



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.

Some of the information contained within this release is considered to not be appropriate to release and, if requested, would be withheld under the Official Information Act 1982 (the Act).

- 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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Submission on the proposed Child and Youth Wellbeing Strategy

December 2018

To the **Department of the Prime Minister and Cabinet**

This submission is from:

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Child Poverty Action Group (CPAG) is an independent charity that strives to achieve the elimination of child poverty in Aotearoa New Zealand. We work to provide evidence about the causes and effects of poverty on children and their families, and to inform the public, policy makers, media and politicians of the changes to policy needed to reduce child poverty. CPAG believes that New Zealand's high rate of child poverty is due to policy neglect and a flawed ideological emphasis on economic incentives. Through research, CPAG highlights the position of tens of thousands of New Zealand children, and promotes public policies that address the underlying causes of the poverty they live in. Our vision is for an Aotearoa where all children can flourish, free from poverty.

We would like the opportunity to speak to our submission in person.

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Introduction

[Child Poverty Action Group \(CPAG\)](#) welcomes the Department of the Prime Minister and Cabinet's intention to put into place a Child and Youth Wellbeing Strategy, which "will set the direction for how to improve the wellbeing of children and young people in New Zealand". Such a strategy will be a significant development for all children and young people in Aotearoa, and for our society as a whole.

The current coalition Government's commitment to developing a Child and Youth Wellbeing Strategy provides a critical opportunity to embed in New Zealand legislation, policy and practice the guiding principles and rights that all children are entitled to under the United Nations Convention on the Rights of the Child (UNCROC), and should provide an overarching framework with which to improve wellbeing across Aotearoa as a society. It is commendable that the Proposed Outcomes Framework includes outcomes for wider families and whānau. Parental health and wellbeing, including material wellbeing, is fundamental to the health and wellbeing of their children. For that reason any Child and Youth Wellbeing Strategy must extend in scope beyond the immediate needs of children, and into the wider societal issues that impact on the wellbeing of all children.

A wider scope would include addressing the trauma of intergenerational poverty, and provide reparations for marginalised groups that have been most affected. Māori and Pasifika families are represented highly among the numbers of families living in income poverty compared to other ethnicities, and are among those who have experienced disadvantage as a result of economic and social changes in the past three decades, as well as of the ongoing impacts of colonisation. CPAG recommends that revisions to the outcomes framework should have a clear link to Te Tiriti o Waitangi, and United Nations Rights Conventions such as UNCROC, UNDRIP.

A wider scope for a wellbeing framework would include improving programmes for prevention of drug and alcohol abuse. It would prioritise legislation reform, and have a focus on prevention of criminal incarceration of young people, adults, and parents, and address the need for improved and accessible rehabilitation and care.

A wider scope would also involve efforts to change the narrative around people who need welfare assistance and to re-establish the value of unpaid caregiving as an important contributor to both social and economic wellbeing of Aotearoa. Parents should be able to provide care for their children unburdened by the impacts of poverty which have known links to poor outcomes in later life, including outcomes in education, health, employment. Children raised with hardship are more likely to leave school earlier, become parents sooner, and they may be more likely to become involved in criminal activity.

For a child, a healthy and safe experience of their first three years of life is critical to their outcomes. For this reason, a Child and Youth Wellbeing Strategy must include ensuring that the needs are met in the home and that maternal healthcare is prioritised prior to, and after a child's birth.

CPAG supports the 16 focus areas of the proposed outcomes framework but shares concern with the wider Child Wellbeing Network of organisations, that there is no mention of the mechanisms that will be used to support these at implementation level, nor has there been a proposal for any framework for tracking and monitoring the success of the Child and Youth Wellbeing strategy over time. This should include tracking and monitoring by children and young people themselves, and their families and whānau, based on their own lived experience.

CPAG supports the call by the wider Child Wellbeing Network of organisations for an additional 'Enabling settings and processes' layer to be added to the proposed outcomes framework, between the 'principles' layer and the 'desired outcomes' layer. This layer would include aspects such as:

- a. Government Budget and investment
- b. Government and community resources
- c. Community-based capability and capacity
- d. Partnership between Government and communities and community-based organisations
- e. Legislation, policies and practices that promote and protect children's rights
- f. Cross cutting policies (e.g. including data protection policies, privacy settings, etc)
- g. Child rights and wellbeing training (to support and enable implementation of the Strategy)
- h. Mechanisms to enable children to participate in matters affecting them

Comments and recommendations on "Desired outcomes"

Desired outcome 1: Children and young people are safe and nurtured in their families, whānau and homes.

