Response from the Northern Ireland Commissioner for Children and Young People to the Office of the First Minister and Deputy First Minister consultation on the ‘Programme for Cohesion, Sharing and Integration’

1.0 Introduction

The Northern Ireland Commissioner for Children and Young People (NICCY) was created under The Commissioner for Children and Young People (NI) Order 2003. NICCY’s primary aim under the 2003 Order is to safeguard and promote the rights and best interests of children and young people in NI.

Under article 7(2)(3) of the 2003 Order, the Commissioner has a statutory duty to keep under review the adequacy and effectiveness of law, practice and services relating to the rights and best interests of children and young people by relevant authorities. NICCY’s remit covers children and young people from birth up to 18 years, or 21 years of age where a child or young person has a disability, or experience of being in care.

In determining how to carry out her functions, the Commissioner’s paramount considerations are children’s rights. NICCY is required under the 2003 Order to base all its work on the United Nations Convention on the Rights of the Child (UNCRC).

1.1 The Programme for Cohesion, Sharing and Integration

NICCY welcomes the consultation on the much anticipated Programme for Cohesion, Sharing and Integration (CSI). The purpose of the Commissioner’s response is to provide advice to the Office of the First Minister and Deputy First Minister (OFMDFM) on how the rights and best interests of children and young people should be protected and promoted within the policy document. The NICCY Youth Panel has also provided comments on the draft CSI Programme, through a consultation session conducted by NICCY staff. The comments specific to the NICCY Youth Panel are highlighted within this document.

Children and young people are among the most vulnerable groups within society. NICCY believes that the focus of Government’s concerns in terms of children and young people within a CSI Programme should be about ensuring they can live in safe communities, free from harm or discrimination. CSI should also highlight what Government will do to protect young people from the threat

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1 Please contact NICCY if a breakdown is required of the age range of the Youth Panel consulted with.
or influence of paramilitary control, and how Government will work towards preparing children and young people to live in a shared society as adults.

Shortly after devolution was restored in 2007, the Young Life and Times (YLT) Survey\(^2\), (a survey of 16 year olds across Northern Ireland) asked respondents “to say what sort of society you want Northern Ireland to be in the future”, in reference to the statement that “the new Assembly has the potential to shape the future for our society”.

Young peoples’ responses overwhelmingly focused on overcoming division and intolerance, and highlighted the impact of division on children and young people. NICCY would take the opportunity to highlight some of the quotes from young people who responded to this question in the Young Life and Times’ Survey:

‘I want a Northern Ireland with no religious tensions. even though there isnt supposed to be anymore its obvious there is. i want a peaceful place and no discrimination! there is even discrimination by the elderly because my generation are often stereotyped’.

‘A society that accepts people for who they are and does not discriminate against each other. A society that welcomes people into their community so that they can live in peace’.

‘A well-run, peaceful place’.

‘I believe it should be one of equality for all, young and old, rich and poor, white or other. The assembly should work together in order to provide a more satisfactory society for all to benefit from’.

NICCY recommends that the responses by young people to the relevant question highlighted in the 2007 Young Life and Times’ Survey (“What sort of society do you want Northern Ireland to be in the future?”), are read and taken into account, to ensure that the CSI Programme delivers effectively on the concerns of young people. The full list of open ended responses to the relevant YLT Survey question have been enclosed for OFMDFM’s attention, as an Appendix to NICCY’s consultation response. NICCY has included the full bibliographic citation for the 2007 YLT Survey in our consultation response.

Having examined the consultation document, NICCY does not believe that the rights or interests of children and young people have been addressed within the draft CSI policy. NICCY is particularly disappointed at the negative portrayal of young people within the draft Programe. We are also concerned that, aside from the negative commentary, children and young people are largely absent from the consultation document.

NICCY wishes to extend an offer to engage with OFMDFM, to discuss and advise as to how the CSI shortcomings can be addressed, in terms of ensuring that the needs and interests of children and young people are appropriately represented. We look forward to hearing from OFMDFM on this matter, and we hope that our response to the consultation will be of benefit to OFMDFM, and the Executive, as CSI progresses.

2.0 Children’s Rights

The United Kingdom (UK) Government is a signatory to the UN Convention on the Rights of the Child, and as such, has agreed to uphold the rights of children and young people contained within the UNCRC. The NI Executive has a responsibility to ensure that children’s rights are upheld in devolved matters, and in the delivery of services by relevant bodies.

