

Michelle Bell
Equality Branch
Department of Agriculture and Rural Development (DARD)
Room 509, Dundonald House
Upper Newtownards Road
Belfast
BT4 3SB

patricia lewsley
commissioner

gerard campbell
chief executive

22 January 2010

Dear Ms Bell

Re: Draft DARD Children and Young People's Action Plan 2010 – 2012

Thank you for the opportunity to provide our comments on DARD's draft Children and Young People's Action Plan.

NICCY was created in accordance with 'The Commissioner for Children and Young People (Northern Ireland) Order' (2003) to safeguard and promote the rights and best interests of children and young people in Northern Ireland.

Under articles 7(2)(3) of this legislation, NICCY has a mandate 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. The Commissioner's remit is children and young people from birth up to 18 years, or 21 years of age if the young person is disabled or in the care of Social Services.

In determining how to carry out her functions, the Commissioner's paramount consideration is the rights of the child and NICCY is required to base all its work on the United Nations Convention on the Rights of the Child (UNCRC).

NICCY has reviewed DARD's Action Plan and we offer our feedback below under a number of key themes. We would, however, like to begin by commending DARD for the benchmark they have set with this Action Plan in terms of their commitment to participation with children and young people in policy development, and their efforts to meaningfully engage with organisations that represent children's rights and interests. We hope that other Government Departments are able to learn from DARD's approach.



Responsibilities in terms of children's rights and participation

NICCY welcomes DARD's acknowledgement of its shared obligations under the UNCRC and OFMdfM's Ten Year Strategy for Children and Young People. We are also encouraged that DARD has endorsed NICCY's Participation Policy Statement of Intent and has met with members of NICCY's Participation Team, and as members of the Commissioner's Participation Forum, has talked to our staff in the development of this Action Plan. NICCY understands that DARD has worked with a range of organisations representing children and young people in the development of the draft Plan. We recommend that DARD continue to avail of the support and services offered by bodies such as the Participation Network, the Youth Forum and the Young Farmers Clubs; encouraging other Government Departments to follow this example.

In terms of consulting with children and young people, and given the challenge of accessing hard-to-reach groups, we would gratefully ask DARD to clarify how it will gain the views of a proportionate spread of children and young people across all rural areas in Northern Ireland.

Impact of Agriculture and Rural Development issues on children and young people

In relation to the Action Plan itself, we note that DARD has helpfully set the context in terms of explaining the Department's five main goals and how they impact on the "future lives" of children and young people. While some of these goals relate directly to rural economy and employment, others relate either directly or indirectly to sustainability issues in terms of the physical environment and how to ensure the best impact on children's future lives. In this context, NICCY hopes it will be helpful to highlight the fact that the Commissioner's policy engagement at the international level has more recently raised 'climate change' as a key issue impacting on children's rights. Indeed, in June of last year, the Commissioners and Ombudspersons for Children from the G8 countries met and prepared five recommendations on children's rights to bring to the annual G8 summit. The second of these recommendations called upon the G8 to "Address climate change now" in order to mitigate the negative impact on children. Linking this back to Northern Ireland, we are pleased to see that DARD has recognised this issue as one which impacts on children at a regional level. NICCY recognises that climate change is a challenging issue to engage on with children at a local level. However, we also know that sustainability of the environment could adversely affect children from rural areas and we recommend that the Department keeps under review how it engages with children on this issue.

Inequalities experienced by vulnerable groups for consideration in the implementation of the Action Plan

NICCY notes that DARD set out in their Action Plan a number of ways in which children and young people can benefit from their work. In this context, we would highlight to DARD some of the findings from NICCY's recent Children's Rights Review which we recommend that the Department take on board as it works towards implementation of the Action Plan.

1. Road safety issues for rural children

The Children's Rights Review indicated that children from rural areas experience barriers to the effective enjoyment of their rights in terms of road safety issues. NICCY welcomes the Action Plan's commitment to work alongside DRD to provide rural transport schemes. We expect that DARD will have a strong link-in to the upcoming DRD Road Safety Strategy for consultation.

2. Childcare difficulties in rural areas

NICCY notes DARD's comment around the benefits of the Rural Childcare Programme for children and families. We understand that the Rural Childcare Stakeholders' Group (established by DARD to consider the key issues affecting families in rural areas) reported to the Minister in 2008 on the distinct challenges facing parents living in rural areas in accessing childcare. We expect that implementation of the Action Plan will tie in with the Group's recommendations.

3. Inequalities for rural young people in accessing sexual health services

NICCY's Children's Rights Review identified barriers in terms of the distance that some young people in Northern Ireland have to travel in order to access sexual health-related clinics. NICCY recommends that DARD keep this issue under review in terms of cross-links with the Action Plan.

4. Inequalities for rural children and young people in terms of play and leisure

NICCY notes that DARD's Plan includes a number of actions regarding leisure, play and culture. These actions relate to recreation activities such as visits to forest parks and adventure activities. These are helpful initiatives in terms of families, however, we are aware, through our Children's Rights Review findings, that older groups of young

people in rural areas are particularly disadvantaged by a lack of appropriate things to do and places to go. A particular issue for older young people includes proximity to facilities and how to reach them. We would recommend that the Department give further consideration to this issue.

Monitoring and measuring progress on the delivery of the Action Plan outcomes


We note that the Action Plan sets out a range of outcomes for achieving its actions under each of the key areas. DARD has set timescales for the delivery of these outcomes and it is also essential that DARD be able to clearly demonstrate how it has achieved the outcomes and how the action plan has had a positive impact on children's lives. It is important that DARD have a clear focus as to how it will follow-up and evaluate the mechanisms it uses to implement and deliver upon of the action plan outcomes. NICCY would particularly welcome the Department focusing the Action Plan targets more directly around achieving positive outcomes for children and young people who experience systemic inequalities.

Follow-up

NICCY would once again thank DARD for the opportunity to comment on the draft Action Plan. We welcome the proactive approach that DARD has taken in terms of taking seriously its responsibilities to engage with children and young people and we are happy to continue to advise the Department as it further develops its policy regarding this.

If DARD requires any clarification regarding our comments, or would like to discuss the issues with NICCY in further detail, please contact Caroline Cunningham, Policy and Research Officer, on 90316384 or caroline@niccy.org.

Yours sincerely



Alex Tennant
Head of Policy and Research