



Proactive Release

Submissions on the Child and Youth Wellbeing Strategy

August 2019

The Department of the Prime Minister and Cabinet has released the following submission received during its public consultation on the child and youth wellbeing strategy.

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- Where this is the case, the information has been withheld, and the relevant section of the Act that would apply, has been identified.
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Save the Children Child and Youth Wellbeing Strategy Submission

Save the Children:

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Geographical location	National and international
Target group/focus	Children
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Our Organisation: Save the Children was founded in 1919 and is the world's leading independent organisation for children. We work in 120 countries to save and improve the lives of children around the world.

Vision: Save the Children's vision is a world in which every child attains the right to survival, protection, development and participation.

Mission: We work to inspire breakthroughs in the way the world treats children and to achieve immediate and lasting change in their lives.

Save the Children New Zealand was established in 1947 in Christchurch. We work to uphold the rights of children both in New Zealand and overseas.

Our Ambition: We want the world to put children and young people at the heart of its action to reduce poverty; to strengthen the low and insecure incomes that prevent children surviving, learning and being safe; and thereby stop the transmission of poverty to future generations.

Introduction

Aotearoa New Zealand is a nation of great beauty that although small, we have much to be proud of. Among other successes, New Zealand women were the first women in the world to attain the right to vote¹, in the 1930s we established one of the first social security systems in the world², and we were the first English speaking country to abolish all forms of physical punishment legally protecting all children from assault³.

However not all people, including children and youth, enjoy the same standards of living and wellbeing that we expect in New Zealand. Whilst many children in Aotearoa do well, there are too many on the wrong side of the statistics; enduring inequality for Maori and Pasifika, high rates of youth suicide, high rates family violence, high rates of homelessness, children struggling to access the health care they need, growing disparities in education, and far too many children living in poverty.

Save the Children supports the establishment of New Zealand's first Child and Youth Wellbeing Strategy (the Strategy) as a means to commit to confronting and tackling these issues, and to ensure the wellbeing of all children and youth in Aotearoa New Zealand. We

¹ <https://nzhistory.govt.nz/politics/womens-suffrage>

² https://www.maxim.org.nz/looking_back_to_look_forward_how_welfare_in_new_zealand_has/

³ <https://www.savethechildren.org.nz/assets/Files/Reports/STC-Childrens-Report-DIGITAL.pdf>

support the Strategy applying to all children up to 18 years of age, and young people up to 25 years of age transitioning from State care.

We acknowledge the Department of the Prime Minister and Cabinet in developing and committing to establishing a Child and Youth Wellbeing Strategy that has the intention to use an evidenced based approach to develop a long-term vision for the wellbeing of all children and youth, including those living in poverty or more general socio-economic disadvantage. Furthermore, we support the intention of the Strategy to contain specific actions to improve outcomes across a range of areas, such as health, education and income adequacy, and the delivery of universal services that may be intensified to support specific individuals or groups of children that require greater support.

We acknowledge the current Coalition Government's commitment to improve the wellbeing of all children and youth in Aotearoa New Zealand. The Strategy along with legislation, policy and practice that advances the rights and wellbeing of children and youth, is core to fulfilling that commitment.

A commitment to children and youth

The Strategy is a strong commitment from the Government to provide leadership, commit resources, and be accountable for reducing child poverty and to improving the wellbeing of our children and youth. Furthermore, it signals a willingness to give higher political priority to children and an increasing sensitivity to the impact of governance on children and their human rights.

It is important this commitment is backed up by the allocation of resources including direct allocation of budget to give effect to the Strategy in the Government's first Wellbeing Budget – 2019. Further to this, it is essential there is a strong plan put in place to disseminate the Strategy to all levels of society.

Whilst we support the intentions of the Strategy, we are of the view the Strategy will remain an intention if it is not supported by a robust plan of action to be fully operationalised. Whilst government are ultimately responsible for leadership, resourcing and implementation of the Strategy, it will never reach its intended potential without a whole of society commitment. This means there is much to be done to bring the people of Aotearoa on board to support, believe in, and actively implement the strategy. Wider society must include; Government, public servants, the business sector, professionals working with and for children, parents, families and whanau, NGOs and social service providers, and children and youth themselves.

An effective dissemination plan will include training and education on the Strategy and children's rights. The Government has an obligation to develop training to educate and inform those involved in the implementation process of the Strategy which will give effect to children's rights. Furthermore, it is essential children and young people themselves

receive education about the Strategy and their rights to support their agency in fulfilling the Strategy and realising their rights⁴.