Given the importance of the CSI Programme as a vision for a shared society in NI, NICCY is disappointed to note the absence of any human rights principles within the policy document.

NICCY would take the opportunity to highlight the relevant children’s rights of key significance to the CSI Programme. We recommend that the draft Programme be reviewed against the relevant UNCRC provisions, and that these be incorporated into the document as underlying principles.

NICCY would firstly highlight the four General Principles of the UNCRC as core rights which should underpin all policy proposals affecting children and young people:

- Article 2: children shall not be discriminated against in the exercise of any of their UNCRC rights, on the grounds of their (or their parent’s) race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Article 3: all decisions taken which affect children’s lives should be taken in their best interests.
- Article 6: all children have the right to life and to the fullest level of development.
• Article 12: children have the right to have their voices heard in all matters concerning them.

In addition to the General Principles, a range of UNCRC provisions hold particular relevance to the CSI Programme:

• Article 14: children have the right to freedom of thought, conscience and religion
• Article 15: all children and young people have the right to meet together in groups as they wish, and the only restrictions imposed on this right should be those that are necessary in the interests of national security, public safety or order, or for the protection of the rights of others.
• Article 22: asylum seeking children and refugee children have the right to appropriate protection and help. They also have all other UNCRC rights.
• Article 27: children have a right to a standard of living that is good enough to provide for their physical, mental, spiritual, moral and social development.
• Article 29: children’s education should be directed, among other things, towards the development of respect for their cultural identity, language and values, for the national values of the country in which they live and for the country in which they originate, and for other civilisations. Children’s education should also be directed towards preparing them for responsible life in the spirit of understanding, peace, tolerance, equality of sexes, and friendship among all peoples, ethnic, national and religious groups.
• Article 30: children belonging to ethnic, religious or linguistic minorities within a country have the right to enjoy their culture, practice their religion and use their language.
• Article 31: children have a right to engage in play and recreational activities and Government should encourage the provision of appropriate leisure activities for all children and young people.
• Article 37: children must not be subjected to torture or other cruel, inhuman or degrading treatment or punishment. For a child to be arrested or detained, this must be in accordance with the law, and should only be a measure of last resort and for the shortest possible period of time.
• Article 38: Government should take all feasible measures to ensure that children under 15 do not take part in armed conflict. Governments should also take all feasible measures to protect and care for children who are affected by an armed conflict.
• Article 39: Government should take all appropriate measures to promote the recovery and reintegration of children who have been victims of
exploitation, torture, cruel, inhuman or degrading treatment, punishment or armed conflicts.

- Article 40: all children accused or convicted of committing a crime must be treated in a way that helps them to respect the human rights of others, and there should be many options made available to help children and young people who break the law, including care, guidance and counselling.

**NICCY recommends that the relevant provisions of the UN Convention on the Rights of the Child, as highlighted within our consultation response, be incorporated within the CSI Programme as underpinning principles.**

2.1 The 2008 Concluding Observations of the UN Committee on the Rights of the Child

The UK Government (including the devolved NI Government) is monitored for compliance with the UNCRC by the UN Committee on the Rights of the Child. In 2008, the UN Committee delivered its Concluding Observations on the UK, highlighting a number of recommendations regarding the implementation of children’s rights within the jurisdiction. The Committee’s recommendations of relevance to the CSI Programme are highlighted below.

**Discrimination towards children and young people**

The Committee noted that many groups of children, particularly Roma and Irish Travellers’ children, migrant, asylum seeking and refugee children, lesbian, bisexual, gay, and transgender children and children belonging to minority groups, experience discrimination and social stigmatisation. The Committee also highlighted that adolescents experience intolerance and negative public attitudes towards them, including in the media. The Committee recommended that Government address the challenges of discrimination against children, including by:

- “taking urgent measures to address the intolerance and inappropriate characterization of children, especially adolescents, within the society, including in the media” (para 25)
- “strengthening its awareness-raising and other preventive activities against discrimination and, if necessary, taking affirmative actions for the benefit of vulnerable groups of children, such as Roma and Irish Travellers’ children; migrant, asylum-seeking and refugee children; lesbian, bisexual, gay and transgender children (LGBT); and of children belonging to minority groups” (para 25)
**The impact of the conflict in NI on children’s mental health**