1. CPAG supports the focus areas under this desired outcome and shares agreement with the wider Children's Wellbeing Network of organisations that the first bullet point be amended to read 'live in *safe* and loving homes'.
 - a. There should be no assumption that children are not living within homes where they are loved, but their experiences and quality of life may be negated by having a lack of safety within those homes. For a child, to be safe means to have sufficient boundaries, to be free from abuse and harm, and to have all their basic needs met and to live in an environment that supports good health. Poverty is a precursor to many factors that negate a child's safety, and for that reason mechanisms must be put into place to ensure that household income is sufficient to ensure that a safe environment is established and sustained.
2. CPAG recommends that the mechanisms to ensure that all children have a safe and nurturing home life include:
 - a. Ensuring that all families have income adequacy by reforming the welfare system such as through substantially increased benefits and minimum wage - see [CPAG's recommendations for welfare reform](#).¹

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<https://www.cpag.org.nz/assets/1811%20CPAG%20WFFF%20recommendations%20FINAL%20WEB.pdf>

- b. Housing should be fit for purpose, stable, secure, free from overcrowding and affordable. See CPAG's recommendations for [A New Zealand where Children can flourish: Priorities for family housing](#).²
- c. Families/Whānau have access to timely and appropriate healthcare, including mental healthcare, without experiencing cost barriers.
- d. Maternal healthcare, including mental healthcare, is prioritised before a child is born. See [CPAG's recommendations for improved healthcare policy](#) that prioritises maternal mental health as well as improved and accessible services.³
- e. Care environments outside the immediate family should be culturally appropriate and sensitive to a child's cultural needs. CPAG supported ensuring the "whānau first" provisions should remain in the Children, Young Persons and Their Families (Oranga Tamariki) Legislation Bill⁴. Effective monitoring and complaints processes should be in place for such arrangements.

Desired outcome 2. Children's and young people's physical safety is protected during everyday activities like travel and recreation.

1. CPAG supports this desired outcome and recommends education be included in the focus areas. All care and learning environments should be supported adequately to ensure that all children have access to safe play and learning environments. Schools should have appropriately qualified support workers to provide care for children with disabilities so that they are able to participate fully without risk of harm.
2. CPAG also shares agreement with the wider Children's Wellbeing Network of organisations that the focus areas should include children in work, and that the second bullet point should be amended to include injury and death of children at home.

Desired outcome 3. Children and young people have positive interactions with peers and others outside the home.

1. CPAG supports the focus areas for this desired outcome and suggests it could be improved by the addition of removal of barriers to children's participation outside the home. For many families, cost is a substantial barrier for children to participate with their peers outside the home, and many children may be impacted by the stigma of poverty as a result of this barrier. The stigma of poverty may cause long-term harm, including to self-esteem, and may be a barrier to participation in other activities such as paid employment later in life.
2. A mechanism to support children's healthy participation alongside their peers outside of the home could include initiatives such as free or low-cost team sports, clubs and other community-run, Government-funded initiatives aimed at providing healthy extracurricular engagement by children and young people.

² https://www.cpag.org.nz/assets/170727%20CPAG%20Housing%20prioritiesCS6_V2.pdf

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https://www.cpag.org.nz/assets/170512%20CPAG%20Reducing%20the%20health%20risks%20for%20children%20backgrounder_v2.pdf

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<https://www.cpag.org.nz/assets/170301%20CPAG%20Submission%20on%20Oranga%20Tamariki%20Bill%202.pdf>

Desired outcome 4. Children and young people and their families and whānau live in affordable, quality housing.

