



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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Human Rights Commission
Te Kāhui Tika Tangata

Submission to Department of Prime Minister and Cabinet on Child and Youth Wellbeing Strategy

December 2018

Submission of the Human Rights Commission to the DPMC regarding the Child and Youth Wellbeing Strategy

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The Human Rights Commission welcomes recent progress towards the improved promotion of children’s rights in Aotearoa New Zealand. This approach aligns with recommendations made by the United Nations Committee on the Rights of the Child.¹

We are aware of DPMC efforts to engage broadly and deeply on this strategy and we commend the direct engagement with children.

This submission acknowledges the significant progress and commitment that New Zealand has made in this area. It discusses some ways the strategy could be developed to provide the best opportunity to support the effective realisation of all rights of all children in this country.

¹ See the comments and recommendations from the Committee on the Rights of the Child in their last review of New Zealand in 2016, at paragraphs 35, 36 and 9:
https://tbinternet.ohchr.org/Treaties/CRC/Shared%20Documents/NZL/INT_CRC_COC_NZL_25459_E.pdf.

Summary of recommendations

Our submission recommends **enhanced links to human rights instruments in development and implementation** by:

- Transparent mapping of the Strategy against New Zealand’s human rights obligations – including under Te Tiriti o Waitangi – to show areas not covered, and to assist with development
- Ongoing engagement with the government International Human Rights Governance Group and the Children’s Convention Monitoring Group
- Ongoing integration with the range of systemic reform taking place, including in justice, mental health, and education

In terms of the **substance** of the Strategy documents, our recommendations include:

- Increased recognition of the particular rights of tamariki and rangatahi Māori, and the fundamental links between whānau and mokopuna well-being
- Enhanced focus on the children whose rights need most active promotion – including disabled children, Pacific children, and intersex and gender diverse children
- Inclusion of climate action, recognising environment as a pre-condition to realisation of other rights of children

In terms of the **framing** of the Strategy we recommend:

- Particular care in referring to the parent and whānau wellbeing that supports foetal development
- A vision statement that goes beyond an international comparison

We look forward to further engagement as the Strategy develops and is implemented and monitored.

1. Enhancing links to rights instruments

The Strategy has been informed by the recommendations of the Committee on the Rights of the Child and by the provisions of the UN Convention on the Rights of the Child (the Children’s Convention).

We suggest that links with the UN Convention on the Rights of the Child (the Children’s Convention), and especially the recommendations of the Committee on the Rights of the Child, should be made more transparent, giving the connections greater visibility. This would enhance the ways in which the Strategy can cover further aspects of New Zealand’s international commitments and help form a full children’s rights action plan.

Similarly, if other human rights instruments have informed the Strategy development work these links and connections should also be referenced.

Transparent linking of all children’s rights obligations (arising under a range of rights instruments)² would be valuable and would assist in identifying areas where later iterations of the Strategy can develop to better promote all rights of children.

² International Covenant on Civil and Political Rights (ICCPR), International Covenant on Economic, Social and Cultural Rights (ICESCR), Convention Against Torture (CAT), Convention relating to the Status of Refugees,

This linking would also improve the functioning of the Strategy as New Zealand moves from a rights reporting focus towards a rights implementation focus.

1.1. Children’s Convention

We welcome the Proposed Outcomes Framework’s reference to the Children’s Convention.³

The Children’s Convention Monitoring Group has met with DPMC and discussed some of the ways to enhance the Strategy’s functioning as a comprehensive plan for children’s rights. Suggestions included:

- Use the Ministry of Social Development Child Impact Assessment tool for analysis of the Strategy against the Children’s Convention
- Educate policy makers across government about Children’s rights⁴
- Involve the Children’s Convention Monitoring Group in monitoring and development of the Strategy on an ongoing basis.

1.2. Te Tiriti o Waitangi

We also welcome the reference to the Treaty of Waitangi (in draft principle 4). We understand that this reflects the message given in many consultation meetings that a wellbeing strategy needs to be clearly grounded in Te Tiriti o Waitangi. We endorse this approach and encourage the integration of Te Tiriti throughout the Strategy. The Tiriti o Waitangi Māori-Crown partnership should be reflected in the presentation and the framing of the Strategy, as well as in the processes followed in developing and implementing the Strategy.