The Committee highlighted that children’s mental health in NI is “particularly delicate” (para 56) due to the legacy of the conflict, recommending that:

- “Additional resources and improved capacities be employed to meet the needs of children with mental health problems… with particular attention to those at great risk, including…. children affected by conflict” (para 57)

**Segregation in education in NI**

The Committee stated its concern that education in NI continues to be segregated, recommending that the Government:

- “take measures to address segregation of education in Northern Ireland” (para 67)

**Play and leisure**

The Committee noted that the right to play and leisure is not fully enjoyed by all children, and expressed with particular concern that the reduction in playgrounds has the effect of pushing children into gathering in open spaces, which can be construed as anti-social behavior. The Committee recommended that:

- “the State party strengthen its efforts to guarantee the right of the child to rest and leisure, to engage in play and recreation, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts” (para 69)

**NICCY recommends that the Concluding Observations of the UN Committee on the Rights of the Child, as highlighted in our consultation response, underpin the CSI Programme.**

**3.0 NICCY’s Children’s Rights Review**

In 2009, NICCY launched its Children’s Rights Review, a large-scale report highlighting the gaps, problems and difficulties in the protection, promotion and implementation of children’s rights in NI. The report highlights a number of areas of potential relevance to the CSI Programme. These are set out below.

**3.1 Sectarianism, racism and hatred**

Children and young people participating in NICCY’s Review stated that they do not always feel safe and protected in their local communities and other public spaces. The Review found a range of reasons as to why children and young people do not feel safe, including threatening behavior by other young people or adults (often associated with drug and alcohol misuse), ongoing sectarian
violence and abuse and the continued influence of paramilitaries in certain sectors of society.

LGBT young people and ethnic minority groups reported feeling especially at risk.

3.2 Paramilitary control and violence

In terms of the sustained impact of the conflict, the Children’s Rights Review findings highlight that while many children and young people are now living in communities relatively free from the violence of the conflict, there is a significant number of young people whose lives continued to be marked by fear and/or paramilitary violence and control. Some young people taking part in NICCY’s Review, who lived in interface areas or areas of heightened community tension, spoke at length about their continued experiences of paramilitary control within their communities. Young people noted changes in the last number of years in relation to the focus of paramilitary attention, however young people in certain areas firmly believed paramilitary control remained strong in their communities and that the threat of paramilitary violence is still very real. NICCY would highlight the following quotes from young people who participated in the Review:

‘Look at my ankles and my head, my two ankles were broken and my head was smashed in by them’.

‘More control now… they control everything, who does what an all’.

Young people participating in NICCY’s Review who spoke of their experiences of paramilitaries, for the most part did so in entirely negative terms. However there were a small number of participants who felt that paramilitary presence in their community was positive in terms of the ‘protection’ and ‘policing’ it provided for the community.

3.3 Policing and young people

The majority of participants in NICCY’s Children’s Rights Review, commenting on community safety, expressed a desire for greater measures to ensure safety within local communities and other places where children and young people socialise. Some young people did not welcome increased PSNI presence in their community, on the basis of negative opinions and/or prior negative experiences of the police by themselves, their friends or their families. These opinions appeared to be informed, in variable part, by community affiliations
or cultural identity and by views and/or experiences that the police were generally discriminatory towards youth.

**NICCY recommends that OFMDFM take on board NICCY’s Children’s Rights Review findings as it progresses the CSI Programme.**

### 4.0 Consultation with children and young people

NICCY has frequently expressed concern that section 75 of the Northern Ireland Act 1998 is not being adequately enforced in respect of the age ground, and that public authorities are failing in their duty to meaningfully consult with children and young people on issues that have direct relevance to their lives.

OFMDFM will be aware that article 12 of the UNCRC provides that children have the right to express their opinion in matters directly impacting upon them and have those views given due weight in accordance with their age and maturity. OFMDFM’s 2008-2011 Action Plan for the Ten Year Strategy for Children and Young People states that:

“One of the supporting themes of the 10 year strategy is to ‘develop a culture where the views of children and young people are routinely sought in matters which impact on their lives’ and we as adults and decision makers need to provide the appropriate mechanisms to enable this engagement. Most importantly, we as adults must recognise that children and young people are valued members of our communities. They have a fresh view of life and can challenge existing perceptions which is particularly beneficial in a society emerging from conflict. We must therefore not only respect their right to have a say but more importantly listen to their views and take these on board when planning for the future’” (page 92 of the 2008-2011 Action Plan).

