

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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Submission to the Child Wellbeing Strategy

The Salvation Army New Zealand, Fiji and Tonga Territory, with Samoa

OUR BACKGROUND & INTERESTS

- 1. The Salvation Army is an international Christian and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Army provides a wide-range of practical social, community and faith-based services, particularly for those who are facing injustice or those who have been forgotten and marginalised by mainstream society.
- 2. As a Christian and social services organisation The Salvation Army has had a long standing interest in the well-being of the poorest and most vulnerable New Zealanders and that of children especially. As a social services provider the Army has quite limited involvement in the provision of services directly to children. Such provision includes the operation of some early childhood education facilities, community based social work with families and youth work with at risk teenagers in some low-income neighbourhoods.
- **3.** This submission has been prepared by the Social Policy and Parliamentary Unit of The Salvation Army. This Unit works towards the eradication of poverty by encouraging policies and practices that address issues of social justice and help strengthen the social framework of New Zealand. This submission has been approved by Commissioner Andrew Westrupp, Territorial Commander of The Salvation Army's New Zealand Fiji Tonga and Samoa Territory.

THE SALVATION ARMY'S OVERALL PERSPECTIVE ON THE STRATEGY

- 4. The Salvation Army is entirely supportive of the Government's efforts in eliminating child poverty and in ensuring that all New Zealand children are able to share their birth-right of growing up safe and well and of reaching their full potential. It is the Army's view that the rise of inequality in the 1990's and the persistence of the resulting poverty and deprivation since then have marred more than a generation of children. These in turn have embedded income poverty, material hardship and homelessness into our society and social structures. Poverty statistics show that children, and particularly Maori children have been worst impacted by these changes. The time for a structural shift in public policy to address these outcomes is in our opinion past due and both the Child Poverty Reduction Bill and the Child Wellbeing Strategy are essential parts of this shift.
- 5. The Army however has a broad concern with the tangibility of these commitments by Government although we accept without reservation the authenticity of them for improving the lot of our poorest and most at risk children. This concern over tangibility is at least fourfold:
 - The strategy lacks specifics and while its focus is clear it does not offer any indication of possible priorities for children in general and for groups of children in particular.

- The strategy ignores the role which economic inequality and racism have played in creating and perpetuating poverty. It also overlooks the way in which poverty has diminished the lives of tens of thousands of New Zealand children.
- Its focus on broad principles rather than rights more easily avoids accountability.
- The strategy's general interest in nurturing rather than protecting ignores the real harm being done to many children.
- 6. It might be argued that strategies by their nature are broad and general, designed to offer an indication of overall direction and to espouse the values which are behind our subsequent efforts. While this may be true, the political currency of such gestures may be limited given their over-use and their failure in the past to mark any significant change in direction or shift in priorities. The rhetoric of strategies and the reality of public policy practice are often so separate that strategies are ignored by the public as being fanciful and somewhat irrelevant.
- 7. The Salvation Army believes that such a response to the Child Wellbeing Strategy is not inevitable although it is certainly possible. We feel that the Strategy can be saved from such a fate if it was more directed, specific and offered tangible proposals for changed priorities. The suggestions below may be of some value in such a re-framing.

FEW INDICATIONS OF PRIORITIES

- 8. The Children's Commissioner Judge Beecroft frequently makes the point that 70% of New Zealand children flourish, 20% struggle because of the circumstances of their families/whanau and 10% do very badly on most wellbeing indicators. Child poverty data such as that provided by Ministry of Social Development ¹ supports this analysis and provides insights into the extent and prevalence of some children's poverty and material hardship. Ideally, in any antipoverty strategy the circumstances and causes of the poverty of this most at risk group should be paramount.
- 9. The Child Wellbeing Strategy is of course not an anti-poverty strategy. However it does sit beside the Child Poverty Reduction Bill and its ambitions to address levels of child poverty. This focus is somewhat lost in the Strategy with its broad focus on the circumstances of every New Zealand child's wellbeing. With this focus the Strategy lacks a sense of overall priority and as a document which might be expected to direct attention and effort it may be seen as somewhat lacking.
- 10. To be fair the strategy does offer some priorities the most notable are those of children living in poverty (focus area 5), those living in disadvantage (focus area 6) and children and young people with disabilities (focus area 11). These priorities are laudable as are sentiments offered elsewhere in the Strategy to provide support for 'children and young people with emerging mental health needs' and being concerned that 'families and whanau can access and afford housing'. The problem here is, that with such a broad range of priorities alongside a more general concern for the wellbeing of every child and young person, the Strategy lacks a sense of what is most important. As a result it risks becoming all things to all people and so nothing in particular to anyone.