We are particularly keen to see the Strategy recognising and providing for collective rights of Māori children and whānau, acknowledging that their wellbeing is linked to the wellbeing of the wider whānau. As outlined further below, the UN Declaration on the Rights of Indigenous Peoples (the Indigenous Peoples’ Declaration) elaborates on the human rights standards to be applied to give practical effect to the promises of Te Tiriti.

1.3. Sustainable Development Goals

New Zealand’s participation in the 2019 voluntary national review of the UN’s High Level Political Forum on Sustainable Development will provide an opportunity to explore the integration of the Strategy with Sustainable Development Goals (SDGs).

Mapping of the draft outcomes framework against the SDGs could be expected and would illustrate potential focus areas for the Strategy.

1.4. Referencing other instruments: Indigenous Peoples’ Declaration, and Disability, Women’s, and Racial Discrimination Conventions

There are other key UN documents that provide guidance about children’s rights and how to implement them which we would expect to be referenced. These include: the Indigenous Peoples’ Declaration, the Convention on the Rights of Persons with Disabilities (the Disability Convention), the

Declaration on the Rights of Indigenous Peoples (the Indigenous Peoples’ Declaration), Convention on the Rights of Persons with Disabilities (the Disability Convention), Convention on the Elimination of all forms of Discrimination Against Women (Women’s Convention/CEDAW), and the International Convention on the Elimination of All Forms of Racial Discrimination (Racial Discrimination Convention/CERD)

³ In draft principle 6.

⁴ A key Children’s Convention obligation (under Article 42).

Convention on the Elimination of all forms of Discrimination Against Women (Women's Convention/CEDAW), and the International Convention on the Elimination of All Forms of Racial Discrimination (Racial Discrimination Convention/CERD).

Each of these Declarations and Conventions set out the rights of specific cohorts of children and explain how rights apply to them. For example, the obligation in the Racial Discrimination Convention/CERD for States to legislate against inciting racial discrimination,⁵ and the Disability Convention description of supported decision-making rights.⁶

With the Strategy set to guide policy development across government, putting children's wellbeing at the centre of policy development and budget prioritisation, it is important that the full range of New Zealand's rights commitments to children are considered.

Mapping the proposed outcomes framework across the Children's Convention illustrates areas where the Strategy could be enhanced. Similar exercises for the Disability Convention and the Indigenous Peoples' Declaration would likely be equally informative. If shared publicly this could inform understanding of the Strategy and of possible future areas for development.

The Strategy could also be compared with recent United Nations body recommendations and concluding observations relevant to children. Many of these recommendations are gathered on the Human Rights Commission's National Plan of Action website, tagged as relevant to children.⁷

These recommendations show the areas of focus for children's rights in New Zealand, from the point of view of a range of expert UN bodies. For example:

- The Committee on Civil and Political Rights has recommended awareness-raising programmes in schools, in relation to sexual assault and consent.⁸
- The Committee on the Elimination of Racial Discrimination has recommended New Zealand reduce the number of Māori and Pacific children in State care.⁹
- The Committee on the Rights of the Child has recommended New Zealand take affirmative action for children in vulnerable situations, children belonging to ethnic minorities, refugee children, migrant children, children with disabilities, lesbian, bisexual, gay, transgender and intersex children, and children living with persons from these group.¹⁰

The Human Rights Commission would be happy to meet with DPMC to discuss the National Plan of Action monitoring tool and the relationship between the Human Rights Commission and the International Human Rights Governance Group.

2. Operationalising the Strategy

As discussed between DPMC staff and the Children's Convention Monitoring Group, Children's Convention materials can provide useful guidance on operationalising the Strategy.

DPMC is likely aware of many of the Children's Convention materials which could support this work, including the General Measures of Implementation (described in the Office of the Children's

⁵ Article 4: <https://www.ohchr.org/en/professionalinterest/pages/cerd.aspx>.

