

## **Response to OFMDFM consultation on draft Child Poverty Strategy**

**February 2011**

### **1.0 Introduction**

The Office of Commissioner for Children and Young People (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 remit of our Office 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).

### **1.1 The impact of poverty on children's lives**

NICCY welcomes the opportunity to respond to OFMDFM consultation on Child Poverty Strategy. We consider that this is an important Strategy in tackling child poverty in Northern Ireland. Child poverty remains one of the most pressing child rights issues, and tackling it must be a high priority for government. Child poverty blights children's lives and has wide-reaching effects, both on the children and on Northern Ireland society.

Poverty pervades every aspect of children's lives – particularly when it is more than a temporary experience. A lack of money results in parents having to make hard decisions between basic necessities, such as heating their home, buying healthy food, providing appropriate clothing for their children, and paying for their children's school and leisure activities.

The impact on children throughout their childhood is severe, including:

- Higher infant mortality rates
- Greater physical and mental ill-health
- Inadequate nutrition



- Unfit housing conditions
- Higher rates of both road traffic and domestic accidents
- Lack of play and leisure opportunities
- Lower educational engagement and attainment
- Worry about household finances and burden of responsibility
- Increased likelihood of teenage pregnancy, or drug or alcohol abuse
- Increased likelihood of being 'not in education, employment or training' at 16.<sup>1</sup>

The impact of poverty as a child not only diminishes their childhood, but narrows their opportunities in the future. As adults they are more likely to be unemployed, or in low paid work. They are more likely to experience poverty, and have children who grow up in poverty.

## **2.0 International Law**

Given NICCY's status as a child rights-based institution, we would take the opportunity to highlight the relevant international standards which the Department has a responsibility to uphold within the terms of its policy proposals.

### **2.1 Children's Rights**

The UNCRC provides the overarching framework which guides the work of NICCY. The UK Government, including Northern Ireland, is a signatory to the Convention and has agreed to uphold the rights of children and young people based on the Convention.

NICCY appreciates that there are often complexities when reconciling the rights of children and young people with their welfare and best interests. NICCY would recommend the proposals are reviewed against the relevant articles within the UNCRC and incorporate them in the policy as underlying principles, to ensure that the rights and best interests of children and young people are upheld and protected.

The references in section 2.42 of the draft document to Articles 26 and 27 are to be welcomed. Indeed, these two articles outline the right of the child to a standard of living adequate for the child's physical mental, spiritual and social development, and their right to benefit from social security. However, as NICCY pointed out in our advice to the Department in the Pre-consultation

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<sup>1</sup> NICCY (2008), Children's Rights Review, page 256.



phase, Article 2 states that all children have a right to equal access to all rights in the UNCRC.

We would firstly highlight the four General Principles of the UNCRC as core rights which should underpin the policy proposals:

- Article 2: children shall not be discriminated against and shall have equal access to all articles in the UNCRC.
- Article 3: all decisions taken which affect children's lives should be taken in the child's 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.

Other rights of particular relevance are:

- Article 24: the right to the enjoyment of the highest attainable standard of health and to facilities for the treatment of illness and rehabilitation of health. Measures to be taken include those to reduced infant and child mortality, ensuring provision of the necessary medical assistance and healthcare, to combat disease and malnutrition, and to ensure appropriate pre-natal and post-natal health care for mothers, and preventative healthcare to children.
- Article 28: the right of access to education.
- Article 29: the responsibility on the State to direct children's education towards a specific set of aims. This includes the aim of developing children's personalities, talents and mental and physical abilities to their fullest potential.
- Article 31: the right to rest and leisure, to engage in play and recreational activities and participate in cultural life and the arts.

NICCY would also highlight the obligations in Article 4 of the UNCRC to undertake **all** appropriate measures (including legislative measures) to the **maximum extent** of their available resources in terms of implementation of economic, social and cultural rights of children.

NICCY recommends that the Child Poverty Strategy reflects more comprehensively the relevant articles of the UNCRC and outlines how these rights will be realised through the Strategy.



## **2.2 Concluding Observations of the UN Committee on the Rights of the Child (2008)**

In its Concluding Observations in its Report on the United Kingdom in October 2008, the United Nations Committee on The Rights of the Child ('the Committee') made a number of recommendations regarding tackling child poverty.

NICCY welcomes the fact that the draft Strategy, on pages 32 and 33, lists a number of these recommendations, however there is no discussion over how the Strategy aims to address them.

NICCY recommends that the Department ensure that its strategy contains specific actions in response to the UN Committee on the Rights of the Child's 2008 Concluding Observations.

## **3.0 Research and analysis**

### **3.1 NICCY's Children's Rights Review (NICCY 2008)**

In 2007, NICCY carried out a major review of children's rights, published in 2008 which highlights the gaps, problems and difficulties in the protection, promotion and implementation of children's rights in Northern Ireland.

Concerns regarding the rights of children experiencing poverty featured throughout the report and included:

- The health inequalities associated with child poverty
- The educational inequalities experienced by children in poverty
- Homelessness
- Access to play and leisure opportunities

NICCY recommends that the Department to take on board the Children's Rights Review findings as it develops its Strategy post-consultation.

### **3.2 The Make It Right campaign**

Throughout 2010 NICCY ran a campaign marking 20 years of the UNCRC, calling on Government to meet its commitments under the convention and 'Make it Right' for children in Northern Ireland. Each month we released a policy briefing on a key child rights issue, as well as a campaign briefing for children and young people.