1. CPAG supports the focus areas under this desired outcome and recommends that, in particular mechanisms must be put into place to ensure housing is adequate, available and affordable. Moreover it must be secure, so that children and families do not suffer the burden of frequent, expensive moves that impact on their livelihoods and children's education opportunities.
2. CPAG recommends that the Government should instate a comprehensive Housing Warrant of Fitness that provides a standard across all features of housing that landlords must comply with.
3. Alongside a comprehensive WOF, CPAG recommends an overhaul of the Residential Tenancies Act so that tenants have more rights and security of tenure. See [CPAG's submission on the proposal for reform](#).⁵
4. CPAG recommends that a range of housing options be implemented, such as share equity schemes for low-income families so that they may be able to become housing secure and foster a sense of belonging to their communities.
5. A social Housing Plan should be developed within 12 months, that is based on realistic forecasts for future demand for social housing and that budgets are allocated to fund this plan over at least a ten year period.

Desired outcome 5. Child poverty is reduced, in line with the Government's intermediate and ten-year targets

1. CPAG supports the principle of reducing poverty and recommends that the Government prioritise policy changes that ensure long-term and sustained reductions in poverty such as through addressing the inadequacy of current benefit levels, and in-stating annual indexation of family tax credits and welfare benefits with a link to wages inflation. It is important to the focus area of "Parents' education and participation in paid work is supported, where appropriate" to add a link to the focus area of **Desired outcome 1**, specifically that "the work of parenting and nurturing children is recognised, valued and supported". Barriers to obtaining paid work such as the cost of child care and unsuitable hours and conditions should be identified and provisions made so that the choice for a parent to provide primary care for children, especially for those under age three, can be made without the burden of poverty. Sole parent families, for whom paid work may pose a greater stress, should have access to the Working for Families In-Work Tax Credit without the restrictive paid-work hours criteria.
2. CPAG's recommends the adoption of welfare reforms to ensure families have income adequacy. CPAG's recommendations are included under **Desired outcome 1**.
3. A review of childcare subsidy thresholds should be undertaken. Despite the increase in amount of subsidy, earnings thresholds have not been increased since 2007, meaning they are available to fewer families, and do not reflect the increases in costs of living and housing incurred since that time. Childcare subsidies should be looked at more closely for their rate of uptake and impact for low-income working families.
4. CPAG recommended in its [submission on the Child Poverty Reduction Bill](#)⁶ that closer attention should be paid to those families whose incomes fall far below any of the primary measures set out in the draft Bill.

⁵ <https://www.cpag.org.nz/assets/181024%20CPAG%20Submission%20to%20the%20RTA%20-%20Oct18.pdf>

Desired outcome 6. Children and young people experience improved equity of outcomes, with services helping address the impacts of poverty, low socioeconomic status and disadvantage.

1. CPAG supports the focus areas under Desired outcome 6 and recommends the adoption of welfare reform recommendations, and health policy recommendations referred to under **Desired outcome 1**.
2. CPAG recommends that barriers to an equitable education be removed, such as the 'hidden costs' of a free education that include trip costs, voluntary donations, school uniforms and other equipment costs and examination fees that may be unaffordable for many families.
3. Bridging programmes for work and/or tertiary training opportunities should be available across all schools and at all deciles so that all students, including those who face learning barriers, or who may have disabilities, have access to a range of options that lead to opportunities later in life.

Desired outcome 7. Children and young people are free from racism, discrimination and stigma.

1. CPAG supports the inclusion of the focus areas under this desired outcome and recommends that children should be free from the impacts of any discrimination against their caregivers. In particular, the In-Work Tax Credit portion of Working for Families, worth at least \$72.50 per week, is paid only to families who have the minimum number of paid work hours and is a policy that discriminates against recipients of welfare benefits, who are disproportionately Māori and Pasifika, and against sole parents, who must have a greater number of weekly hours of paid work per person (20) than a couple (30). CPAG has long advocated for the removal of the discriminative criteria that entrenches poverty. Removing the work-hours criteria is the most swift and cost-effective solution to alleviating poverty among the worst-off families in Aotearoa.
2. CPAG shares agreement with the wider Children's Wellbeing Network of organisations that the focus areas for this desired outcome should include a stronger focus on refugee children and young people, and also LGBTQI+ children and young people.
3. CPAG shares agreement with the wider Children's Wellbeing Network of organisations that the focus areas for this desired outcome should include a stronger focus on bullying prevention.

Desired outcome 8. The cultures of children, young people and their families and whānau are recognised, enhanced and supported.