⁶ See section below on disabled children, referencing Article 12 of the Convention of the Rights of Persons with Disabilities

⁷ See <https://npa.hrc.co.nz/category/41>.

⁸ <https://npa.hrc.co.nz/recommendations/407>.

⁹ <https://npa.hrc.co.nz/recommendations/449>.

¹⁰ <https://npa.hrc.co.nz/recommendations/179>.

Commissioner's 2018 *Getting it Right: Building Blocks* report¹¹ and the one page summary of that report¹²), and General Comment 19 (2016) from the Committee on the Rights of the Child, on "public budgeting for the realization of children's rights (art. 4)".¹³

The Human Rights Commission looks forward to ongoing engagement in the operational aspects of the Strategy, including mechanisms for training, monitoring and evaluation.

We support enhanced integration of the Strategy with other work already taking place across government. There are a number of reviews occurring simultaneously in areas such as health, whānau ora, social investment, welfare, tax, criminal justice and education. There is also the mental health inquiry and the historic abuse Royal Commission. These activities, and their outcomes, need to be integrated and well linked with child wellbeing.

3. Enhanced focus on the children whose rights need specific promoting

The outcomes framework largely sets out outcomes that are intended to apply to all New Zealand children. Universality is a strength of the children's rights approach.

We suggest that the goal of substantive equality in enjoyment of childhood and children's rights also requires positive and targeted action for particular groups of children.

The Strategy should also recognise the particular status of indigenous children and the particular ways their rights need to be promoted.

We suggest that substantive equality should be promoted through the Strategy by specifically naming and supporting groups of children whose rights and wellbeing need to be actively promoted. This includes refugee-background and asylum seeker children, disabled children, and LGBTQI+ children and young people.

The next sections of this submission address some of the wellbeing factors for disabled children, gender diverse and intersex children, Pacific children and tamariki and rangatahi Māori.

3.1. Disabled children and young people

Members of the Human Rights Commission disability rights team were pleased to have an opportunity to meet with those working on developing the Strategy. Not all matters mentioned at that meeting are repeated in this submission, but a number of the key points are repeated.

The Human Rights Commission is part of the Independent Monitoring Mechanism (IMM) monitoring New Zealand's implementation of the Disability Convention.¹⁴ New Zealand will have its next Disability Convention examination in Geneva in 2019. Good inclusion in the Strategy of Disability Convention rights relevant to children would be positive progress to report at the examination.

In the current draft proposed focus areas, we suggest that proposed focus area 11 should provide higher aspirations for the wellbeing of disabled children. The proposed focus area currently reads, "*Disabled children and young people have improved opportunities and outcomes.*" We suggest that improvement is inadequate, and that the goal should be re-worded to seek outcomes for disabled children that are as good as outcomes for non-disabled children. The Strategy will need to account for

¹¹ <http://www.occ.org.nz/publications/reports/getting-it-right-building-blocks/>

¹² <http://www.occ.org.nz/assets/Uploads/A3-Recommendations-Pull-Out.pdf>

¹³

https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGC%2F19&Lang=en

¹⁴ With the Office of the Ombudsman and a Coalition of six disabled persons organisations (DPO Coalition).

the significant measures necessary to achieve equitable outcomes, given the currently poor outcomes for disabled children.

In measuring outcomes for disabled children and young people, it will be important that indicators of wellbeing reflect the broad definition of wellbeing, and do not position variance from an average as signalling inherently poor wellbeing. The current poor outcomes notwithstanding, disabled children and whānau can and should enjoy good wellbeing.

The Strategy should reflect, in accordance with the Disability Convention,¹⁵ the right of children with disabilities “to express their views freely on all matters affecting them,” and have their views “given due weight in accordance with their age and maturity, on an equal basis with other children, and to be provided with disability and age-appropriate assistance to realize that right”.

