

Comments of the National Centre for Human Rights on the Draft Bylaw on Aftercare for Shelter Home Leavers of 2025

Issued pursuant to the provisions of Article (10) and Article (26) of the Social Development
Law No. (4) of 2024

Article of the draft Regulation	Comments of the National Centre for Human Rights	Human rights justification
Article (2) Definitions	1. "Graduate": add the phrase "including any person who has completed his or her residence in a shelter home for any lawful reason, without requiring the attainment of a specified age, whenever his or her circumstances call for the continuation of care". 2. Add a definition of the term "legal assessment of the concept of case management".	To prevent the exclusion of vulnerable groups on grounds of age or by reason of a narrow interpretation.
Article (5) Original text	Provide expressly for the right of the graduate to access his or her own data.	The Article advances digital transformation and case management, while safeguarding the rights to privacy and transparency.
Article (6) Original text	It is necessary to provide expressly for the phrase "the consent of the graduate".	Respect for human dignity and personal autonomy.
Article (7) Original text	Provide for criteria of competence and experience for the case manager.	The absence of any specification of the qualifications of the case manager may adversely affect

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		the assurance of service quality.
Articles (9) and (10) Original text	1. Insert a provision guaranteeing the presence of a representative of the graduates themselves. 2. Add the Safety Fund for the Future of Orphans and the Children's Villages Association (SOS), and include the Ministry of Higher Education alongside the Ministry of Education, using the officially approved designations.	Giving effect to the right of stakeholders (the recipients of the service) and of persons with relevant expertise to participate.
Articles (11–15) Original text	These Articles constitute the operational framework for aftercare. Proposed amendments: (a) Set maximum time limits for the delivery of services. (b) Subject funding to the principles of transparency and integrity.	To ensure the sustainability of funding and to establish clear time-bound obligations, so as to prevent arbitrariness and guarantee fairness.
Articles (16–18) Original text	Provide for clear, precise and objective criteria governing extension or termination.	Discretionary power must be constrained by safeguards in order to prevent discrimination and ensure equality.
Proposed Article	A provision is required to address the situation of beneficiaries who graduated before the issuance of the Regulation and whose age has exceeded eighteen (18) years.	To ensure the comprehensiveness of aftercare.