Given the importance of the CSI Programme for all sectors of society in NI, it is fundamental that children and young people are effectively consulted with. It is imperative that buyin is achieved from those young people who are hardest to reach.

The NICCY Youth Panel wishes to ask OFMDFM whether young people had any input to the CSI document produced for consultation. NICCY would appreciate some information on this matter.

In terms of public consultation, NICCY understands that an event was held for young people aged 12-18 on 16 October. NICCY would welcome additional
information in relation to the young person’s on 16 October, and the feedback received from those who attended.

Aside from the young persons’ event, NICCY would request further information as to how OFMDFM has sought the views of an appropriate range of children and young people, across NI.

4.1 The Youth Friendly Version of the CSI Programme

NICCY welcomes the fact that OFMDFM has produced a Youth Friendly Version of the CSI Programme. It is imperative that Government acts on its obligations to ensure that children and young people are meaningfully consulted with in the development of policies which affect them. NICCY would highlight the following direction from OFMDFM in its 2008-2011 Action Plan for the Ten Year Strategy for Children and Young People:

“Understanding is fundamental to enabling participation and it is imperative that our young population are aware of their rights and both encouraged and supported to exercise these. Adults should therefore ensure that they provide information in a way which is easily accessible and understood by young people” (page 92).

Having examined the youth friendly version of the consultation document, NICCY does not believe that it is as accessible or engaging a tool for consulting with young people as it could be. NICCY, in consultation with its Youth Panel, would offer the following points as constructive advice:

- It would be beneficial to include definitions of the main themes covered by the consultation. In particular, it is important that the words “cohesion”, “sharing” and “integration” are clearly defined at the outset.
- The content of the young person’s version could be focused on issues which have most impact on, or relevance to, young people.
- It would be helpful to use more colours within the youth friendly version, in order to make the document more appealing to young people.
- The document should clearly state how young people can give their feedback on the Programme, and offer young people the flexibility of submitting their feedback in various ways.

NICCY would be willing to discuss these matters in further detail if this would be of benefit to OFMDFM.
5.0 Comments on the CSI policy proposals

NICCY welcomes the opportunity to provide feedback on the CSI document for consultation. The focus of our response to the consultation is the issues impacting on children and young people.

5.1 Scope of the CSI Programme

NICCY believes that the document for consultation does not clearly set out the scope of the CSI Programme. The document itself appears to focus largely on tackling sectarianism and racism, however, the scale of the issues relevant to CSI, such as inequalities, injustices, hatred and intolerance, is not clearly addressed.

Within the subsection of the consultation document entitled ‘Scope of the Policy’ (para 1.5 to 1.9) it is stated that:

“We will bring complementary policies to promote equality, fairness, rights, respect and responsibility for all Section 75(1) groups... These policies, and the framework supporting them, will be complementary with this Programme for Cohesion, Sharing and integration.

“Therefore the focus of this policy will be to promote cohesion, sharing and integration for all sections of society.” (para 1.8 to 1.9).

NICCY has examined the consultation document, however, we remain unclear as to how the equality categories relate to the CSI Programme. We have an interest in terms of understanding how the CSI Programme deals with the implications of the equality categories and other forms of disadvantage (economic or social status), given the fact that children and young people are particularly vulnerable to multiple disadvantage. The draft CSI document states that CSI is “one of a family of policies which seeks to tackle prejudice and hate”, and that “complementary policies” will be brought to “promote equality, fairness, rights, respect and responsibility for all of the Section 75(1) groups” (page 4). However, this does not provide any clarity. It is particularly unclear how the CSI Programme takes on board challenges relating to gender or sexual orientation. It would be helpful for the policy document to state in simple terms what it covers, and how it will interrelate with other relevant policies.

5.1.1 The Ten Year Strategy for Children and Young People

NICCY is disappointed that the draft CSI document contains no mention of OFMDFM’s Ten Year Strategy for Children and Young People. The 2008-2011
Action Plan for the Ten Year Strategy highlights the CSI Programme as one of “a number of key strategies, the delivery of which will be instrumental in tackling specific issues facing our children and young people” (page 3).

The Action Plan goes on to state:

“It is envisaged that youth will be a central priority within the new policy with particular focus on working with communities living in interface areas to eliminate sectarian attacks, youth rioting and civil disturbance” (page 5).

