

## VIOLENCE AGAINST CHILDREN IN NIGERIA: CHILD BATTERING IN FOCUS<sup>1</sup>

### Abstract

Violence against children is increasing gaining momentum every day. In the society, the perpetrators are regrettably those who ordinarily should protect the interest of the child; these include parents, guardians, teachers, friends, and elders in the society. In Nigeria, parents and guardians have the rights to exercise control and supervision over the conduct of their children and wards, and thus can issue correction and disciplinary actions on the child. Consequently, children are corrected by beating mainly. This, the society believe is important in ensuring that children conform to the usual norms and values of the society. In the traditional society, excessive beating could be controlled by the child running to any available elder and that would stop the beating; however, with urban migration that would no longer be obtainable. This work examines violence against children in Nigeria, focusing on child battering. This paper therefore discusses the incidences of child battering in Nigeria, its consequences and the right approach to curb such violence in Nigeria. The doctrinal method is adopted in this work. Our findings include: child battering is rampant today in our homes, school, churches, communities etc. Children are battered in Nigeria based on the premise that if you spare the rod, you spoil the child. This in turn has resulted in the death of children, disfiguring of children, psychological imbalance in some children, depression in some children, injuries, thoughts of suicide and so on. Consequently, we recommend, among others, government policies and strategies to end violence against children in Nigeria, and ensure the adoption and implementation of laws concerning the child in all States of the Federation, as well as public education and awareness for the perpetrators and the children alike by government, civil society, institutions, and organisations campaigning for the rights of the child.

**Key words:** Violence, Child, Battering, Parents, Guardians, Teachers.

### 1. Introduction

A battered child is a child whom physical abuse has been inflicted usually by a relative, caregiver, or close family friend. Child battering is the physical abuse of a child by a parent or guardian by beating.<sup>2</sup> This can result to bruises, broken parts of the body, hemorrhages, severe body pains, scars on the body, sight loss, disability, death and so on. Battering a child in the society is not seen as harmful; rather it is encouraged among parents, teachers, elder relations, for the purpose of disciplining and correcting the child. Due to this accepted practice, children are often exposed to this form of violence especially at home. Battering of the child at home, school and other places is prevalent in Nigeria, and children hardly report these incidents because of the fear of the reaction of the perpetrators and the perception of beating as a form of correction in the society.

### 2. Definition of Relevant Terms

**Violence-** Violence is defined as the use of physical force, usually accompanied by fury, vehemence, or outrage, especially physical force unlawfully exercised with the intent to harm.<sup>3</sup> It is defined as a violent behaviour that is intended to hurt or kill somebody.<sup>4</sup> The World Health Organization (WHO) defines violence as the intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, which either results in injury, death, psychological harm, maldevelopment, or deprivation. Violence could be physical, sexual, and emotional.

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<sup>2</sup> B.A. Garner (ed), *Black's Law Dictionary*, (9<sup>th</sup> edn, USA, West Publishig Co.)2009 Pg. 271

<sup>3</sup> *Ibid.*, Pg.1705

<sup>4</sup> A.S .Hornby, *Oxford Advanced Learner's Dictionary of Current English*, (New York, Oxford University Press, 2010) Pg 1659

**Battery-** Battery has been defined as the intentional application of force to another person.<sup>5</sup> Battery is also defined as the infliction of unlawful force on another person. It is the direct and intentional application of force to another person without that person's consent. Battery must be direct and physical; this means that there must be some contact with the plaintiff before a battery is committed.<sup>6</sup> Battery is defined as the intentional application of force to another person. In battery, it is not necessary that there should be any kind of bodily contact between the defendant and the plaintiff. It is sufficient if the defendant directly brings some material object into contact with the plaintiff's person. Thus, for example, it is battery to throw stones at a person, and to spit in his face, knock a person down, beat with a stick, pour water on a person, set a dog to attack a person.<sup>7</sup> Battery is defined as applying force however slight to the person of another, hostilely or against his will. It is the application of force on a person without his consent and without legal justification. It includes striking, or touching a person in a rude, angry, revengeful or insolent manner.<sup>8</sup> Battering is the use of force against another, resulting in harmful or offensive contact. It is the unlawful application of force to the person of another.<sup>9</sup> Battery is also defined as the crime of attacking somebody physically.<sup>10</sup> Battery is defined as unlawful use of force on another person, including beating or offensive touching without the person's consent.<sup>11</sup>

Battery is both a civil wrong and a criminal offence. In other words, an action can arise in criminal proceedings as well as in civil cause. It is one of the torts of trespass to person along with assault and false imprisonment. Battery in civil matters has been defined as the inflicting of some degrees of force on a person negligently or intentionally.<sup>12</sup> The purpose of the law of battery is to protect the body of a person and its dignity from unlawful contact and violence by another person. Contact may be direct body to body contact, such as slapping, or giving a person a fist ball, grabbing hold of a person by the neck, beating up a person with hands, or kicking with feet etc.