Each of these briefings identified three calls to government. Over the year more than 2,000 children and young took action in support of these calls.

NICCY's first policy briefing, released in January 2010, focussed on child poverty. It welcomed the introduction of the UK Child Poverty Bill and recognised its potential to provide a mechanism for a coherent child poverty action plan. However, the deep seated nature of the problem does not lend itself to easy solutions, and it cannot be addressed by minor adjustments.

NICCY calls on both the UK Government and the NI Executive to develop a comprehensive, resourced action plan to end child poverty, with a particular focus on children in severe poverty or persistent poverty, stating that it should include the following three actions.

1. Raising the income levels of families experiencing poverty to ensure that children's material needs are met.

Government research shows that children living in poverty regularly go without basic necessities because their parents can't afford them.<sup>2</sup> While parents cope by going without themselves, this can only provide a temporary solution. Too often children also have to go without key items, such as healthy food and warm clothes. This is particularly the case where they are experiencing severe or persistent poverty.

A 2008 study by JRF consulted widely on the items generally considered by the public as necessities.<sup>3</sup> The minimum income required for a family of two adults and two children was calculated to be £349 (excluding housing costs and childcare). This was £124 above the weekly benefit level, an annual discrepancy of more than £6000.

NICCY calls on Government to take action to increase income levels, through increasing benefit levels and minimum wage levels. According to DETI, Northern Ireland wages are the lowest in the UK, with median salary only 90% of that in GB.<sup>4</sup> This means that – particularly for unskilled workers – work is no route out of poverty. Economic development strategies must seek to create better paid jobs.

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<sup>2</sup> DSS HBAI reports

<sup>3</sup> Bradshaw, J., et al (2008), A minimum standard for Britain: What people think, (York: JRF).

<sup>4</sup> NISRA (2009), Northern Ireland Annual Survey of Hours and Earnings 2009, (Belfast: DETI).



Other actions that should be taken to increase family income levels are to provide vocational training to parents, provide fuel payments and reduce the costs associated with school, with play and leisure activities and transport.

## 2. Ensuring better provision of accessible, affordable, high quality childcare to facilitate parents to work.

Improving opportunities for parents to take and remain in work is a central focus of Government strategies for tackling child poverty. As part of this, a number of policies have been developed, including New Deal, which offers subsidised work or education to long term unemployed or young people. The UK Government is currently implementing a welfare reform strategy which seeks to increase the lone parent 'in work' rate through a combination of support and compulsion – the ultimate sanction being a reduction in benefit levels.

In Great Britain, these developments have gone hand-in-hand with a resourced childcare strategy, including a statutory duty on local authorities to ensure adequate child care provision is in place. A Transformation Fund was established in England to invest in high quality, sustainable, affordable provision. In contrast, in Northern Ireland there is no lead Government department, no statutory duty, limited resources and – as a result – a “woefully inadequate” level of childcare provision.<sup>5</sup>

NICCY calls on the NI Executive to develop a long-term, fully resourced childcare strategy to increase the level of provision, particularly in areas of disadvantage, in rural areas, and for children with disabilities. While this must be cross-departmental, one department must take the lead. A statutory duty to ensure sufficient childcare provision should also be considered.

## 3. Tackling the particular disadvantages experienced by 16 and 17 year olds who are living independently, and/or not in education, employment or training.

Action plans to end child poverty must include a focus on the needs of 16 and 17 year olds – particularly those not in education, employment or training, or living independently. JRF research on minimum income

<sup>5</sup> Committee for OFMDFM (2008), Final report into the Committee's Inquiry into Child Poverty in Northern Ireland, (Belfast: NI Assembly).



standards found that a single working age female in NI needed £166.40 per week to cover basic costs of living – excluding housing costs.<sup>6</sup>

Benefit levels for 16 or 17 year olds are a fraction of this, for example:

- If in training, and living independently, they will be entitled to housing benefit and a maximum of £50.95 EMA and IS.
- If not in education, employment or training, and living at home, they will not be entitled to any benefits or payments.

Items such as food, clothing, heating and transport cost the same for 16 year olds as for adults. Such low incomes, therefore, result in extreme hardship. NICCY calls on government to match the provision for 16 and 17 year olds living independently to the levels provided to adults, and to pay benefits to parents for children living at home up to the age of 18.

DEL should develop and implement a strategy for supporting young people not in education, employment or training to develop skills and find decently paid employment.

NICCY calls on the Executive to prioritise taking forward each of the three calls above in the Child Poverty Strategy

### **3.3 NIAPN research and workshop**

In 2009-10 NICCY funded the Northern Ireland Anti Poverty Network to conduct a piece of participatory research with marginalised young people aged 16-17 to investigate their particular experiences of poverty. This report highlighted the very difficult situation many find themselves in – particularly if they are living independently of their parents.

As part of the Make it Right campaign, in February 2010 NICCY held a roundtable event with a range of statutory and voluntary organisations, and with some of the young people involved in the NIAPN research. This focussed on the particular needs of 16 and 17 year olds and the types of actions that should be included in the Child Poverty Strategy for this age group. Annex 1 contains a briefing on some of the key recommendations developed during this event.

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<sup>6</sup> Smith, N., et al (2009), A minimum standard for Northern Ireland, (York: JRF).