Having examined the CSI consultation document, NICCY does not believe that “youth” appear as a “central priority” within the draft Programme. Where young people are referred to within the consultation document, they are portrayed overwhelmingly negatively. Aside from young people, there is little reference to the intended strategic direction of CSI with regard to ‘children’ within any part of the consultation document.

**NICCY recommends that the policy clearly set out how the CSI Programme will complement the Ten Year Strategy, including how it will contribute to the delivery of the Ten Year Strategy outcome areas.**

### 5.2 Definitions of key terms

NICCY believes it is imperative that the Programme includes definitions of the key terms and issues that it is tasked with addressing. The title of the policy document, “Cohesion, Sharing and Integration”, is complex, and definitions of these terms are required so as to clarify what they mean in the context of the Programme.

In reference to an Assembly Answer on the CSI Programme (AQW 925/11), NICCY notes that the First and deputy First Minister state that one purpose of the consultation exercise is to elicit the public and civil society’s views as to their “understanding of the concepts of cohesion, sharing and integration”. NICCY understands the importance of the consultation period in terms of developing the policy document. However, we believe that in order for a meaningful consultation process to take places, consultees must know and understand what they are being consulted on.

This point is particularly pertinent to the matter of consulting with children and young people, which is addressed in section 4 of our response, above.
5.3 CSI vision, aims and objectives

NICCY believes that the CSI Programme needs to set out more clearly exactly how the public can expect to benefit from CSI if it is implemented. There are case studies presented throughout the consultation document showing examples of initiatives which are benefitting specific communities or groups. However, the policy document needs to specifically state a vision for what it hopes to achieve. It needs to be clear what the purpose of the document is.

NICCY recommends that a clear vision statement, accompanied by aims and objectives, are included in the CSI Programme.

5.4 Leadership and accountability

Strong, united, political leadership will be key determinants of the success of the Programme. The NICCY Youth Panel believes that this is a key challenge for the Executive in terms of CSI. Government must ensure that this is in place, and that civil society is brought on board. NICCY has listened to the views of stakeholders in relation to the mechanisms proposed for leading and delivering the CSI Programme. We are not convinced that buy-in has been achieved at this stage of the consultation.

NICCY understands that the draft Programme proposes that a Ministerially-led Panel be set up for CSI, headed by OFMDFM Ministers. It should be clear who is directly responsible for leading the Programme – OFMDFM or the Executive? Whatever mechanism is proposed, it must be transparent. It must be capable of receiving strong support and buy-in. Each Minister must take responsibility for delivering on the Programme across the work of their Department.

NICCY believes that it will be crucial that CSI delivery be accompanied by a strong and effective accountability mechanism.

5.5 CSI actions and timeframes

NICCY has an expectation that the CSI policy will include concrete actions which the Government proposes to take in order to benefit children and young people. For example, within the Foreword to the draft policy, it is stated that “we are committed to addressing the issues for disaffected young people” (page 1). However, there are no concrete actions within the draft policy stating how Government will do this.
We note that a number of “themes for action” are stated within chapter 2 of the consultation document (entitled “Political leadership/community engagement”). One of the “medium term” themes for action is stated to be “the relationship between young people and the community” (page 8). NICCY would seek clarification from OFMDFM as to what this means. We understand that the consultation document is intended to provide high level direction, however, the consultation also should give an indication as to what the Government is proposing to do, and how it will create a cohesive, shared and integrated society.

NICCY recommends that clear actions, targets, timeframes for implementation and indicators be developed as soon as possible. The needs and interests of children and young people should be visible within any action plan, and there should be a clear link with the Ten Year Strategy and other relevant policies.

5.6 Immigration and asylum

NICCY is pleased that the draft CSI Programme engages on immigration and asylum. In May 2010, NICCY released a policy briefing on ‘Newcomer Children’ in which we named the Executive as a duty bearer within our calls for action to address concerns regarding migrant children and children under immigration control. In this policy briefing, NICCY stated that while matters of immigration and asylum fall outside the competency of the Executive, the task of meeting the needs of migrant children and children under immigration control should be a high priority for the Executive, particularly in terms of service delivery. NICCY is encouraged that the CSI Programme acknowledges that there are issues facing those under immigration control in NI which are a “legitimate concern for the Executive” (para 1.12 of the consultation document). This is an important statement, and NICCY would welcome engagement with OFMDFM as to how the rights and best interests of children falling under immigration control can be most effectively addressed in NI.