In the above definitions of battery, it is clear that a person will need to prove application of force, and intention to apply force. Thus, an act does not amount to a battery unless it is done either intentionally or negligently.<sup>13</sup> Similarly, assault which is the act of the defendant which causes the plaintiff reasonable apprehension of the infliction of battery on him by the defendant<sup>14</sup> is often incorrectly used by laymen as battery which is the actual infliction of the force. In the law of torts, assault and battery are two different and separate torts as seen in the above definitions, but under the Criminal Code, the offence of criminal assault includes both assault and battery.<sup>15</sup> In the Penal Code, the crime of assault is provided separately while the crime of criminal force is the equivalent of battery.<sup>16</sup> Section 252 of the Criminal Code provides as follows:

A person who strikes, touches, or moves, or otherwise applies force of any kind to the person of another, either directly or indirectly, without his consent, or with his consent, if the consent is obtained by fraud, or who by any bodily act or gesture attempts or threatens to apply force of any kind to the person of another without his consent, in such circumstance that the person making the attempt or threat has actually or apparently a present ability to affect his purpose, is said to assault that other person, and the act is called an assault. The term 'applies force' includes the case of applying heat, light, electrical force, gas, odour, or any other substance of thing whatever, if applied in such a degree as to cause injury or personal discomfort.

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<sup>5</sup> P.S. Atchuthen Pillai, *The Law of Torts*, (8<sup>th</sup> edn, Lucknow, Eastern Book Company) 1997, pg 31-33

<sup>6</sup> J. Cooke, *Law of Tort*, (London, Pitman Publishing Co) 1994, pgs 156 & 213

<sup>7</sup> G. Kodilinye, O Aluko, *Nigerian Law of Torts* (Ibadan, Spectrum Law Publishing) 2009, pg 12

<sup>8</sup> E. Malemi, *Law of Torts* (Lagos, Princeton Publishing Co) 2013, pg 165

<sup>9</sup> B.A. Garner (ed), *Black's Law Dictionary*, *Op cit*, pg 173

<sup>10</sup> A. S. Hornby, *Oxford Advanced Learner's Dictionary of Current English*, pg 110

<sup>11</sup> Encarta Dictionaries microsoft, 2009

<sup>12</sup> *Esi v CNPC/BGP International & Anor*, (2014) LPELR-22807(CA)

<sup>13</sup> *Okekeanu v Tanko* (2002) LPELR-2437(SC)

<sup>14</sup> P.S. Atchuthen Pillai, *The Law of Torts*, *Op cit*, pg 33

<sup>15</sup> Sections 252, 253, 351-360 of the Criminal Code, Cap C38, LFN, 2004

<sup>16</sup> Section 263 and 264 of the Penal Code Act, (Northern States) Cap P3, Volume 13, LFN, 2004

**The Child-** A child has been defined as a boy or girl at any age between infancy and adolescence, a new born infant, a person of any age in relation to his parents.<sup>17</sup> A child is a person who has not attained the age of eighteen years.<sup>18</sup> A child is also defined as offspring of either sex of human parents, a son or a daughter, a young person of either sex at any age less than maturity but most commonly one between infancy and youth.<sup>19</sup> A child is defined as a person under the age of maturity.<sup>20</sup> A child is a person below the age of eighteen unless, under the law that applies to the child, majority is attained earlier.<sup>21</sup> A child is a person below the age of eighteen years.<sup>22</sup> A child is a person that has not attained the age of fourteen years and a young person is a person who has attained the age of fourteen years.<sup>23</sup> The Children and Young Person's Act defines a child as person under the age of fourteen years, while a young person is a person who has attained the age of fourteen years and is under the age of seventeen years.<sup>24</sup> The Constitution provides the age of maturity at eighteen years. It further provides that every citizen of Nigeria, who has attained the age of eighteen years residing in Nigeria at the time of the registration of voters for purpose of election to any legislative house, shall be entitled to be registered as a voter for that election, thus emphasizing age of maturity to be eighteen years.<sup>25</sup> The Trafficking in Persons (Prohibition) Act provides that a child means a person under the age of eighteen years.<sup>26</sup>