While recognising that the UK Child Poverty Act 2010 requires the Northern Ireland Executive to report on actions it has taken to reduce child poverty for children aged 0-15, NICCY believes that the particular hardships faced by 16 and 17 year olds need to also be addressed in this strategy. OFMDFM should also take into account the recommendations developed in NICCY's roundtable event in February 2010.

#### **4.0 Consultation with Children and Young People**

NICCY has regularly expressed through a broad range of policy and consultation work our concern that section 75 of the Northern Ireland Act 1998 is not being adequately enforced in respect of the age criterion and that public authorities are consistently failing in their duty to meaningfully consult with children and young people on issues that have direct relevance to their lives.

The Department should bear in mind 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. With this in mind, NICCY clearly has a particular interest in hearing further information from the Department as to how it has sought the views of children and young people experiencing poverty, and children and young people generally.

NICCY recognises that the Department has taken a proactive approach to engaging with children and young people, and was pleased to see plans in relation to this consultation exercise being shared in July 2010. Moreover, the Department is to be commended on its proactive production of a children's version of the draft Strategy.

Having said this, the duration of the consultation being only eight weeks, and falling over the Christmas holidays did not lend itself to extensive consultation with children and young people. NICCY understands that the Department ran some events with children and young people, one in tandem with the consultation on the Play Implementation Plan. We request information on these consultations and one how the information gathered will inform the production of the final Child Poverty Strategy.

NICCY requests clarification of how OFMDFM has gathered the views of children and young people experiencing poverty and children and young people generally. We would also ask the Department to outline how those views will influence the development of the policy proposals.



## **4.1 The views of children and young people in relation to child poverty.**

OFMDFM, in addition to consulting children and young people directly about the draft Child Poverty Strategy, should also take account of views expressed by children and young people through other sources. NICCY would particularly highlight two sources that can provide useful information on children and young people's views in relation to child poverty:

- Actions taken by children and young people as part of NICCY's Make it Right campaign
- Young Life and Times Survey 2007 questions in relation to political action on child poverty.

### **4.1.1 Children and Young People engaging in the Make it Right campaign**

Several hundred children and young people took action in 2010 in support of NICCY's calls on child poverty. Some typical comments to the Executive included:

- *"More action and support is vital for children and young people who are within child poverty as it is greatly increasing within the last few years due to the recession; by ignoring the children in these situations we are allowing them to suffer physically and emotionally."*
- *"It is harder for a child to admit they are living in poverty, so twice the work needs to be done to check they are OK. They need more encouragement to speak up so access to information and platforms for communication at the level and comfort of the child is paramount."*
- *"Poverty affects all aspects of a child's life and therefore is very important. It can also lead to criminality and health and education problems which will eventually cost the public sector more in the long run. The government should therefore not complain later when they do not look after someone early in life."*
- *"It is tragic the troubles young people have to face. Living in poverty they cannot enjoy their childhood instead having to take on adult worries and responsibilities. These children should have access to what*



*they need to live a healthy life free from illness caused by poverty both physically and mentally. Poverty should be ended!"*

- *"No call for it at all. We have a welfare state that can provide money for those on disability allowance etc. and this should be addressed at child level."*
- *"Actions speak louder than words!"*
- *"Why aren't you doing anything to help when you have the power to? This should be a priority."*
- *"Use your position to help children living in poverty as best as possible. Make a difference."*

A wider selection of their comments is attached in Annex 2.

#### **4.1.2 Views of Young People from Young Life and Times Survey 2007**

In 2007 the Young Life and Times Survey included a number of questions that asked the young respondents about their perceptions of and opinions on, child poverty. Two questions are particularly relevant to this consultation. The first asked about the priority the Assembly should give the child poverty:

*'The Northern Ireland Assembly was restored in May of this year. Do you think that child poverty should be a low or high priority for the new Assembly?'*

Almost nine in ten (85%) stated that it should be a high priority for the Assembly, and only 2% felt that it should be a low priority.<sup>7</sup>

A second question asked about the introduction of legislation to prevent discrimination on the basis of poverty:

*'In Northern Ireland laws prevent people from being discriminated against, for example because of their age, their religion, their race, and whether they are disabled or not. Do you think that these laws should be changed in order to prevent people from being discriminated against because they are poor?'*

Around three-quarters (74%) agreed with this proposal and 16% disagreed.<sup>8</sup>

<sup>7</sup> [www.ark.ac.uk/y/t/2007/Poverty/POVPRIO.html](http://www.ark.ac.uk/y/t/2007/Poverty/POVPRIO.html) Base: 627 young people aged 16.

<sup>8</sup> [www.ark.ac.uk/y/t/2007/Poverty/POVLAW.html](http://www.ark.ac.uk/y/t/2007/Poverty/POVLAW.html) Base: 627 young people aged 16.



Both the Make It Right campaign and Young Life and Times survey has provided strong evidence of a clear demand from children and young people for concerted government action in relation to child poverty – this is evident from the level of support for the Assembly making this issue a high priority. There was also considerable support for legislation to prevent discrimination on the grounds of poverty.

Following the Assembly elections in May, the new Executive should make child poverty a high priority in its Programme for Government. This must go beyond rhetoric and be reflected in the prioritisation of resources, both in terms of financial resources, as well as government personnel developing innovative programmes to tackle child poverty.

The Executive/NIO should also consider amending Section 75 of the Northern Ireland Act 1998 to include poverty as one of the equality categories.