As we have submitted to Ministry of Education consultation processes, inclusive education is good for all students.¹⁶ We would also support the addition of inclusivity of education to the Strategy and suggest this could fit under current draft focus area 7 or 16 (freedom from discrimination or access to education).¹⁷

3.2. Gender diverse and intersex youth

We suggest that there should be explicit recognition in the Strategy of the needs of gender diverse and intersex children and young people as a group of children whose rights need targeted promotion.¹⁸

Gender diverse and intersex children should be specifically recognised in proposed focus area 7 (regarding freedom from discrimination). Discrimination is the factor repeatedly identified as creating poor mental health experiences and high suicide rates for these children.¹⁹ This is compounded by the difficulty these young people have accessing appropriate help when they need it.²⁰

The example of gender diverse children also shows the range of rights – in addition to Children’s Convention rights – relevant to children. While the Children’s Convention recognises a right to identity,²¹ the right of gender diverse children to recognition before the law is largely established in the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights.²²

Similarly, while the Committee on the Rights of the Child has made recommendations about intersex children’s rights in New Zealand,²³ other significant recent statements on the matter come from the

¹⁵ [Articles 3\(8\) and 7\(3\)](#).

¹⁶ See [“Paula Tesoriero: Inclusive education produces better outcomes for all”](#).

¹⁷ See the IMM’s 2016 report [“Article 24: The Right to an Inclusive Education Interim Implementation Report”](#).

¹⁸ See [Ara Taiohi Snapshot 2015: A Report on the Support Sector for Rainbow Young People](#).

¹⁹ See for example the [American Academy of Pediatrics Policy Statement: Ensuring Comprehensive Care and Support for Transgender and Gender-Diverse Children and Adolescents](#): Volume 142, number 4, October 2018. We note also the current anti-rights discourse seeking to limit rights of trans, gender diverse, and intersex people. This discourse emphasises the need for clear guidance about the right to equality and non-discrimination.

²⁰ See this [Youth ‘12 fact sheet published by the University of Auckland](#) for figures reflecting high risk of suicide, self-harm, and being unable to access healthcare when needed.

See also [He Ara Oranga, the Report of the Government Inquiry into Mental Health and Addiction](#).

²¹ Children’s Convention article 8.

²² See [ICCPR Article 16](#): and [Yogyakarta Principle 3](#). The UN Independent Expert on Sexual Orientation and Gender Identity, in his [recent report to the UN General Assembly](#) (at 81(a)), urged States to: “Enact recognition systems for the gender identity of trans and gender-diverse children, taking into account the best interests of the child as a primary consideration and respect for the child’s right to express views in accordance with age and maturity, in line with the Convention on the Rights of the Child [...]”.

²³ Recommendations 25(b)-(e) of the [2016 Concluding Observations](#).

Special Rapporteur on Torture, who has commented on non-consensual and medically unnecessary surgeries performed on intersex infants. The Special Rapporteur on Torture has described these surgeries as ill-treatment and torture, violating the rights to bodily autonomy and self-determination.²⁴

This illustrates the establishment of children's rights in a range of international human rights instruments, and the benefit of looking broadly at human rights recommendations to inform the Strategy. Similarly, the Women's Convention can inform analysis of human rights priorities for girls and young women. The Indigenous Peoples' Declaration can inform the promotion of the rights of Māori children, and the Committee on the Elimination of Racial Discrimination has made a range of recommendations which, if implemented, would improve the lives of many children.

More broadly, in terms of priorities for inclusion in the Strategy, the human rights concerns and wellbeing of intersex children are addressed by the Intersex Trust of Aotearoa New Zealand in their fact sheet prepared for New Zealand's current Universal Period Review.²⁵ The Human Rights Commission would hope to see these concerns addressed in the Strategy.

The Human Rights Commission's Advisor on Sexual Orientation, Gender Identity and Sex Characteristics would be happy to meet to discuss the priorities of gender diverse young people. Many of these priorities are shared with other young people. For example, inclusive education is a need for all children, including gender diverse and disabled children.

3.3. Pacific children and young people

Many of the desired outcomes and proposed focus areas are particularly relevant to young Pacific people.