### 3. Causes of Child Battery

A child is commonly battered in Nigeria for the purposes of parental discipline or correction, and for punishment. According to custom, a child is usually raised by the parents or guardian in Nigeria, and in return the children have a duty not to disobey their parents. In cases of disobedience, the society believes that the child should be punished by scolding, canning, deprivations, beating, etc, depending on the gravity of the wrong and the age of that child. The law also allows such correction to a reasonable extent, for instance, the Criminal Code provides that a blow or other force, not in any case extending to a wound or grievous harm, may be justified for the purpose of correction as follows:<sup>27</sup>

- i. A father or mother may correct his or her legitimate or illegitimate child, being under sixteen years of age, or any guardian or person acting as a guardian, his ward, being under sixteen years of age, for misconduct or disobedience to any lawful command:
- ii A master may correct his servant or apprentice, being under sixteen years of age, for misconduct or default in his duty as such servant or apprentice:
- iii. A master of a ship may correct any person on board his ship who is bound to perform any manual labour, for misconduct or disobedience to any lawful command:
- iv. A father or a mother or guardian, or a person acting as a guardian, may delegate to any person whom he or she entrusts permanently or temporarily with the governance or custody of his or her child or ward all his or her own authority for correction, including the power to determine in what cases correction ought to be inflicted, and such a delegation shall be presumed, except in so far as it may expressly withhold, in the case of a school master or a person acting as a school master, in respect of a child or ward:
- vi. No correction can be justified which is unreasonable in kind or in degree, regard being had to the age and the physical and mental condition of the person on whom it is inflicted, and no correction can be justified in the case of a person who, by reason of tender years or otherwise, is incapable of understanding the purpose for which it is inflicted.

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<sup>17</sup> C.U. Arinze-Umeobi, *Domestic Violence against Women in Nigeria* (Onitsha, Folmech Printing & Pub Co. Ltd, 2008) p. 76

<sup>18</sup> Child's Right Act, 2003, Article 1

<sup>19</sup> I. Allen, *New Webster's Comprehensive Dictionary of English*, at www.duhaime.org, accessed on April 10, 2013

<sup>20</sup> B. A. Garner, *Black Law Dictionary* (8<sup>th</sup> edn, USA, West Publishing Co, 2004) p.254

<sup>21</sup> United Nations Convention on the Rights of a Child, 1989, Article 1

<sup>22</sup> African Charter on the Rights & Welfare of the Child, 1990, Article 11

<sup>23</sup> E.G. Akanio, *Introduction to Nigerian Legal System* (Lagos, Elcon Press Ltd, 1998) p.16

<sup>24</sup> Children and Young Person's Act, Cap LFN, 2004, Article 11

<sup>25</sup> Constitution of the Federal Republic of Nigeria, 1999 (as amended) section 29(4), 117(2), 77(2)

<sup>26</sup> Trafficking in Persons (Prohibition) Law Enforcement and Administration Act, 2003, sections 82 and 19

<sup>27</sup> Section 295 of the Criminal Code

Thus in allowing some standard of correction, the last paragraph bars unreasonable correction. Excessive and unreasonable physical punishment which is usually obtainable among parents and guardians and even school teachers are thus prohibited.

#### **4. Prevalence of Child Battery**

Battering in children is prevalent in Nigeria, in the home, school and in the society. This involves punching, beating, kicking, biting, burning, shaking, which could result to harming a child. The parent or guardian most times may not have intended to hurt the child; rather the injury often results from excessive discipline/correction or physical punishment. Many teachers in school had cautioned parents in many cases of battering, when the child appears in school with bruises and scars. Similar situations occur in the school and many parents have at several occasions arrested teachers for inflicting grievous bodily injuries on their children when chastising them. It has been observed that many schools as a result of these excessive corrections have adopted the practice of dialoguing and advising the child or giving minor punishments without inflicting physical force or violence.