## **5.0 Comments on the specific policy proposals**

NICCY welcomes the opportunity to provide our feedback and recommendations on the content of the policy proposals. These comments are presented below, as far as possible reflecting the ordering of the Consultation Response Booklet. However, it is notable that this booklet only asks about a proportion of the draft Strategy, and ignores everything from section 2.13 onwards. It is not clear why the consultation questions have been limited to these sections.

### **5.1 General comments on structure of Strategy**

The Strategy should provide a clear focus for the Northern Ireland Executive and Departments to deliver on its statutory responsibilities as laid out in the UK Child Poverty Act 2010 (hereafter the 2010 Act). However, it is NICCY's considered opinion that the document does not provide a clarity of focus or approach, and that it is not presented as a coherent document. NICCY is pleased at the recognition in the document that it is 'imperative that we work together jointly towards a common aim' and that 'this Strategy will provide the means to encourage an effective and joined up approach to address and eradicate child poverty', but is disappointed by the lack of focus and 'joining up' in this document. Indeed, it appears almost as a collation of a number of smaller documents rather than coherent Strategy.



The order of the sections, for example, is confusing. Some aspects that one might expect at the start of the Strategy including the section on 'The need for a Child Poverty Strategy' and the section outlining the effects of poverty on children and young people. Instead these appear after the sections on the framework for the Strategy and the priority action areas. If this Strategy is to adopt an 'evidence based approach' and to 'shift towards tackling the root causes of poverty' it is essential that the evidence of the impact of poverty on children, and an analysis of the root causes of poverty would feature early in the document, prior to the identification of priority action areas. Similarly, the targets are not discussed until after the framework and priority action areas are addressed.

The Strategy needs to be refocused and written in a more coherent form taking into account the above comments.

## 5.2 Framework vs 'life stage' approach

### **NICCY neither agrees nor disagrees with the Framework outlined in chapter 2.**

In general the framework is helpful in that it not only has a focus on meeting the 2020 income targets, but also seeks to minimise socio-economic disadvantage for children. The four strategic priorities are generally positive although what is meant by the fourth 'financial support is responsive to families' situations' is not entirely clear.

There appear to be a few different versions of the first priority. In the DWP document in which the Framework was first outlined "Ending Child Poverty: Mapping the Route to 2020" this priority was written:

"Poverty in childhood does not translate into poor outcomes"

In the framework diagram on page 8 of the draft Strategy, this has been amended to:

"Poverty in childhood does not translate into poor outcomes *for children as they move into adult life*"



And on the following page (p9) it has been further amended:

*“Ensure, as far as possible, that poverty and disadvantage in childhood does not translate into poorer outcomes for children as they move into adulthood.*

The first version of this priority is the best for two main reasons. It focuses on the outcomes for children without specifying ‘as they move into adult life’, and it is stated more strongly than ‘Ensure, as far as possible...’

The Framework approach is useful in that it not only focuses on addressing income poverty, but also the quality of life of children, as well as their life chances as they move into adult life. However, it doesn’t take into account the needs of children at different stages. NICCY notes the evidence session of OFMDFM Departmental officials to the COFMDFM on 6 October where it was stated:

‘Up to now we have been looking at the Strategy more in the context of building blocks set out in the legislation, which relate to the skills of the parents, healthcare and childcare almost in a departmental functional sense. We will look at the strategy in that way as well, but we will very much take account of the feedback that we have had that the strategy has to be about what the child needs at each stage of its development and about the needs of different groups of children. The focus will be on what the child needs in the early years, what the child needs as he or she progresses through school, particularly in the transition phase from primary to secondary school, and on young people not in employment, education or training.’ (Hansard official report, COFMDFM, Departmental briefing on the Child Poverty Strategy)

This approach is not evident in the consultation document, and it is the opinion of NICCY that the draft Strategy is the poorer because of this. The interventions required by children experiencing poverty vary due to a range of factors, but perhaps most particularly their age, or life stage. At each stage, early intervention is key.



### **5.3 The Executive's aim and strategic priorities**

**NICCY strongly disagrees with the overarching aim of the Strategy: 'To provide the opportunity for all our children and young people to thrive and to address the causes and consequences of disadvantage'.**

The aim of this Strategy should be primarily about lifting children out of poverty, and alleviating the impact of poverty on children's lives. The wording of the draft aim above seems to place the responsibility for addressing poverty with the children – with government's role being limited to providing opportunities for children and young people to thrive. It seems that it is the role of the child to take up the opportunities and to address the causes and consequences of disadvantage. Moreover, it is essential that the aim should make reference to poverty, rather than the less specific term 'disadvantage'.

**NICCY neither agrees nor disagrees with the Strategic Priorities as listed at 2.12 and proposes a number of changes.**

We have outlined above our opposition to the wording of the first priority, and our preference for the simpler wording: "Poverty in childhood does not translate into poor outcomes"

We are generally positive about the second priority 'Support more parents to be in work that pays' although it may be useful to be more specific about what is meant by 'work that pays' – ie that working should enable families to be lifted above the poverty line.

The third 'Ensure the child's environment supports them to thrive' is very welcome, as it refers to supports being in place to protect children from the impact of poverty – and not solely in order to have positive outcomes as an adult.

The last priority 'Target financial support to be responsive to family situations' is not entirely clear, and NICCY would suggest rewording to provide clarity.