5.7 Education

While the theme of education is present within the draft Programme, NICCY expected that it would be a prominent feature of the policy document, and indeed, a substantive priority.

The consultation document identifies “sharing in education” as one of the themes which CSI will support (para 3.6). It also includes statistics on educational preferences, such as those from the NI Life and Times Survey, which indicate that a sizeable proportion of the population would prefer their
children to attend mixed religion schools. The consultation document further provides brief commentary on the role of the Department of Education (DE) in encouraging integrated education. Elsewhere in the document, some information is provided about the relevance of the Citizenship element of the Revised Curriculum.

However, the draft policy document is lacking in clear, concrete actions and specific proposals informing how education would be used as a tool to create a cohesive, shared and integrated society.

It should be clearly set out within the CSI Programme how it is linked to relevant DE policies, and what relationship will exist between DE and OFMDFM (or other individual departments) in working towards shared education, improving community relations, and promoting inclusion and diversity, and other related goals.

NICCY believes that the CSI Programme offers a timely opportunity to promote a process of debate on educational values and structures in NI. Education in NI is a complex area, and a CSI policy could potentially add value to a number of educational debates, including the way in which the post-primary transfer process takes place, or indeed the structure of post-primary education provision, or how the schools’ estate is managed. As a high level strategy, CSI could be an underpinning document for a whole range of educational policies.

The CSI policy should also give due consideration to the practicalities of delivering on community relations in education on the ground, for example, the impact of the funding cuts in DE’s community relations budget could present a difficult challenge.

We have noted that the draft CSI Programme makes reference to relevant curriculum content. Both Personal Development and Education for Mutual Understanding (KS1-2) and Local and Global Citizenship (K3-4) are relevant mechanisms for working towards CSI objectives. The CSI policy should acknowledge the contribution that both the curriculum and teachers make to enhancing understanding of CSI issues, and to encouraging pupils to engage positively and constructively with the issues, and with each other.

On a policy level, it is encouraging that the draft CSI Programme makes reference to DE’s ‘Community Relations, Equality and Diversity in Education’ (CRED) policy out for consultation. However, NICCY has noted that the Early Years strategy is surprisingly absent from the CSI document.
In light of our comments, **NICCY recommends that the CSI policy be redrafted to include education as a strong priority. The redrafted document should include concrete proposals and action points as to how education policy and delivery can be used as mechanisms to deliver on a CSI vision. It should be clear as to how CSI can underpin education strategies.**

6.0 Concluding comments

We have stated throughout our consultation response our disappointment at the way in which young people have been addressed in the draft policy document. NICCY is calling for serious overhaul in the commentary, tone and language used to describe the relevance of CSI to young people.

NICCY is focused on addressing negative stereotypes and intolerant attitudes of young people in NI. The way in which young people are addressed in the draft Programme is not constructive, and risks reinforcing negativity against young people in NI.

NICCY believes that the commentary on young people within the consultation document implicitly blames and associates youth with many of the problems related to community tensions, violence and antisocial behaviour. This is unhelpful. It will not achieve positive outcomes for young people within CSI, nor gain their collective buy-in to the Programme.

What the consultation document should address, for example, is how Government will take responsibility for meeting the needs of young people most impacted by community divisions and deprivation. The CSI Programme should propose what will be done to ensure that children and young people are protected from exploitation by paramilitaries, for example, through exploitation in community violence.

In January 2010, NICCY released a policy briefing in relation to Child Poverty, and in March 2010, we released a policy briefing regarding Community Safety. These briefing papers were delivered to the Executive and relevant departments as duty bearers for a number of calls to action. The briefings are part of NICCY’s ‘Make it Right’ campaign, through which children and young people have been engaging on the issues, to call for action in relation to key child rights challenges. It may be of benefit to the CSI policy drafters to consider some of the ‘Make it Right’ messages from young people, regarding the need for Government to make communities safer:
'I’d like them to make it [community safety] quite high priority as safety is very important for everyone but especially children. People should be able to walk down the street at anytime of the day without being scared and at the minute we can’t do that’.

‘Punishment isn’t always the answer, instead of enforcing ASBO’s give the [young] person a chance to explain themselves as they might need help. You need to understand people more, as their actions may have other reasons behind them, for example problems at home’.