1. CPAG supports the focus areas of this desired outcome and recommends that the education system should provide the mechanism for celebrating and supporting culture among children as well as learning about other cultures.
2. Aotearoa should be recognised as a bicultural and multi-cultural society in and as such all systems and services should provide delivery that is culturally appropriate.
3. CPAG shares agreement with the wider Children's Wellbeing Network of organisations that the focus areas for this desired outcome should include a stronger Pasifika focus.

Desired outcome 9. Children and young people have improved opportunities for civic engagement and environmental awareness.

1. CPAG supports the focus areas of this desired outcome and recommends that the education system should provide the mechanism for civic engagement through civics education being provided in schools across multiple levels. A focus should be on educating about New Zealand history, including colonisation and Te Tiriti o Waitangi.
2. CPAG shares agreement with the wider Children's Wellbeing Network of organisations (CWN) that children's role in environmental protection and the protection of the environment for children is a separate area of focus. CPAG supports the recommendation by wider CWN that an additional desired outcome could be added: 'Children and young people live in a healthy and sustainable environment,' followed by bullet points including: 'children and young people have opportunities and are supported to engage in environmental protection and promotion'.

Desired outcome 10. Children and young people and their families and whānau are empowered to make healthy lifestyle decisions for children and young people.

1. CPAG supports the focus areas of this desired outcome and recommends the addition of a focus on ensuring that families have income adequacy so that they have all the resources they need to be able to make healthy choices.
2. CPAG shares agreement with the wider Children's Wellbeing Network of organisations (CWN) that there should be a focus on ensuring children and young people's mental and emotional wellbeing. Empowering children and young people to have autonomy over their bodies and healthcare needs requires having increased age-appropriate health care accessible within all schools.
3. A universal nutritious lunch programme provided across schools at all deciles could help facilitate greater social skills among children as well as provide education about a quality nutritious diet. At the same time such a programme would ensure that all children have access to a quality nutritious meal that provides them the energy requirements for learning and for healthy brain development. As well, such programmes have been known to reduce truancy, thereby encouraging students to continue on in their studies. Alongside this CPAG recommends that the healthy food and beverage guidelines for schools be re-instated.⁷

Desired outcome 11. Disabled children and young people have improved opportunities and outcomes.

1. CPAG supports the focus areas of this desired outcome and in particular welcomes the 600 new support staff for schools recently announced by Government. Ensuring that children with disabilities have access to equal opportunities, requires that education be inclusive and resourced sufficiently to ensure that all children's needs are met, and that teachers are trained appropriately to provide for them.
2. CPAG shares agreement with the wider Children's Wellbeing Network of organisations (CWN) that the focus should not be on disabled children and young people merely having "improved opportunities and outcomes"; the focus should be on their right to

⁷ <http://www.foe.org.nz/2009/02/18/national-reversal-on-healthy-food-in-schools-incredible/>

enjoy a full and decent life, and supports suggested re-wording: “Disabled children and young people are assured of equitable opportunities and outcomes.”

3. A further bullet point should be added to ensure that families have income adequacy so that they are able to meet any additional costs needed to support children with disabilities. Often the needs of a child with a disability mean a caregiver cannot undertake paid employment, and therefore the family encounters greater income hardship through loss of a potential income. Sole parents with disabled children are particularly disadvantaged in this regard and the income support currently offered for children with a disability is insufficient, to ensure that needs are met and that quality of living can be achieved and sustained. CPAG supports [greater income support](#)⁸ for families/whānau where there is disability.
4. CPAG recommends that an individualised funding model be investigated to provide, where appropriate, tailored programmes and services, including housing, to disabled children and their families.⁹
5. CPAG recommends that an independent fully-funded Commissioner and advocacy service for disabled persons, children and their parents be established that would work with the sector and help parents to deal with state and other agencies, and provide support and advice for families.⁷

Desired outcome 12. Children’s and young people’s mental wellbeing is supported.