The Strategy will need to include arrangements for monitoring and continuous review, for regular updating and for periodic reports to parliament and the public.

Te Tiriti o Waitangi

We support the inclusion of Te Tiriti o Waitangi in the principles of the Strategy, and that the foundational role of Te Tiriti and the importance of the Crown-Maori partnership is acknowledged.

The UN Convention on the Rights of the Child

We support the inclusion of the UN Convention on the Rights of the Child⁵ in the principles underpinning the Strategy. Further to this, Save the Children recommends the Convention provides a comprehensive framework against which the progress of the Strategy can be measured.

The Strategy has the potential to fulfil the recurring recommendation of the Committee on the Rights of the Child⁶ for New Zealand to, 'Adopt a comprehensive policy and strategy for the implementation of the Convention and its first two Optional Protocols. They should be developed in cooperation with the public and private sectors involved in the promotion and protections of children's rights in consultation with children and based on the child-rights approach. Such a policy should encompass all children in the State party and all areas covered by the Convention; be supported by sufficient human, technical and financial resources; include clear and adequate budgetary allocations and a time frame; and incorporate follow-up and monitoring mechanisms.'⁷ We recommend the Strategy does fulfil this recommendation, and that Government takes all actions required to enact the Strategy in this capacity.

It is extremely positive that the Government recognises the Strategy's ability to progress New Zealand's commitment to the UN Sustainable Development Goals (SDGs)⁸, the UN Convention on the Rights of the Child (the Convention)⁹, the Convention on the Rights of

⁴ The UN Convention on the Rights of the Child, retrieved from <https://www.refworld.org/docid/4538834f11.html>

⁵ General Comment No. 5, retrieved from <https://www.refworld.org/docid/4538834f11.html>

⁶ The Committee on the Rights of the Child, retrieved from <https://www.ohchr.org/en/hrbodies/crc/pages/crcindex.aspx>

⁷ Concluding observations on the fifth periodic report of New Zealand, retrieved from https://tbinternet.ohchr.org/Treaties/CRC/Shared%20Documents/NZL/INT_CRC_COC_NZL_25459_E.pdf

⁸ The Sustainable Development Goals, retrieved from <https://sustainabledevelopment.un.org>

⁹ The UN Convention on the Rights of the Child, retrieved from <https://www.refworld.org/docid/4538834f11.html>

Persons with Disabilities (CRPD)¹⁰, the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), and other related international obligations.

The Strategy supports the Government's requirement to undertake all possible measures toward the realisation of the rights to the child, paying special attention to the most disadvantaged groups¹¹.

In relation to this requirement and Article 2 of the Convention¹² that the Strategy is implemented without discrimination of any kind, thought must be given on how the Strategy will be realised for specific groups of children. For example, tamaiti, tamariki and rangatahi Maori, Pasifika children, LGBTQI and intersex children, migrant and refugee children, children with disabilities, children in care and protection, children with long term illnesses, children living in poverty or socio-economic disadvantage.

Further to this we recommend a statement in the Strategy is included that acknowledges all children must have their rights upheld if their wellbeing is to be ensured.

Recommendations to strengthen the content of the Strategy

Vision – We support the Vision of the Child and Youth Wellbeing Strategy

Wellbeing Domains – We support the five wellbeing domains

Desired Outcomes – We support the Desired Outcomes that sit under the Wellbeing Domains.

- We recommend an amendment to the DO under 'are happy and healthy' with inclusion of mental health. Amend to read, *'Children and young people have the best physical and mental health, and health status is not a barrier to living a good life.*
- We recommend an amendment to the DO under 'are learning and developing', the final point be amended to read *'Young people make positive choices about alcohol, drugs and sexual relationships (remove and avoid criminal offending) that supports the survival and development of themselves and others'.* We recommend removal of 'avoid criminal offending', it is our view that good decision making is essential to the survival and development of an individual and those around them. If an individual is making good decisions it will go far to prevent them being involved in criminal offending, however we do not believe this should be the main focus of this desired outcome.
- We are concerned that the essence of the Desired Outcomes is not always captured in the text of the Focus Areas. We feel that the language of the Focus Areas would be strengthened by taking a rights-based approach and using language that articulates that approach.

