



## 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.
- Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it.

#### Key to redaction codes and their reference to sections of the Act:

- **9(2)a** – Section 9(2)(a): to protect the privacy of natural persons, including deceased people.

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## Child and Youth Wellbeing Strategy – Submission Template

This document is intended for individuals or groups who wish to make a formal submission on the child and youth wellbeing strategy.

Please complete this template and email it to: [childandyouthwellbeing@dpmc.govt.nz](mailto:childandyouthwellbeing@dpmc.govt.nz)

A guide to making a submission is available on the DPMC website <https://dpmc.govt.nz/our-programmes/child-and-youth-wellbeing-strategy>

Submissions will close on **Wednesday 5 December**.

**Please provide details for a contact person in case we have some follow up questions.**

<b>Contact Name:</b>	9(2)□(a)
<b>Email Address:</b>	
<b>Phone Number:</b>	
<b>Organisation Name:</b>	[Please include if you are submitting on behalf of an organisation]
<b>Organisation description:</b> (tell us about your organisation – i.e. who do you represent? How many members do you have? Are you a local or national organisation?)	
<b>Executive Summary:</b> (Please provide a short summary of the key points of your Submission - 200 words)	<p>The current outcomes framework does not reflect the transformational change that is needed for children and that has been called for by the Prime Minister. Key recommendations:</p> <ol style="list-style-type: none"> <li>1. Work collaboratively with Māori and others to incorporate shared concepts and values that are based on te Ao Māori.</li> <li>2. Embed a deeper consideration of UNCRC principles and substantive action areas, and embed a system of good governance for children ( “general measures of implementation”).</li> <li>3. Ensure that for each domain there is multi-level action so the focus is not only at the individual level. Thriving children and whānau are at the centre, they are connected to what is important to them, surrounded by supportive communities and service systems, which are in turn supported by a positive and responsible policy and regulatory context.</li> <li>4. Specific actions are evidence-based or logic-based (and evaluated) and accompanied by specific and timely funding and implementation arrangements (avoiding the strategy</li> </ol>

	<p>sitting on a shelf like the 2002 Agenda for Children).</p> <ol style="list-style-type: none"><li>5. Cost-effective public health interventions that have a major impact on children are prioritised including addressing alcohol and junk food marketing, sponsorship and availability.</li><li>6. Children, youth and carers get the support they need when they need it.</li></ol>
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## Submission Content

There is much to commend in the broad direction of the Child and Youth Wellbeing Strategy (CYWS), including the legislative requirements relating to child poverty reduction and the need for governments to have a strategy. I support the vision, broad approach, and priorities outlined in the cabinet paper. This is a brief submission to highlight some of the key gaps as I see them so far and is not comprehensive.

***The framing and content of the outcomes framework does not reflect the transformational change that is needed and that has been called for by the Prime Minister.***

The outcomes framework covers most of the important domains but it presents as a workplan for government rather than a strategy for wider change and hence is inherently limiting. The strategy should guide government, but should also guide all other organisations, communities and whānau themselves. The strategy also appears to continue to focus attention at an individual-level, which has been NZ's longstanding approach, and has limited the range of actions and approaches to child wellbeing.

Māori co-design and the core concepts and values of te Ao Māori do not appear embedded in the strategy in a meaningful way. That risks perpetuating inequities, hindering the wider adoption and sustainability of the strategy, and limits its effectiveness.

Some examples of concepts and values that could be included are:

- Whanaketanga
- Tūrangawaewae
- Kaitiakitanga
- Manaakitanga
- Rangatiratanga
- Te Ao Tūroa
- Aroha ki te tangata
- Mana enhancing.