The document states that the priorities will be achieved through focussing on key policy areas including education, childcare, health, family support, housing, neighbourhoods, financial support and parental employment and skills. This is indeed a useful set of policy areas, however, it would be useful to have outcome statements associated with each.



## 5.4 Underpinning principles

### **NICCY generally agrees with the underpinning principles with a few important additions, amendments and queries.**

In general the list of principles are positive in that they read well – however what they actually mean in practice is not explained. For example, the first principle ‘a shift towards tackling the root causes of poverty and not just treating its symptoms’ is very sensible. However the Strategy document itself doesn’t demonstrate that it has taken into account the root causes of child poverty at any point. Significantly, the relationship between the conflict and poverty has not been mentioned.

The second principle ‘Putting children at the centre of the Strategy and taking into account their views when developing policies and programmes to tackle child poverty’ again is very important, but again there is no explanation of how this will be achieved. In reality, there is little evidence of a child centered approach in the document. The draft Strategy mostly focuses on improving children’s life chances as they reach adulthood, as opposed to improving children’s quality of life in childhood.

This is a key facet of a child-centred approach, and indeed, a child rights approach. A child rights approach focuses on government meeting basic minimum standards for children, as set out in the UN Convention on the Rights of the Child, not solely because of the impact this might have on their future life chances, but in order to improve their experience of childhood. NICCY is, however, pleased to see that the views of children will be taken into account when developing policies and programmes to tackle child poverty. This principle should be expanded to include a reference to children’s rights – eg ‘Putting children and their rights at the centre of the Strategy’.

The third principle makes reference to adopting a ‘Life cycle approach’ – ie breaking the cycle of the poor child growing into a poor adult and having children who will in turn live in poverty. This appears to be a reference to the lifecycle approach adopted in Lifetime Opportunities, as well as the need to break the cycle of poverty.

This doesn’t match the advice provided by NICCY and others at the Pre-Consultation Workshop when we recommended a life stage approach as outlined above. From the evidence session of OFMDFM Departmental officials to the COFMDFM on 6 October it had appeared that this recommendation had been adopted.



However, NICCY is disappointed to note that there is no reference to a 'Life Stage' approach in the draft Strategy.

NICCY is very supportive of prevention and early intervention to tackle child poverty, although we are not clear why this would require a 'gradual shift'. NICCY is also very supportive of an evidence based approach, but is concerned that there is little indication that the Strategy has been developed through the analysis of available evidence.

It is also important to recognise the family context for children and that poor children live in poor households. In many cases actions to lift children out of poverty will be focussed on the adults in the family - for example, support to return to work, family support. However the strategy must concentrate on the children experiencing poverty. This was a recommendation NICCY made at the pre-consultation workshop.

## **5.5 Priority Action Areas**

NICCY is generally supportive of the comprehensive list of Priority Action Areas listed in the table on pages 11-14. There appears to be some dissonance between this list and the paragraph following the table which states that all the issues cannot be targeted at once and a smaller number of priority issues will be identified on which to focus efforts first. It is not clear why the draft Strategy provides such a long list of action areas and doesn't provide any indication of the few that will be initially prioritised. NICCY would also have expected the delivery plan to be included in the Child Poverty Strategy.

NICCY recommends that further consultation is undertaken in relation to the prioritisation of Priority Action Areas.

NICCY welcomes the recognition that there is a need for additionality and renewed effort to tackle the complex issues surrounding child poverty. We had been concerned at recent statements that seemed to indicate that the Strategy would mostly be a collation of actions already underway. What is clear is that it will not be possible to deliver on the ambitious targets to reduce child poverty without significant, new, resourced actions. 'More of the same' will not deliver on these targets. The Executive will need to demonstrate strong political commitment to tackling child poverty.



NICCY suggests that education be identified as one of the priority areas, and that the Executive explores the potential for schools to become 'poverty free zones'.

In addition to the actions contained in the table, it will be essential to include a number of actions relating to structural issues and ensuring a joined up approach. The Inquiry into Child Poverty conducted by the Committee for First Minister and Deputy First Minister provided a number of recommendations in relation to ensuring Government structures deliver effectively for children experiencing poverty and a number of these should be reflected in the priority action areas for the Strategy.

### **5.6 Monitoring**

NICCY welcomes the development of a monitoring framework but regrets that this will not be completed in time to be included in the Child Poverty Strategy.

It will be important to include either the Child Poverty Commission or – if this is not established – NICCY in the development of the monitoring framework and in the governance and delivery framework. The framework should also indicate the role children and young people will play in advising on delivery of the Strategy and scrutiny of outcomes.

### **5.7 The Child Poverty Act and targets**

It is curious that the first detailed reference to the Child Poverty Act and targets comes so late in the draft Strategy.

It would be helpful if the section on targets were to include tables or graphs indicating the changes in child poverty rates over time, and plotting ahead the trajectory required for the targets to be met. This would allow interim targets to be set for the duration of this first Child Poverty Strategy.

While the Act requires the Executive to demonstrate that it is contributing to the reduction of child poverty, it doesn't set specific Northern Ireland targets. However, given the population of Northern Ireland compared to the rest of the UK it is clear that UK targets could be met while every child in Northern Ireland is living in poverty. The Northern Ireland Executive has set targets for the reduction of child poverty in Northern Ireland in the Programme for Government and in Lifetime Opportunities.