The 2015 report on the survey on violence against children in Nigeria, carried out by the National Population Commission, with support from UNICEF and the US Centre for Disease Control and Prevention, revealed that millions of children suffered violence every year in Nigeria, and that one in two children experience physical violence. It was also reported in the survey that majority of the children do not tell anyone what has happened to them and fewer than five per cent receive the help they need to recover, and that violence against children is a problem that transcends social and economic status, impacting the rich and the poor, urban or rural, educated and out of school children, marginalised children, or children living in the shadow of conflict. Inspector General of Police, Arase, stated in September 2015 that looking at statistics, violence against children is more prevalent in the underdeveloped countries and Sub-Saharan African than other parts of the world. He further stated that records show that between January and August 2015, a total number of one hundred and thirty three cases of child violence involving one hundred and forty one victims were reported to the police, and that out of this figure, one hundred and twelve were conclusively investigated, while twenty one are currently under investigation; one hundred and fifty eight suspects were arrested, and one hundred and eighteen offenders were charged to court.<sup>28</sup>

#### **5. Effects of Child Battery and Legal implications**

Battering of the child has very devastating effects on the children as well as the society at large and could lead to the battered child syndrome.<sup>29</sup> Child battery can result in bruises, burns, poisoning, broken bones, deformation, serious health challenges, and poor mental and physical health, thoughts of suicide, running away from home, poor academic performance, depression etc. The United Nations Secretary General said that violence against children has become pertinent as beyond its negative impact on children and their families, violence weakens the very foundation of social progress, generates huge costs for society, slows economic development and erodes nations' human and social capital. Globally, an estimated US\$7 trillion is lost each year due to violence in childhood, equivalent to eight per cent of global GDP. He further said that in Sub-Saharan Africa, violence against children is estimated to cost US\$440 billion each year. He thus identified four fundamental goals which the federal government must pursue urgently if it must succeed in its recent fight on violence against children. These include a child focused, multidisciplinary and time bound national and state level strategy, an explicit ban on all forms of violence against children, backed by effective enforcement, increased efforts to make violence against children socially unacceptable and lastly the establishment of a sound data and research system.<sup>30</sup> In the same event, the Governor of Lagos State warned parents against meting any form of

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<sup>28</sup> E. Anuforo, 'Protecting Nigerian Children Against Violence' *The Guardian Newspaper*, Thursday 24<sup>th</sup> March, 2016

<sup>29</sup> A constellation of medical and psychological conditions of a child who has suffered continuing injuries that could not be accidental and are therefore presumed to have been inflicted by someone close to the child.

<sup>30</sup> Ban Ki-Moon was speaking through his special representative, Ms Martha Santos Pais at the launch of the Lagos State Government 's End Violence Against Child Abuse Campaign by the Ministry for Women Affairs & Poverty Alleviation in partnership with UNICEF, in Lagos State on February 25, 2016. Reported by Funmi

violence on children across the State, whether in the form of sanction or discipline. He further stated that sanctions must not be cruel or malicious, and thus everyone should not abuse children and give them inappropriate punishments in the name of enforcing discipline. The State Commissioner for Women Affairs stated that the launch of the 'End Violence against Children Campaign' in Lagos State is manifestation of the President Buhari's year of action to end violence against children project launched September 2015, which would be followed by intense sensitization and reorientation of both parents and children, and that every child should either feel free to walk into any family court to lay their complaint, or call on the ministry if they find themselves in any unpleasant situation for immediate rescue.<sup>31</sup> President Buhari at the launch of United Nations Year of Action to end Violence against Children in Nigeria, pledged to mobilise Nigerians to resist violence against children, and stressed on the commitment of his government to protect the children against emotional, sexual and physical violence. He promised to strengthen policies and programmes that protects children from violence, and that his government will enforce all relevant laws that will protect the Nigerian child from violence. He however noted that considering the findings on the survey conducted, a synergy is needed among government, civil society organisations, religious and traditional groups, the media, the private sector, communities, parents to tackle violence against children. In the same event, the Inspector General of Police described violence against children as a major social and law enforcement challenge with the global order, that the dynamics of children violence which manifests in form of physical violence, sexual violence and emotional violence impacts negatively on the child's future potentials, and national development, and a nation that cannot protect her children is an endangered nation, because the nation may be destroying the most valuable human resources base that would define and sustain her future. He stressed that the police under his leadership is determined to develop capacity and explore networks that will not only protect Nigerian children against violence, but ensure that deserved justice is served on offenders associated with violence against children in line with the dictates of our criminal law.<sup>32</sup>