Similarly, New Zealand has only ever had a superficial approach to the UN Convention on the Rights of the Child (UNCRC) and that is reflected in the outcomes framework. While listing UNCRC as a principle is a start, it is a missed opportunity for the transformational change that is needed. UNCRC helps governments ensure that children are treated with respect as human beings. Prioritising the best interests of children in any area of policy or service delivery, and listening to their views, would be challenging but transformational if done properly. We all need to be challenged to think deeply about what UNCRC means in practice. UNCRC covers the existing priorities of the strategy but adds a depth that is more likely to sustain long-term change. The substantive articles of UNCRC cover all the important aspects of children's lives and deserve serious attention. Considering the UNCRC principles might entail the following actions, for example:

### **Protection**

New Zealand already has recommendations relating to alcohol from the Law Commission and the Ministerial Inquiry on Alcohol Sponsorship. The CYWS should think broadly and include protecting children from alcohol-related harm (especially from second-hand exposure and the impact on families and parenting capacity). That would include reducing the availability of alcohol, restricting marketing and sponsorship, increasing the

price etc. The same can be said for junk food and beverages (with recommendations from the World Health Organisation). There are promising indications that smoke-free cars legislation is on the agenda. There are many other examples and there will need to be an adequate response to emerging threats (for example, the online environment).

### ***Provision***

A major shift is needed in every sector and agency to ensure that serious consideration is given to the provisions that children need to thrive. Other high-income countries recognise that childhood is an important period in life, and that parenting can be stressful and needs additional resourcing, especially when there are additional challenges. Child poverty rightly needs to be eliminated and children and their whānau better supported by having adequate incomes (proportionate universalism as you have identified). Prioritising poverty reduction is important but extending universal provisions needs to continue so that NZ has a universal child benefit (or one that only excludes the most affluent). Children with disabilities and in Oranga Tamariki care need more financial support e.g. child disability allowance needs to better reflect the cost of living and of providing care. All children with learning, behavioural or developmental problems, and all parents who need support for matters that impact on parenting (including practical and emotional, or specialist support), should be able to receive timely support services without the barriers, hassles and restrictions that exist currently. Housing and school lunch provisions are other examples and there are many others.

### ***Participation***

Radical change is needed across all agencies at every level - this strategy should have a strong focus on embedding a culture of adults respecting and making the effort to understand the experience and views of the children that they or their agencies serve.

### ***Embedding a system of good governance for children***

UNCRC gives detail about what a good system of governance would entail. A strategy is a good start but the strategy says little about progressing and embedding a good system of governance for children to avoid slipping back to a situation in which so many children have been left behind. It would also help to make sure that governments know what children think should be the priorities for action. Climate change is likely to feature prominently, but it would be helpful to have a system of engaging with children to inform future work.

### ***Recommendations***

1. There is a major revision of the outcomes framework that involves working collaboratively with Māori and others to incorporate shared concepts and values that are based on te Ao Māori.
2. There is a major revision of the outcomes framework that embeds a deeper consideration of UNCRC principles and substantive action areas, including the “general measures of implementation” such as:
  - reviewing all legislation so it is up-to-date in relation to UNCRC
  - having a permanent central government children’s unit to coordinate children’s policy and implementation
  - implementing child impact assessment
  - having systematic training of staff in relation to their child rights obligations and in how to engage with children in a developmentally appropriate manner
  - educating children about their rights e.g. in health care settings, schools etc.
  - Having a system of monitoring and accountability.

3. There is a major revision of the outcomes framework to ensure that for each domain there is multi-level action so the focus is not only at the individual level. While thriving children and whānau are at the centre, they are connected to what is important to them, surrounded by supportive communities and service systems, which are in turn supported by a positive and responsible policy and regulatory context.
4. Specific actions are evidence-based or logic-based (and evaluated) and accompanied by specific funding and implementation arrangements (including consideration of how to avoid the strategy sitting on a shelf like the 2002 Agenda for Children).
5. Cost-effective public health interventions that have a major impact on children are prioritised e.g. addressing alcohol and junk food marketing, sponsorship and availability.
6. Children, young people and carers get the support they need when they need it.

Please note that your submission will become official information. This means that the Department of the Prime Minister and Cabinet may be required to release all or part of the information contained in your submission in response to a request under the Official Information Act 1982.

The Department of the Prime Minister and Cabinet may withhold all or parts of your submission if it is necessary to protect your privacy or if it has been supplied subject to an obligation of confidence.

Please tell us if you don't want all or specific parts of your submission released, and the reasons why. Your views will be taken into account in deciding whether to withhold or release any information requested under the Official Information Act and in deciding if, and how, to refer to your submission in any possible subsequent paper prepared by the Department.