NICCY recommends that a comprehensive list of child poverty targets be used to report on implementation of the Strategy and the Programme for Government. These should include Northern Ireland specific targets.



NICCY is concerned that OFMDFM is referring to estimated figures for child poverty back to 1998/9 without indicating that these are estimates. NICCY is deeply concerned at the only very brief reference to Persistent Poverty measures. Save the Children's 2008 report into persistent child poverty found that 21% of children in Northern Ireland were living in poverty compared to only 8% in GB.<sup>9</sup> We are also concerned at the 'uncertainty' around whether the UK-wide Understanding Society Longitudinal Survey will have a large enough sample size to provide separate robust persistent poverty estimates for Northern Ireland.

NICCY strongly urges the Executive to ensure that the sample size for the Understanding Society Longitudinal Survey is boosted if necessary to allow for robust persistent poverty figures for Northern Ireland.

### **5.8 Resourcing the strategy**

It is with disappointment that NICCY notes that there is no budget associated with the Strategy. It will not be possible to deliver this Strategy without resources allocated. Indeed, many of the budget cuts made by Westminster government and the devolved Executive will disproportionately affect poor children.

There needs to be more recognition of the role that government policies and budget decisions have played in creating child poverty. Moreover, the Executive should make the reduction of child poverty a key priority and include a budget for the implementation of the Strategy. It should also recognise that considerable savings can be gleaned from early investment.

### **5.9 Other comments**

Despite assuring the OFMDFM Committee that the Strategy would draw from the recommendations of the Inquiry into Child Poverty there is little evidence of this in the draft document. In our advice to the Department as part of the Pre-Consultation phase, NICCY also drew attention to the EU Recommendation on Child Poverty which provided a very coherent set of actions for EU member states to tackle child poverty.

NICCY suggests that the Department reviews again the recommendations from the Child Poverty Inquiry and the EU Recommendation on child poverty and incorporates relevant actions into the Strategy. These recommendations are attached at Annex 3 and 4.

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<sup>9</sup> Montieth, M., Lloyd, K., and McKee, P., Persistent Child Poverty in Northern Ireland, (Belfast: Save the Children).



## **6.0 Conclusion**

NICCY appreciates the opportunity to respond to the policy proposals. Once the Department has reviewed the large number of responses received, NICCY would welcome a meeting to discuss how matters will be progressed.

To discuss our comments and to arrange a meeting, please contact Alex Tennant, Head of Policy and Research on 0289031 6395 or [alex@niccy.org](mailto:alex@niccy.org).



## Annex 1: Summary of recommendations from Poverty Roundtable

### **Recommendations from Tackling Child Poverty Amongst 16 and 17 Year Olds Workshop 10 February 2010**

#### **Benefits**

- End variation of entitlement because of age, including 16 / 17 year olds having access to working tax credits and the minimum wage of those aged 18 and over
- Address the complexity of entitlements and simplify the process for application and assessment
- Ensure targeted / means tested measures do not exclude those just over the threshold but also in need
- Ensure greater awareness amongst young people of their entitlements

#### **Housing**

- Tackle homelessness
- Resource supported housing
- Provide support to prevent 16/17 year olds from living independently unless necessary

#### **Education**

- Engage young people in education of all kinds and value all skills and abilities
- Address why young people want to leave education at age 16, address the underachievement of the system and the focus on academic achievement
- Ensure respect for young people, ensure pastoral care policies address stigma in education, ensure no tolerance of failure
- Ensure financial support is available and accessible as this affects young peoples choices
- Model existing best practice in schools



**Transitions**

- Provide information and advice, for example, when making decisions about further and higher education and training, to support young people to identify their skills and abilities
- Provide above where young people will access this, for example, on the web, through youth provision
- Address delays where young people waiting for decisions, for housing etc

**Care experienced young people**

- Address inconsistencies across different health trusts, for example, different budgets, priorities, messages from social workers

**Mental health**

- Ensure consistent provision and support, for example, across both urban and rural areas
- Ensure services are young person friendly and tailored to their needs
- Establish a young people's mental health unit
- Increase awareness of mental health issues amongst teachers and youth workers

**Prevention**

- Ensure a holistic approach across all ages and all areas, for example, models of extended schools, interagency family support

**Government**

- Commit to providing long term support
- Address issues that cut across devolved and reserved powers and the border
- Ensure strong cross departmental approach, working and cooperation
- Establish an interdepartmental group for 16 and 17 year olds
- Ensure the child poverty action plan draws on a strong evidence base (statistics and research)
- Use innovative approaches and methods and develop economic arguments of long term costs if action is not taken
- Involve young people in the child poverty strategy
- Ensure fair representation on the Youth Assembly which has huge potential



**Other**

- The voluntary sector must be more joined up and have a strong voice on this difficult issue in order to engage government and politicians
- The voluntary sector should have a comprehensive campaigning strategy and make use of economic arguments

Annex 2: Selection of comments to government on child poverty from the Make it Right campaign

**'What do you want to say to people in government who can do something about child poverty?'**

"Raise money for them. Give food to them."

"Although Jenna is training to become a plumber she is still only 17 – perhaps she could get money/benefits as she is making an effort to train and get a professional skill. Perhaps Jenna could receive extra payments during extremely cold weather to help pay for heating."

"They should be going back to basics and seeing how to prevent this from children at a young age e.g. targeting teachers, doctors, professionals to become aware of and tackle the problem."