## **6. Regulations and Policies relating to Violence (Child Battery) in Nigeria**

Nigeria has instituted various legislative and institutional measures at both Federal and State levels, aimed at addressing various forms of violence against children. It includes Child Rights Act (CRA) 2003, Trafficking in Persons (Prohibition) Law Enforcement and Administration Act 2003, Criminal Code applicable in the Southern States, the Penal Code applicable in the Northern States, Violence against Person's Act of 2015, Child Rights Laws of various States, various States laws on the rights of a child and other relevant national and international instruments. There are also some institutions charged with protecting the child from abuse and violence, and care of the child. These include the National and State Child Rights Implementation Committee, child development departments in the Federal and State ministries of Women Affairs, National Council of Child Rights Advocates of Nigeria, National Agency for the Prohibiting of Traffic in Persons, etc. In this work, we refer to those provisions of these laws that specifically address the issue of child battery.

Child Rights Act has made provisions to address all forms of violence against children including physical, sexual, and psychological violence, injury, abuse, neglect, or negligent treatment which takes place in the family, home, school, neighbourhood, workplace, street, and the community, among others.<sup>33</sup> The Act provides that every child is entitled to respect for the dignity of his person, and accordingly, no child shall be subjected to physical, mental or emotional injury, abuse, neglect or maltreatment, including sexual abuse; or subjected to torture, inhuman or degrading treatment or punishment; or subjected to attacks upon his honour or reputation; or held in slavery or servitude, while in the care of a parent, legal guardian or school authority or any other person or authority having the care of the child.<sup>34</sup> The Act provides that a child development officer, a police officer or any other person authorised by the Minister may bring a child before the court if he has reasonable grounds for

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Ajumobi, & Josephine Agbonkhese in *Vanguard* of Thursday 24<sup>th</sup> of March, 2016 in 'Ban Ki-Moon Identifies Panacea to Violence against Children in Nigeria'.

<sup>31</sup> Vanguard News, *Ibid*

<sup>32</sup> The Guardian Newspaper, *Op cit*

<sup>33</sup> The Child Rights Act, 2003, Parts, III, IV, V

<sup>34</sup> *ibid*, section 11

believing that the child has been neglected or ill-treated or battered by the person having the care and custody of the child.<sup>35</sup> It provides that no child shall be ordered to be subjected to corporal punishment.<sup>36</sup> In other words, pursuant to this provision, such an act will constitute battery in the absence of no specific provision for the punishment of those who administer corporal punishment to children in the Nigerian legal system. The Act provides for a family court which will operate at the high court and magisterial levels, and has been vested with the jurisdiction to hear all cases in which the existence of a legal right, power, duty, liability, privilege, interest, obligation or claim in respect of a child is in issue, or any criminal proceedings relating to any offence committed by a child, against a child or against the interest of a child.<sup>37</sup> Thus, Child Rights Act has provided a legal framework for the nation in the prosecution of perpetrators of child violence.

The Nigerian criminal law contains' provisions protecting children from abuse and sexual exploitation, and all other forms of violence against children.<sup>38</sup> Specifically, battery is an offence in the Penal Code, while in the Criminal Code, the offence of assault covers both assault and battery.<sup>39</sup> The Criminal Code makes provision for parental authority for the purposes of correction which constitutes an exception to the offence of assault, and thus raises the issue of the balance between children's right to be safe and free from physical injury and parent/guardian's right to discipline their children as they deem fit. However, the same section provides that no correction can be justified which is unreasonable in kind or in degree, regard being had to the age and the physical and mental condition of the person on whom it is inflicted, and no correction can be justified in the case of a person who, by reason of tender years or otherwise, is incapable of understanding the purpose for which it is inflicted. Battery is also a civil wrong under torts; hence any person who applies force on another person including a child, without his consent or without legal justification has committed a civil wrong and could be sued in court for battery. Thus once an application of force is proved, along with intention to apply force or negligence, it is sufficient.<sup>40</sup>