- 11. The Salvation Army believes that the Child Wellbeing Strategy could be more emphatic than it is and that by being so become more definitive about which challenges are seen as most important. Such improved definition could in turn make the Strategy more aspirational and perhaps more inspirational. To this end we offer two suggestions to focus explicitly on inequality and to be far more direct about the structural disadvantage suffered by Maori children.
- 12. The Salvation Army is supports the ideas offered in focus area 7 that 'Children and young people are free from racism, discrimination and stigma'. In particular the Army supports this reference to racism and the implication here that racism diminishes the wellbeing of many New Zealanders including our children. The Salvation Army agrees with this implication and believes that the association of racism, and prejudice more broadly, with inequality and so with poverty needs to be acknowledged more explicitly in the Strategy. This is especially so with racism still directed at Maori and especially with the systemic racism we continue to see in our appalling statistics around health and education inequalities and our youth suicide and incarceration rates.
- **13.** On a more positive note The Salvation Army supports the idea offered in proposed focus area 8 that children's cultural capital should be honoured and supported more by public policy. We are particularly enthusiastic about the idea that te Ao Maora and te Reo Maori are actively promoted and suggest that more emphasis still should be given this promotion in the Strategy. Such emphasis could even extend to ensuring every Maori child has the opportunity to become proficient in te Reo Maori and that it becomes a national goal to teach te Reo in every primary school in the country. The mana of te Reo and of those who speak it will be enhanced by such an ambition we believe.

NO MENTION OF INEQUALITY

14. The Child Wellbeing Strategy does not appear to make any mention of inequality. It instead talks about 'improved equity of outcomes' and 'equal chances' without considering the source and nature of these inequities and missed chances. We acknowledge recent attempts by Government to make access to its services easier and fairer. The need for such an emphasis is reflected in the desired outcomes proposed for the Strategy. However without a more upfront acknowledgement of inequality in our society, it seems unlikely that we will create the moral imperative for our public policies and programmes to be more inclusive and equity focused. Such an acknowledgement does not need to be exhaustive or diagnostic but does need to be included in the narrative around child wellbeing and child poverty so that those with advantage can begin to appreciate their position and relative privilege. Such acknowledgment and appreciation can create space for people to understand the need for change and some sacrifice.

A FOCUS ON RIGHTS AS WELL AS PRINCIPLES

15. Principle 6 of the Strategy acknowledges that rights set out in the United Nations Convention on the Rights of the Child (UNCROC) have been ratified and the these rights form one of the Strategy's principles. The Salvation Army believes that this somewhat incidental reference to

rights diminishes their importance and overlooks their valuable role in providing a moral basis for the Strategy. We believe that the Strategy should have more regard both to UNCROC and the International Covenant on Economic, Social and Cultural Rights (ICESR).

- **16.** We believe that a rights based approach to social policy is both appropriate and necessary if we are to more effectively re-frame the political discourse. Such re-framing is necessary in order to negate the dominance in our current political discourse of property rights and narrowly defined civil and political rights.
- **17.** If a decision is made to extend the references to rights within the final Strategy we suggest the following areas of focus be included:
 - that decisions including those around public policy and budget allocations are made in the best interests of children (Article 3 UNCROC);
 - that opportunities to increase spending on child focused programmes and especially those which relieve child poverty are maximised and not tacitly traded off against other political priorities without acknowledgement of their consequences for children (Article 4 UNCROC);
 - that children not be discriminated against on the basis of their parentage or the behaviours or status of their parents (Article 10 ICESR);
 - that the State's obligation to offer material support to children's parents or guardians in their raising of children be recognised in welfare law (Article 18 UNCROC);
 - that children alongside their families/whanau have a right to an adequate standard of living and to expect improving living conditions over time (Article 11 ICESR).

PROTECTING AS WELL AS NURTURING

- **18.** The Salvation Army agrees wholeheartedly with the idea offered in Principle 7 of the Strategythat we have a collective responsibility for all New Zealand children. We suggest however that the idea that we have a responsibility 'to nurture the children and young people in our communities' is arguable on at least two counts.
- 19. Firstly, the framing of this responsibility as being placed in communities is somewhat limiting both in terms of scope and reach. In terms of reach this responsibility can be limited just to the children who live around me or whose families share some common interest with mine. While such a collective responsibility is much better than an individualistic world view, it is not particularly challenging when we consider the significant structural changes required to address not only child poverty but child health and education inequalities as well. These problems have systemic causes which will only be addressed through systemic change. Such change is a national not a neighbourhood effort so ideally the framing of our collective responsibilities as localised and community scale avoids the point that not all communities have the same resources and opportunities. Specifically where a child lives has an impact on what happens in her and her family's life this is the so-called post-code lottery. By avoiding the fact that geography matters to a child's fortunes or misfortunes we avoid the need to talk about the sources of these differences as well as the remedies for

some of them. Subsequently we can ignore the need for re-distribution between communities in order to address these differences.