¹⁰ The Convention on the Rights of Persons with Disabilities, retrieved from <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>

¹¹ General Comment No. 5, retrieved from <https://www.refworld.org/docid/4538834f11.html>

¹² The UN Convention on the Rights of the Child, retrieved from <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

The Principles – We support the seven principles that underpin the Strategy. We recommend an amendment to Principle 6 to read, *‘The rights contained in the United Nations of the Rights of the Child, which New Zealand has ratified, realising the rights of every child.’*

The Focus Areas

Focus Area 1

- We recommend the inclusion of the word ‘safe’ bullet point one. This would be amended to read, *‘Children and young people live in safe and loving homes, connected to relationships and support and are free from abuse, neglect and family violence.’*

Safe homes are critical in ensuring children’s survival and development. Safety should be considered to encompass mental, physical and emotional safety.

Focus Area 2

- We recommend the inclusion of safety at home and at work in the introductory text; reword to read, *‘Children’s and young people’s physical safety is protected during everyday activities at home, at work, during travel and recreation’*

We recommend including the following bullet point:

- *Children and young people are protected from serious injury and death at home and in the workplace*

Focus Area 3

We recommend the inclusion of digital citizenship as part of positive interactions with others. Whilst online safety is essential it does not go far enough to encompass the ways children and young people use the digital environment to interact with others.

- We recommend bullet point three being reworded to read, *‘Children’s and young people’s digital citizenship and safety online is supported’*

Focus Areas 4 and 5

No recommendations

Focus Area 6

We recommend including reference to the ability to access services when needed. Often parents are fully aware of the support they need for their children but due to poor service delivery, i.e. a shortage of hospital beds, or inability to see a paediatrician due to long waits, they are unable to access these critical services.

- We recommend bullet point three be reworded to read, *‘Core services and systems like health, education, justice and social support are designed and delivered in ways that meet diverse needs, that minimise the costs and stresses of engaging with them and can be accessed urgently when needed’*

Further to this we don’t see identification of disadvantage being the primary issue, it is more that services have flexibility to provide greater supports to children that may be experiencing some form of disadvantage.

- We recommend bullet point four be reworded to read, '*Universal services have the flexibility to focus proportionately greater resources effort and energy supporting children and young people facing disadvantage*'

Focus Area 7

We recommend this Focus Area would be strengthened by explicitly referencing sexual orientation and gender.

- We recommend bullet point two is reworded to read, '*No child or young person, or group of children and young people, faces discrimination or stigma on the grounds of ethnicity, disability, sexual orientation, gender or for any other reason*'

Focus Area 8

We recommend this focus area would be strengthened with greater focus on inclusion and acceptance, and that Te Ao Maori and Te Reo Maori are promoted and widely accessible.

- We recommend bullet point two be reworded to read, '*Te Ao Maori and Te Reo Maori are actively promoted and widely accessible*'
- We recommend bullet point three be reworded to read, '*Children and young people feel proud of their culture and values, and see their cultures included and accepted in New Zealand society*'

Focus Area 9

Opportunities and support for children and young people to be civically engaged is very positive. It is our view that children and young people are already very environmentally aware and conscious of the need to protect our environment. This could be more strongly reflected here. We also feel that there should be a commitment from adults and decision makers to ensure that every effort is made to ensure children have a sustainable and healthy environment to live in now and in to the future.

We recommend a bullet is included to reflect this:

- '*Adults and decision makers commit to undertake every effort to ensure children and young people live in healthy and sustainable environments now and in to the future*'

Focus Area 10

Healthy lifestyles, and the ability and opportunities to make healthy decisions are essential to wellbeing. We would like to see greater recognition of mental and emotional health in this area as the three are inextricably linked.

We recommend bullet point two be reworded to read, '*Communities offer access to affordable, nutritious food and environments that enable children and young people to be physically active, and mentally and emotionally included*'

Focus Area 11

The aspirations for children with disabilities needs to be considerably strengthened. It is our view the word 'improved' sets a reasonably low bar, and as a society we must do markedly better for children with disabilities.

- We recommend Focus Area 11 text is reworded to read, '*Children and young people with disabilities are assured of equitable opportunities and outcomes*'

Focus Area 12

The mental health and wellbeing of children and young people is critical. We are currently seeing unprecedented levels of self-harm and presentation of mental-health illnesses or disorders. We are supportive of the content of this focus area but would like to see an inclusion of the need for parents and carers to be supported to help their children and young people who are in mental distress and or may be self-harming. Increasingly parents are desperately seeking support and tools so they can help their children facing these issues.

We recommend the inclusion of bullet point:

- *Families are provided with support and tools to help their children in times of mental health distress, illness or self-harm.*

Focus Area 13

The agency and decision making of children and young people are essential to the wellbeing of themselves and others.

- We recommend bullet point two be reworded to read, *'Children and young people consider the impact of their behaviour on others, and themselves'*

Focus Areas 14 and 15: We recommend ages are amended to better reflect the intended outcomes for the ages and stages of children.