1. CPAG supports the focus areas of this desired outcome, and recommends the adoption of welfare reform recommendations in aid of reducing the impacts of poverty, and health policy recommendations referred to under **Desired outcome 1**.
2. CPAG supports the bullet point relating to families being equipped to provide supportive home environments which promote good mental wellbeing, and suggests that this could be amended to include good mental wellbeing “family-wide”. Poverty can have huge and lasting impacts for children’s mental wellbeing¹⁰, especially when the experience begins from a very young age. The impact of poverty on maternal mental wellbeing is also very high¹¹, and may have serious implications for whether they and their children go on to have quality of life in their later years, including having good education and employment opportunities. Family violence and addiction may be underpinned by mental health issues, that are exacerbated by financial hardship.
3. CPAG recommends that any cost barriers for timely and appropriate care and treatment for mental health problems for all families, especially those living with low incomes, be removed.
4. CPAG also recommends that the public health system, as a mechanism to improve child wellbeing, should prioritise maternal mental health needs for low-income families prior to and after the birth of children.
5. CPAG recommends that universal and adequate health care for children up to the age of 18 yrs (0-17 years) for ALL their health needs – GP visits, prescriptions, oral health, vision and hearing care, and that age-appropriate healthcare is available for children in

⁸ <https://www.cpag.org.nz/news/new-article-on-child-poverty-and-disability/>

⁹ <https://www.cpag.org.nz/assets/150317ChildDisability.pdf>

¹⁰ https://www.cpag.org.nz/assets/170516%20CPAGChildPovertyandMentalHealthreport-CS6_WEB.pdf

¹¹ <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/research/material-hardship-maternal-and-child-outcomes/association-of-material-hardship.html>

all schools. For more information on CPAG's recommendations for children's health see [here](#).¹²

6. Children's cultural needs and connections should be prioritised as a focus area under this desired outcome as well as **Desired outcome 8**.

Desired outcome 13. Children and young people are supported to make positive decisions.

1. CPAG supports the focus areas of this desired outcome and shares agreement with the wider Children's Wellbeing Network of organisations (CWN) that the second bullet point needs to be reframed to be about children and young people understanding their rights and responsibilities and the rights and responsibilities of others.
2. CPAG also shares agreement with the wider CWN's suggestion that a bullet point should be added relating to children's Article 12 of Convention on the Rights of the Child which states that children have the right to participate in decision-making processes that may be relevant in their lives and to influence decisions taken in their regard—within the family, the school or the community.
3. CPAG is concerned that children who offend may enter the adult criminal justice system for minor offences too young, and supports [JustSpeak's call to action that young people should be considered in the youth justice system up till the age of 21](#).¹³

Desired outcome 14. Children experience best development in their “first 1000 days”, safe and positive pregnancy, birth and responsive parenting (conception to around 2).

1. CPAG supports the focus areas of this desired outcome and shares agreement with the wider Children's Wellbeing Network of organisations (CWN) in that the outcome should be reframed to include “up to the age of three”, given the wealth of evidence that exists documenting the crucial and significant development that occurs during those particular years.
2. CPAG recommends that a focus on reducing poverty and improving maternal health supports be prioritised to ensure children are prevented from suffering the associated health risks of poverty experienced in their early years - refer to CPAG recommendations under **Desired outcomes 1 and 12**.

Desired outcome 15. Children are thriving socially, emotionally and developmentally in the early years (around 2 to 6)

1. CPAG supports the focus areas of this desired outcome and recommends that the first bullet point be updated to read “... supported to provide loving, *safe*, stimulating environments for children to develop and learn ...”

¹²

https://www.cpag.org.nz/assets/170512%20CPAG%20Reducing%20the%20health%20risks%20for%20children%20backgrounder_v2.pdf

¹³ <https://www.justspeak.org.nz/ourwork/legislation-bill>

2. CPAG recommends the adoption of welfare reform recommendations, and health policy recommendations referred to under **Desired outcome 1**, as well as education policy recommendations under **Desired outcome 6**.
3. CPAG recommends the adoption of education policy recommendations including more adequate distribution of funding for schools serving low-income communities, and increased per-student operational funding as documented in CPAG's [*A New Zealand where Children can flourish: Priorities for education*](#).¹⁴
4. CPAG also recommends the addition of a focus area: "Children live in safe, secure and stable housing situations" with the aim of minimising any health and education risks associated with frequent moving, and recommends also the adoption of housing recommendations referred to under **Desired outcome 4**.

Desired outcome 16. All children and young people have an equal chance to gain the skills, knowledge and capabilities for success in life, learning and work.

1. CPAG supports the focus areas of this desired outcome and recommends the adoption of recommendations for education referred to under **Desired Outcomes 7, 11, 12, 13, 14 and 15**.

¹⁴ <https://www.cpag.org.nz/assets/170906%20CPAG%20Education%20priorities%202017.pdf>