The desired outcome of additional support for young people not in education, training or employment is one outcome relevant to Pacific people which the Commission did not see carrying through to a proposed focus area. There is current government action in this area which could be recognised and enhanced in a more comprehensive strategy for the promotion of children and young people's rights.²⁶

The Human Rights Commission is soon to release a paper on human rights issues for Pacific people in New Zealand.

That upcoming paper addresses a range of concerns for children, including education, which is both a human right in itself and a vital means of realising other human rights, essential for the development of human potential, enjoyment of the full range of human rights and respect for the rights of others. The right to education encompasses the obligation to avoid discrimination at all levels of the education system, to set minimum standards and to improve the quality of education.²⁷ We often hear from young Pacific people that they experience discrimination in the form of low expectations from their teachers. We would hope to see that concern addressed under proposed focus area 7, regarding discrimination.

²⁴ https://www.ohchr.org/Documents/HRBodies/HRCouncil/RegularSession/Session22/A.HRC.22.53_English.pdf, as introduced and summarised [here](#) by Intersex Human Rights Australia.

²⁵ Downloads [here](#). This fact sheet reflects a position set out in the [Darlington Statement](#) from Australia and New Zealand intersex community representatives in March 2017.

²⁶ For example [Māori and Pasifika Trades Training](#).

²⁷ The right to education is set out in a number of international treaties, the most significant of which are the International Covenant on Economic, Social and Cultural Rights (Articles 13 and 14) and the Convention on the Rights of the Child (Articles 28 and 29).

The cost of tertiary degree level study limits the opportunity of Pacific people to earn higher incomes and to use education as a tool to break intergenerational cycles of impoverishment and hardship. The “fees free” initiative has been a welcome initiative to enable Pacific people to continue study.

The upcoming paper also discusses the intersection of human rights concerns experienced by many Pacific people, including Pacific Rainbow / LGBTQI+ people, disabled Pacific people, and Pacific women.

Our specialist Pacific human rights adviser would be pleased to meet and share this paper when it is available or to provide an advance copy for discussion.

3.4. Tamariki and rangatahi Māori

As mentioned in relation to te Tiriti o Waitangi and the UN Indigenous Peoples’ Declaration, we are particularly keen to see the Māori-Crown partnership and indigenous rights woven more strongly throughout the Strategy.

The commitment to the Crown-Māori relationship, while acknowledged as one of the six principles underpinning the development of the Strategy, is not currently inherent in the framing and language of the draft outcomes framework and focus areas. Indigenous rights to full participation, to language and culture seem diluted amongst more generic foci of cultural pride and addressing racism.

We understand that DPMC has engaged with whānau and rangatahi Māori throughout Aotearoa and we look forward to learning more about this input and seeing the resultant enhancements to the Strategy.

Māori children have particular needs and particular status as indigenous children, and it is important that the Strategy resonates for Māori communities.

As recognised in the Māori Affairs Select Committee 2013 Inquiry into the determinants of wellbeing for Maori children, “the wellbeing of tamariki Māori is inextricable from the wellbeing of their whānau”.²⁸

We suggest that there should be specific recognition of a “desired outcome” and “proposed focus area” that “Tamariki and rangatahi Māori are able to live as Māori in te ao Māori”.²⁹

4. Other content suggestions

4.1. Climate action as a focus area

As a long-term strategy for cross-government promotion of children’s rights, the Strategy needs to explicitly include climate change response and mitigation. This is a responsibility of government to create the necessary pre-conditions for the promotion of many other rights of children.

The Human Rights Commission views climate rights recognition as particularly important given New Zealand’s role in the Pacific and the likely resulting migration flow of Pacific people, including children, to New Zealand.

New Zealand is committed to the UN Sustainable Development Goals (including goal 13: climate action, goal 11: sustainable cities and communities, and goal 12: responsible consumption and production).³⁰

²⁸ [Page 13](#), “The mana of whānau”. We refer to SUPERU’s Whānau Rangatiratanga framework as an example of a detailed working out of whānau wellbeing factors.