- We recommend Focus Area 14 be amended to *'Birth to around 3 years or 36 months'*, and Focus Area 15 be amended to *'three to six years'*

Focus Area 14 strongly focuses on pregnancy, maternal wellness and mental health, and care for babies and infants. Whilst we strongly support the recognition of healthy pregnancy, we request reference to *'choices'* be removed so as to not confuse the issue with women's rights to autonomy of their own body and or Abortion Law reforms.

- We recommend that bullet point one be removed, *'People make positive, empowered choices about when to have a family'*. Our view is that this issue sits outside of the Wellbeing Strategy for Children and Youth as this strategy is for children whether they result from planned or unplanned pregnancies.
- We recommend bullet two be amended from *'The environment around parents helps them to make positive choices for pregnancy, birth and parenting'* to read *'A positive environment is crucial in supporting pregnancy, birth and parenting'*.

Furthermore, we are concerned crucial elements of development outcomes for the babies and infants themselves are missing. It is the early experiences in a child's life that lay the foundations for later development¹³¹⁴.

The early years are a critical time in a child's development, we recommend the focus of this period is extended up to three years or 36 months of age.

We recommend including the following bullet points:

¹³ Lighting up young brains

¹⁴ Early Moments Matter UNICEF

- *Babies and children have healthy nutrition to nurture their bodies and brains, including breastfeeding up to at least 6 months of age.*
- *Children are learning and developing through play*
- *Parents and carers have easy access to the information they need to support their parenting through pregnancy to 36 months.*
- *Quality relationships and time spent as a family will support babies, infants and toddlers' cognitive and emotional development.*
- *Babies, infants and toddlers are supported with the highest quality healthcare when they need it.*

Focus Area 15

Bullet point 1 is highly applicable to **both** Focus Areas 14 and 15, as such this bullet point should be included in Focus Area 15:

- *'Parents, families, whanau and communities are supported to provide loving, stimulating environments for children to develop and learn'*

Loving and stimulating environments are essential from birth and have a crucial impact on the brains of babies, infants and toddlers. Evidence shows that a child's environment and experiences in the first three years of life play a crucial role in their brain development¹⁵.

Bullet point 2, *'Children build resilience, self-control and mental wellbeing'*

- The expectation that children 24-36 months build self-control is problematic. Post 36 months children start to develop and display self-control behaviours more consistently. However, up to three years of age challenging behaviour is common whilst children learn to self-regulate¹⁶ their emotions and behaviours.

Bullet point 4 is highly applicable to both Focus Areas 14 and 15.

- *'Children benefit from high quality early learning,' we recommend that learning through play is included in this bullet point to read, 'Children benefit from high quality early learning with regular opportunities to learn through play.'*

Early childhood care and education is playing an increasingly significant role in children's development. Many parents are in work and therefore require care out of the home for their babies. There are large numbers of children under 24 months of age in early child care and education. It is essential that play is recognised as being central to their learning and development.

We recommend including the following bullet points:

- *Children have healthy nutrition to nurture their bodies and brains*
- *Children are learning and developing through play*
- *Quality relationships and time spent as a family will support children's cognitive and emotional development.*

Focus Area 16

No recommendations

¹⁵ <https://www.savethechildren.org.uk/content/dam/global/reports/education-and-child-protection/lighting-up-young-brains.pdf>

¹⁶ <https://www.zerotothree.org/early-development/challenging-behaviors>

Child Poverty Action Plan

We support the proposed development of a Child Poverty Action Plan¹⁷ to ensure that children living in poverty or socio-economic hardship will achieve the intended wellbeing outcomes outlined in the Strategy. We recommend the plan sits below the overarching Strategy. In this way, the plan is focussed on actioning the Strategy for children in poverty or socio-economic hardship, rather than developing a separate set of goals thereby increasing the risk of separating this group of children from the wider population of children and youth.

Conclusion

As stated earlier in this submission, for the vision and outcomes of the Strategy to be realised, a robust and well-resourced plan of implementation must be developed and operationalised at all levels of society; central and local government, the business sector, professionals working with and for children, communities, whanau, families and children and young people themselves.

We thank the Government for the opportunity to share our expertise in this submission with the view to working together to realising the vision that all children and young people in Aotearoa New Zealand will have their rights met thereby ensuring their wellbeing.

¹⁷ Child Poverty Action Plan referenced in <https://dpmc.govt.nz/publications/cabinet-paper-child-wellbeing-strategy-scope-and-public-engagement-process-may-2018>