"Persuade parents to work by providing school transport etc. To persuade them to provide appropriate support to children and young people in poverty. Put themselves in the mind/situation of the child/family."

"Open your eyes and help change children living in poverty. We aren't a third world country there is no excuse for it."

"Due to problems in economy, there is a rise in poverty, so actions need to be taken by researching the area."

"DO SOMETHING! Raise the minimum wage for this age bracket. Ensure young people this age know how and where to get help. Ensure benefits are available to them. Jenna is making an effort – she shouldn't be punished for it!"

"Help is needed. Views and individuals situations need to be given great consideration."



"More action and support is vital for children and young people who are within child poverty as it is greatly increasing within the last few years due to the recession; by ignoring the children in these situations we are allowing them to suffer physically and emotionally."

"It is harder for a child to admit they are living in poverty, so twice the work needs to be done to check they are OK. They need more encouragement to speak up so access to information and platforms for communication at the level and comfort of the child is paramount."

"Poverty affects all aspects of a child's life and therefore is very important. It can also lead to criminality and health and education problems which will eventually cost the public sector more in the long run. The government should therefore not complain later when they do not look after someone early in life."

"It is tragic the troubles young people have to face. Living in poverty they cannot enjoy their childhood instead having to take on adult worries and responsibilities. These children should have access to what they need to live a healthy life free from illness caused by poverty both physically and mentally. Poverty should be ended!"

"No call for it at all. We have a welfare state that can provide money for those on disability allowance etc. and this should be addressed at child level."

"Provide a lot more seen work in the community."

"More must be done."

"Help!"

"Aim to eliminate. Simple strategies."

"Get the finger out!"

"Actions speak louder than words."

"Why aren't you doing anything to help when you have the power to? This should be a priority."

"Give more support. Better resources."

"Use your position to help children living in poverty as best as possible. Make a difference."



## Annex 3: Recommendations from COFMDFM Inquiry into Child Poverty

June 2008

### **Definition and Measurement of Child Poverty**

1. We recommend that the Executive should, when defining, measuring and tackling child poverty, take account of the importance of ensuring that children and young people retain an expectation of achievement.
2. We support the decision by OFMDFM to adopt the 3-tiered approach to the measurement of child poverty used by the UK Government. In addition to measuring both absolute and relative low income, the Executive must ensure that material deprivation is also measured.
3. We recommend that OFMDFM and the Executive carefully consider the extent and distribution of poverty, including rural poverty, across Northern Ireland when developing their approach to tackling child poverty and when planning new investments and services. The Committee also recognises the importance of identifying and tackling smaller areas of deprivation, which are often masked by more affluent surrounding districts. It is vital that the Executive's strategies and plans are based on a robust assessment of objective need.
4. We commend the Executive for adopting its target to work towards the elimination of severe child poverty. However, if this is to represent a meaningful commitment and not an aspiration, the Executive must establish, in advance of reviewing the Programme for Government, a baseline and system of measurement for the new severe poverty target.

### **Strategies to Tackle Child Poverty in Northern Ireland**

5. We recommend that OFMDFM should move quickly to adopt the Lifetime Opportunities Strategy as the framework for its work to tackle poverty and social exclusion. Critically, this will allow OFMDFM to focus on remedying some of the deficiencies within the Strategy through the development of a properly resourced medium-term action plan, which includes SMART intermediate objectives and targets capable of delivering the Executive's child poverty targets.



6. Following extensive deliberations, and taking particular account of the fact that the target to reduce child poverty by 50% by 2010 is a UK-wide target, the Committee has decided, on balance, to support the retention of the current target and to recommend that it be reviewed following publication of the 2006/2007 data later this year.

7. We accept that the Executive's Anti-Poverty Strategy will have a critical role in filling many of the gaps in the current policy framework, but remain of the view that the Programme for Government and related PSAs need to be significantly strengthened if they are to ensure that resources and actions are effectively directed by departments towards the elimination of child poverty. As an immediate step, the Committee recommends that the First Minister and deputy First Minister:

- Establish target dates for the adoption of the Lifetime Opportunities Strategy and for the publication of a 3-5 year regional anti-poverty and social exclusion implementation plan, which should include the supporting objectives, targets and programmes for the delivery of the PSA targets to eliminate child poverty and severe child poverty.
- Re-establish the Ministerially led Poverty and Social Inclusion Stakeholder Forum.
- Establish a target date for the adoption of a regional Children and Young People's Action Plan.

8. We recommend that that during the first review of the Programme for Government specific targets should be included in relation to:

- the level of additional investment across government in early years services over the Budget period;
- the number of additional places to be provided within Sure Start during the period covered by the Programme for Government;
- the number of high quality affordable childcare places to be created during this Programme for Government, including the % of such places that are to be created in areas of deprivation;
- a timeframe for implementation of recommendations arising from the taskforce established by the Minister for Social Development to reduce the impact of rising fuel costs on families on low income;



- the establishment of a pilot project in Northern Ireland which will reassure long term recipients of benefits that if they enter full-time work they will have an in work income better than they receive from their out of work benefits;
- the completion of a review, involving other relevant departments, to consider the issues addressed by the package for disabled children's services in England, in relation to the provision of short breaks, accessible childcare, transition support and parents' fora;
- the development of a cross-departmental Benefit Uptake Strategy.