²⁹ A right protected by the Tiriti o Waitangi and by the Indigenous Peoples’ Declaration.

³⁰ <https://sustainabledevelopment.un.org/sdgs>

However, a recent stocktake report of government policy by the Climate Change Adaptation Technical Working Group, administered by the Ministry for the Environment, noted that New Zealand lacks an overarching strategy or plan for adapting to climate change and has not undertaken a nationwide assessment of climate related risks. That Working Group has also identified climate change as posing significant risks for public health.³¹ This makes the absence of climate change action in the draft outcomes framework a serious concern.

4.2. Children’s rights in employment

Employment rights and safety for children in work remain a concern, given children’s vulnerability as recent entrants to the workplace, typically with limited bargaining power and dealing with employers with much more experience in the workplace.

Under proposed focus area 2 (physical safety in daily activities), we suggest that the safety of young people at work is specifically mentioned, particularly given the reservation to the Children’s Convention that New Zealand still holds, in relation to the age at which children can enter employment.

We also suggest that the “desired outcome” in the “have what they need” wellbeing domain that relates to “quality employment” should explicitly encapsulate an outcome of children having employment rights that are equal to those of adults and are respected and enforced.

5. Framing the Strategy

5.1. Pregnancy and the first 1000 days

We appreciate the intention of the references to positive development in pregnancy.³² However, we suggest careful framing of these aspects of the Strategy to ensure that the Strategy does not conflict with current legal and social understandings about the rights and autonomy of pregnant people³³ and more appropriately focuses on the wellbeing of parents, families and whānau during this period.

For example, we suggest that the desired outcome that “*Children have positive development starting before birth, including through the wellbeing of mothers, families and whānau*” might be reworded along the lines of “*The wellbeing of parents, families and whānau supports positive development.*”

We suggest that the related proposed focus area 14 be reworded from “*Children experience best development in their “first 1000 days”, safe and positive pregnancy, birth and responsive parenting (conception to around 2)*” New wording might be along these lines: “*Parents, whānau and families have the support they need for safe and positive pregnancy and birth, and children experience best development from 0-3 years*”.

We also suggest consideration of submissions and supporting literature calling for recognition of the importance of the first three years of a child’s life, rather than the first two.³⁴

³¹ <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/adapting-to-climate-change-stocktake-tag-report.pdf>

³² First desired outcome under “learning and developing” well-being domain, and proposed focus area 14

³³ See paragraphs 3.29-3.36 of the Law Commission’s recent [Ministerial Briefing on Alternative approaches to abortion law](#); and the recent [UN Committee on Civil and Political Rights General comment No. 36 \(2018\) on article 6 of the International Covenant on Civil and Political Rights, on the right to life](#) referred to by the Law Commission.

³⁴ We refer to the Save the Children’s submission to this process, and the literature referred to there about the development that occurs between ages 2 and 3.

5.2. Vision statement

We anticipate that the current consultation will produce a range of suggestions for enhancements to the vision statement. The current draft vision statement – *New Zealand is the best place in the world for children* – is clear and may well remain a strong slogan associated with the Strategy. However, when reviewing these suggestions, we recommend considering a vision statement that is absolute rather than comparative – or an absolute statement in conjunction with the current comparative statement. New Zealand should aspire to *lead* the world in improving childhoods for children everywhere, rather than simply seeking to be the best.

The vision statement should also be inclusive and equitable, emphasising the desire for every child to thrive.

6. Child Poverty Action Group submission

We have had the opportunity of reading the Child Poverty Action Group submission. We consider that it usefully contextualises child wellbeing. We suggest that its recommendations relating to the broader societal context of child and youth wellbeing should be given particular weight.

7. Ongoing engagement

Again, the Human Rights Commission welcomes the significant progress and commitment that this Strategy represents.

We look forward to engaging in ongoing development and implementation of the Strategy.

Particularly, we look forward to opportunities for our incoming Commissioners to engage in the new year and to support the development of a rights-based approach to the wellbeing of children and their families and whānau.