Complaints concerning child battering and any case of violence against children can be laid in the family courts, office of special rapporteur on children in the National Human Rights Commission, child welfare office of the ministries of women affairs, child/family welfare department in the police stations, and the offices of several other institutions and civil society organisations for child protection. These government institutions and civil society organisations are to work effectively in various ways for the prevention and eradication of violence against children through policies, prevention strategies, commitment, advocacy, creating awareness, survey and report, rehabilitation and treatment of victims, rendering of services etc. In a bid to show commitment to action, Nigeria launched the United Nations Year of Action to End Violence against Children in Nigeria in September 2015, and Lagos State immediately followed in the campaign in February 2016.<sup>41</sup>

Looking at what obtains elsewhere, in the United States of America for instance, child abuse which includes violence on children is provided in Federal and State laws. At the State level, both civil and criminal statutes make provisions for child abuse. The Child Abuse Prevention and Treatment Act provides for child abuse and neglect at the federal level.<sup>42</sup> States recognise different types of abuse in their definitions, including physical abuse, neglect, sexual abuse, emotional abuse. Physical abuse is generally defined as any non-accidental physical injury to the child and can include striking, kicking, burning, or biting the child, or any action that results in a physical impairment of the child, sexual abuse, and emotional abuse. However, some States like California, Colorado, Florida, Indiana, Texas, Ohio, etc provide an exception to that provision, stating that physical discipline of a child, as long as it

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<sup>35</sup> *ibid*, Section 50(1)(b)

<sup>36</sup> *Ibid*, Section 221(1)(b)

<sup>37</sup> Child Right's Act, 2003, Sections 149-151

<sup>38</sup> Criminal Code, *Op cit* Sections 223 -225 and Penal Code, *Op cit* Sections 278-280

<sup>39</sup> Criminal Code Sections 252 and 295 and Penal Code, Sections 263 and 264

<sup>40</sup> *Okekeanu v Tanko* (2002) LPELR- 2437(SC)

<sup>41</sup> *Guardian and Vanguard News Papers, Op cit*

<sup>42</sup> CAPTA Reauthorisation Act of 2010

is reasonable and causes no bodily injury to the child, is an exception to abuse. In addition to defining what amounts to abuse, State statutes also provide specific persons who can be reported to child protective services as perpetrators of the abuse, and they include parents, guardians, foster parents, relatives, or other care givers responsible for child welfare.<sup>43</sup> All States have enacted laws and policies that define State roles and responsibilities in protecting vulnerable children from abuse and neglect. Issues addressed in these statutes include mandatory reporting, screening reports, proper maintenance, and disclosure of records, protecting children from violence etc.<sup>44</sup>

## 7. Conclusions

Violence against children in Nigeria which includes child battering has generated a lot of concern and worry. Legal framework, institutional framework, civil society roles, children actions, policies, programmes and strategies have been adopted to address this issue. Child battery as form of violence encountered by children is a worrisome issue because it is perpetrated by people who take care of the children justifying their actions with correction and discipline of the child. There should be moderation and reasonableness in effecting such corrections as provided in the law; excessive measures inflicting injury is battery. It is therefore pertinent that Nigeria adopt the practice available in other jurisdictions and the recommendations of the Secretary General of the United Nations stated earlier. This involves effective social welfare services for the care of victims of violence in various States of the federation, and promotion of the punishment of perpetrators of such violence, ensuring the establishment of the family courts in every State of the federation. There is also need to maintain an efficient and effective survey and report system for proper monitoring of government institutions. Adequate policies and strategies, prohibition of cultural or customary practices or factors that bring about violence against children, enforcing strategies to tackle the societal and emotional factors that restrain the children from reporting such cases of violence are germane. Governments should also address legal measures and framework that delay the timely delivery of justice of cases of violence against children, adoption and implementation of the Child's Right Act in all the State of the federation; awareness and education programmes for parents, guardians, caregivers, school teachers, relations on the rights of the child and the need to prevent child battery as well as other forms of violence against children. Government response and commitments towards their promises and effective synergy of all stake holders to ensure that the Nigerian child is saved from battery and all forms of violence is also congenial.

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<sup>43</sup>Child Welfare Information Gateway, at [http://www.childwelfare.gov/systemwide/laws\\_policies/statutes/define.cfm](http://www.childwelfare.gov/systemwide/laws_policies/statutes/define.cfm), accessed on 20<sup>th</sup> April, 2016

<sup>44</sup> Child Welfare Information Gateway, 'Laws and Policies' <http://www.childwelfare.gov>, 2016. Accessed on the 20<sup>th</sup> of April, 2016