advise and work with NGOs to help bi-national families resolve and navigate the complex issues faced by these families. This will also provide a single contact point for NGOs/ bi-national families.

Beyond Parental Control:

31. The State could have regular meetings with all stakeholders to ensure that they appreciate the purpose of the BPC programme; this will enable accurate referrals. In addition, more research on the efficacy of the BPC programme and its impact on CYPs should be conducted.

32. SCS has given our feedback on the BPC programme to the State in the public consultation that closed on 21 March 2019. Our recommendations are as follows:

- i. Adopting an appropriate terminology that highlights the responsibility of the parents— We find that the proposed term “children in need of statutory supervision” still carries the connotation that the child is at fault and is to be blamed. Some suggestions are: “Supplementary Parental Guidance Order”, “Statutory Family Support” or “Statutory Family Guidance”. These suggested

⁵⁸ AWARE, “[Why Are You Not Working? Low-income mothers explain challenges with work and care](#)”, 2018.

⁵⁹ While they have the option to apply for a “one-time grant” to cover the initial start-up costs for registration (uniforms, mattress/bedding covers, insurance as well as material fees), a deposit amounting to a month’s fees is additionally required and may be costly.

terms would highlight the importance of shared responsibilities between parents/caregivers and children in correcting the CYP's misbehaviour.

- vii. Allowing the Court to mandate attendance at a family programme before a complaint can be filed. This would ensure that CYPs who can be helped with community-based resources do not have to be subjected to the harshness of the BPC programme.
- viii. Consider alternative placements during the safe custody period, rather than for the CYP to be placed in SBH or SGH. These alternative placement options can include kin care or the CYP Homes that currently take in BPC cases.
- ix. Keep the offender and non-offender populations (BPC and CP cases) in the SBH and SGH separate to avoid non-offenders being negatively influenced by offenders, if this is not already being done.
- x. Ensure that programming and interventions cater to the specific needs of the BPC population and are distinct from treatment provided to the youth offender population. This should apply both during the safe custody period and after the court order.
- xi. For parents who are experiencing caregiver fatigue and parenting stress, look into offering parents some respite.

Singapore Girls' Home and Singapore Boys' Home:

- 33. With the SGH housing more non-offenders, it is necessary that different programmes are offered to cater to the non-offending population. Although MSF will be introducing more diversion programmes to prevent offenders from entering the system, it would take time for its efficacy to show. The State could share its evaluation findings when available.

Family preservation and reunification:

- 34. We support and await the State's examination of permanency planning for children in State care.

Adoption:

35. We urge the State to consider conducting pre-adoption briefing by specific adoption types to better cater to the needs each entails.

Protection of children with incarcerated parents:

36. There is a need to assess the alternative care arrangements of children whose parent(s) are incarcerated. At the same time, more support ought to be put in place for caregivers so that they can better manage their responsibilities. For example, a mother known to FY asked her single male friend to care for her four young sons aged between three and eight when she was incarcerated. The four children were abandoned at FY subsequently as the caregiver was unable to cope.
37. We urge the State to look into police procedures to limit trauma exposure for children during arrest. Children who have witnessed their parent's arrest should be referred immediately for support.
38. For children whose parent has been sentenced to the death penalty, the State could trigger an alert to relevant NGOs so that timely support can be offered to the families. More importantly, this will ensure that the children's well-being are being looked into⁶⁰. They could take the form of therapeutic intervention or emotional support.
39. Help avenues, e.g. in-school counselling and pastoral care, programmes and services available in the community, can be more widely publicised. Publicity and dissemination of help resources could be done in community clubs, on social media, or on the school bulletin boards. Publicity materials have to also be worded with care as the stigma associated with incarceration might deter affected families and children from seeking help.

VII. DISABILITY, BASIC HEALTH AND WELFARE

Support for children with developmental needs:

40. FY has given periodic feedback to the State that the current reimbursement approach for transport subsidies is not helpful for cash strapped low-income families. The State could re-look the administration of the subsidy disbursement.

⁶⁰ For example, when the CE Act was first enacted in 2003, the State appointed SCS to approach families whose children were not attending or registered for school. This cushions the resentment that these families may have against the State.

Compulsory Education:

41. We urge the State to look into the points brought up by the MP and NMP to ensure all students with SEN can access quality professional services on a continuing and sustainable basis. This includes the utilisation of support services provided by organisations like Singapore Association of Occupational Therapists and the Society for the Physically Disabled to support schools.

Special Student Care Centres:

42. More SSCCs could be set up, and they should preferably be located within the SPED schools. This will reduce transport costs for the families.

Caregiver resources:

43. The content in these resources could be presented in a manner that is easily understood for all caregivers, e.g. using more pictorial to bring across ideas and concepts.

Public education efforts:

44. We look forward to the evaluation results at the end of the five-year campaign to find out how these efforts have changed public perception. These findings would help in the service delivery of relevant NGOs.

Adolescent health:

45. In addition to the police being the first responder, the State could consider activating mental health professionals too. This would facilitate the provision of emotional support onsite to the child and his/ her family members.

Social Security:

46. Information provided in the Occasional Paper is helpful in guiding the work of social service practitioners. We hope the State will continue to provide insights into the outcomes of initiatives undertaken to address societal concerns.
47. We are hopeful that the new measures will translate to social assistance schemes that are sensitive to the unique circumstances of the families. The State could look into collecting feedback from NGOs on how these measures have helped families in need.

VIII. EDUCATION, LEISURE AND CULTURAL ACTIVITIES

Provision of quality education:

48. While the State has initiatives in place to help parents manage their expectations, it could also ensure that responsible advertising from private tuition agencies to prevent misleading claims and “gaming” of the education system.

IX. SPECIAL PROTECTION MEASURES

Sexual exploitation and sexual abuse:

49. Individuals in professions, such as teaching, interact with children as part of their work, and therefore owe a duty of care to report knowledge of CAM. This duty of care obligation should also extend to individuals who, in their professional capacity, do not come into contact with children, but may potentially come across CAM as a result of their job responsibilities. They could be, but are not limited to, IT professionals, and organisations or corporations whose services may be used to proliferate CAM or related activities, such as the IASPs, search engines, software companies, social media companies, credit card companies and banks.⁶¹

50. Understanding the prevalence of child sexual abuse will help to prioritise public education efforts in its prevention.

Appropriate Adults for Young Suspects:

51. The State could consider measures, e.g. independent counselling, to support young suspects in the lead up to court proceedings.

Vulnerable Witness Support Programme:

52. Law enforcement and judicial authorities should continue to tap on this service.

⁶¹ Please refer to SCS' [submission](#) on Child Abuse Material to the Penal Code Review Committee.