- **20.** The second area of contentiousness around the idea of collectively nurturing children in our community is that such nurturing is somehow feasible as a collective activity. Nurturing requires some interaction with a child so the idea that we can all be involved in nurturing every child is questionable. We can however ensure through public policy that every child grows up in a nurturing environment. This might be achieved through the shaping of the social and physical environment which children grow up in and specifically by removing risk and hazard from these. In other words by protecting children from unnecessary harm.
- **21.** A specific focus on harm to children and on ways of protecting children from harm allows public policy to deal structurally with risk and to target attention to those children and their families/whanau who are most at risk. To these ends The Salvation Army believes that the Child Wellbeing Strategy should pay some attention to the risks associated with social hazards. Such hazards include those risks and outcomes linked to alcohol availability, the supply of illicit drugs, gambling and especially Class 4 gaming machines and usurious debt such as that offered by shopping trucks and payday lenders. These activities are typically concentrated in low-income suburbs and towns² and clearly make life more difficult for children living in these communities.
- **22.** The Salvation Army believes that the desired outcomes and potential focus areas offered in the Strategy around the wellbeing domain of children being loved nurtured and safe is too narrow. It is our view that more attention in this domain should be given to the collective duty of protecting children from harm. Essentially the protection being talked about in the draft Strategy is just protection from travel related injury. The harms posed and caused by unhealthy social environments have been completely ignored here and this in our view is a weakness in the Strategy. The Army suggests that the following changes be made to the proposed strategy:

The first desired outcome in the 'loved, nurtured and safe' domain might instead read:

'Families, whanau and their homes and neighbourhoods are safe and nurturing'.

The third desired outcome in the 'loved, nurtured and safe' domain should focus more broadly on risk in the social and physical environments rather than simply on risk from accidents. This outcome might instead be worded as follows:

'Children are protected from harm and unnecessary risk in their homes and neighbourhoods including the risk from injury and the risks associated with social hazards'

Accordingly we suggest that potential focus area 2 is broadened considerably perhaps to read as follows:

'Children are protected in their everyday lives from avoidable injuries and unhealthy physical and social environments.

• The physical environment of children's homes, streets and neighbourhoods are made safer through greater awareness of risks and better public policy and regulation.

- The social environment of children's neighbourhoods and communities is made healthier through the more effective regulation of social hazards associated with alcohol availability, supply of illicit drugs, gambling and loan sharking.
- The particular vulnerability of disabled children and young people to both intentional and accidental injury is addressed.'

CONCLUSIONS

- **23.** The Salvation Army believes that the Child Poverty Reduction Bill and the Child Wellbeing Strategy can be nation building. These efforts, we feel, are some of the building blocks that we need as a national community to create a more just and more deliberate future. What better way of doing so than through the collective love, nurturing and protection of our children? However such an enterprise is not for the faint hearted or the weary given the gaps which exist between the haves and the have nots in our society.
- 24. The Strategy's vision that 'New Zealand is the best place in the world for children' is in our opinion simple, straightforward and can be achieved within a generation. But it won't be achieved without broad based support and without some sacrifice from better off New Zealanders. The Strategy, as it is presently cast, may not gain such support or elicit such sacrifices in part because it is a little too timid. It is too gentle about the nature and scale of challenges we face in ensuring every New Zealand child thrives here in Aotearoa. It is too polite about the existence and causes of inequality and about the links between inequality and racism and poverty.
- **25.** While any strategy should avoid offending people, it still needs to challenge them and be able to offer its stakeholders a clear sense of what is most important. In our opinion the draft Child Wellbeing Strategy does not do these things but it could if it is was more emphatic and deliberate.

CONTACT DETAILS

Inquiries or follow-up actions from this submission should be directed to Lt-Colonel Ian Hutson – Director of the Social Policy & Parliamentary Unit 9(2)(a) mobile 0274-713645

¹ See for example Perry, B. (2018) *Household incomes in New Zealand: Trends in indicators of inequality and hardship 1982 to 2017.* pp.153-155 and p.219

² With respect alcohol outlets see Cameron, M.P., Cochrane, W., Gordon, C., & Livingston, M. (2013). *The locally-specific impacts of alcohol outlet density in the North Island of New Zealand, 2006-2011. Research report commissioned by the Health Promotion Agency*. Wellington: Health Promotion Agency. For Class 4 gambling see Francis Group (2009). *Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health.* Wellington: Ministry of Health