‘Go out and talk to young people in the communities and find out their opinions on how to make communities safer, actually take onboard their opinions’.

NICCY specifically pointed to OFMDFM in our Community Safety policy briefing as a key stakeholder in increasing efforts to overcome community divisions and address the threats they pose for children and young people. These briefing papers should be of benefit to progressing CSI, and we recommend that they are taken on board, alongside NICCY’s Newcomer Children briefing and Children’s Rights Review findings (both highlighted above).

On a positive note, it is encouraging that the draft CSI Programme makes reference to the need to address the issues and barriers facing young people who are not in education, employment or training (para 4.12 of the consultation document). It will be essential that the CSI policy document state clearly how the findings of the relevant DEL scoping study on young people not in education, employment or training will be actioned upon in the delivery of CSI. As we highlighted earlier in our response, it must be clear within the policy document how CSI relates and links to, not only statutory equality considerations, but also economic and social need.

**NICCY recommends that the CSI document be rewritten to have a more positive focus on children and young people. The policy must not treat young people in an overwhelmingly negative way, nor blame young people for community tensions or violence. This is fundamentally unacceptable.**

**NICCY recommends that the CSI document include proposals as to how Government will take responsibility for meeting the needs of young people who are most impacted by community divisions and deprivation. The CSI Programme should propose what will be done to ensure that children and young people are protected from exploitation by paramilitaries, for example, through exploitation in community violence.**
7.0 Follow-up

NICCY appreciates the opportunity to respond to the CSI policy proposals. We would like to meet with OFMDFM in order to discuss how to constructively address some of the issues regarding the way in which children and young people are addressed in the consultation document.

NICCY recommends that OFMDFM engage with the Children’s Commissioner, as well as with children and young people themselves, in order to address the shortcomings of the CSI consultation document with regard to children and young people.

To arrange a meeting to take forward discussions, please contact Caroline Cunningham, Policy and Research Officer, in first instance (caroline@niccy.org, 02890316384).

Recommendations

- NICCY recommends that the responses by young people to the relevant question highlighted in the 2007 Young Life and Times’ Survey (“What sort of society do you want Northern Ireland to be in the future?”), are read and taken into account, to ensure that the CSI Programme delivers effectively on the concerns of young people. The full list of open ended responses to the relevant YLT Survey question have been enclosed for OFMDFM’s attention, as an Appendix to NICCY’s consultation response. NICCY has included the full bibliographic citation for the 2007 YLT Survey in our consultation response.

- NICCY recommends that the relevant provisions of the UN Convention on the Rights of the Child, as highlighted within our consultation response, be incorporated within the CSI Programme as underpinning principles.

- NICCY recommends that the Concluding Observations of the UN Committee on the Rights of the Child, as highlighted in our consultation response, underpin the CSI Programme.

- NICCY recommends that OFMDFM take on board NICCY’s
Children’s Rights Review findings as it progresses the CSI Programme.

• NICCY recommends that the policy clearly set out how the CSI Programme will complement the Ten Year Strategy, including how it will contribute to the delivery of the Ten Year Strategy outcome areas.

• NICCY recommends that a clear vision statement, accompanied by aims and objectives, are included in the CSI Programme.

• NICCY recommends that clear actions, targets, timeframes for implementation and indicators be developed as soon as possible. The needs and interests of children and young people should be visible within any action plan, and there should be a clear link with the Ten Year Strategy and other relevant policies.

• NICCY recommends that the CSI policy be redrafted to include education as a strong priority. The redrafted document should include concrete proposals and action points as to how education policy and delivery can be used as mechanisms to deliver on a CSI vision. It should be clear as to how CSI can underpin education strategies.

• NICCY recommends that the CSI document be rewritten to have a more positive focus on children and young people. The policy must not treat young people in an overwhelmingly negative way, nor blame young people for community tensions or violence. This is fundamentally unacceptable.

• NICCY recommends that the CSI document include proposals as to how Government will take responsibility for meeting the needs of young people who are most impacted by community divisions and deprivation. The CSI Programme should propose what will be done to ensure that children and young people are protected from exploitation by paramilitaries, for example, through exploitation in community violence.
• NICCY recommends that OFMDFM engage with the Children’s Commissioner, as well as with children and young people themselves, in order to address the shortcomings of the CSI consultation document with regard to children and young people.