9. We recommend that OFMDFM should insist on the inclusion within Programme for Government Delivery Agreements of a short-list of the changes to be introduced by each department to contribute to the objective of a shared and better future and that this should include measures which contribute to the reduction in levels of child poverty.

10. We wish to encourage the Committee for Social Development to carefully monitor the delivery of the commitment in the Investment Strategy to deliver 10,000 new social and affordable houses by 2013.

11. We consider the development of improved spatial information to be key to the Investment Strategy's contribution to tackling weaknesses in infrastructure and to the Strategy's capacity to take account of objective need. The Committee will therefore expect to receive an update on the progress made by the Strategic Investment Board, and departments, to develop such information within Investment Delivery Plans, during evidence sessions to follow-up the Committee's report on the Programme for Government and Investment Strategy.

12. We recognise the particular role of the Committee for Finance and Personnel in monitoring compliance with the guidance on the role of procurement in contributing to the socio-economic and sustainability objectives of the Executive and recommend that all statutory committees examine their department's compliance with the guidance when scrutinising Investment Delivery Plans.

13. The Executive must quickly distance itself from the approach of direct rule Ministers to the production of ambitious strategy documents which are then supported by unambitious action plans, which act more as a statement of existing departmental action than as a real plan for change. The Lifetime Opportunities implementation plan must focus on identifying the intermediate, 3-year outcomes that need to be achieved to deliver each of the long-term



poverty reduction and social exclusion targets, detail the additional or changed outputs that are planned to achieve such outcomes, explain the timeframe for delivery and how the outputs are to be resourced.

14. We call on OFMDFM to ensure that the inclusion of narrative and descriptions of existing departmental activity is minimised within Implementation Plans supporting the Lifetime Opportunities Strategy.

15. We welcome the recognition of tackling poverty and disadvantage within the public expenditure planning process and ask OFMDFM and the Department of Finance and Personnel to ensure that this remains a feature in future Budget rounds.

16. We welcome the proposal to establish a sub-group of the Executive to identify the key actions that are required to deliver on the commitments in the Lifetime Opportunities Strategy. However, it is likely that this process will take some months and the Committee remains of the view that OFMDFM should have a role in challenging departmental Delivery Agreements to ensure the relevance and robustness of departmental targets and actions designed to contribute to the cross-cutting theme of a shared and better future.

17. We recommend that OFMDFM and the Department of Finance and Personnel should consider, following consultation with this Committee and the Committee for Finance and Personnel, the introduction of a system of financial incentives and penalties in relation to the delivery of cross-departmental priorities, such as child poverty.

18. We recommend that, in addition to the introduction of new performance management arrangements for the Programme for Government and the Lifetime Opportunities Strategy, OFMDFM should establish an independent panel of experts to report to the First Minister and deputy First Minister on the impact of the Programme for Government, Budget and Investment Strategy and associated delivery plans, on families in poverty or at risk of poverty.

19. We wish to encourage other statutory committees, as part of their work to scrutinise the Programme for Government, Budget and Investment Strategy, to challenge departments to identify the principal measures being introduced to reduce poverty and to set out how these measures are being resourced.

20. We wish to encourage leaders within local government, OFMDFM and the Department of the Environment to take account of the potential role of local government in tackling child poverty when developing new systems for community planning and during the development of agreements on funding and priorities between central and local government.



## **Policies to Increase Income**

21. We recommend that, following a review of initial benefit uptake programmes, consideration should be given by the Department for Social Development to the establishment of longer-term benefit uptake contracts and the adoption of alternative methods to try to contact hard to reach families living in poverty.

22. We recommend that the Department for Social Development brings forward legislative proposals which would enable information to be shared with other government agencies to enable more effective approaches to be developed to encourage benefit uptake.

23. We recommend that, as a first major initiative in seeking to eliminate severe poverty, the Executive should commit to the development of a cross-departmental Benefit Uptake Strategy.

24. We consider that, given the similar challenges faced in seeking to reduce child poverty, the Executive should seek to ensure that policy on poverty reduction continues to be a matter for co-operation and information sharing on both a North/South and East/West basis.

25. The Committee calls on Ministers to lobby the UK Government for the reopening of an office dealing with tax credits in Northern Ireland and for improvements to verification procedures and the administration of the tax credit system.

## **Tackling Rising Costs and Financial Exclusion**

26. The impact of fuel bills that are quite literally rising by the week is so significant that we believe OFMDFM, and indeed the wider Executive, must develop a specific plan of action to deal with the issue of rising costs for people on low income.

27. We urge the Minister for Social Development to ensure that the Fuel Poverty Taskforce considers all practical options, including options for additional payments or special tariffs for vulnerable groups. The Committee believes that in the current climate all options must be considered.

28. The Fuel Poverty Taskforce should consider how, in addition to potential investments by the public sector to increase levels of energy efficiency, the private sector, including the regulated utilities and major fuel companies, could more effectively contribute to minimising fuel costs for people on low income. The powers of the regulator to incentivise and enforce such an approach should also be considered. At a more local level, policies relating to the fuel choices of



low income families may need to be reviewed and serious consideration should be given to how people on low income could be assisted to minimise costs though the creation of cooperatives, thereby enabling the bulk buying of fuel at a reduced price.

29. We recommend that the Executive prioritises the issue of high fuel costs during monitoring rounds and looks creatively at other options that could be used to finance the recommendations that emerge from the Fuel Poverty Taskforce.

30. The Committee asks the relevant departments and committees with responsibility for rates and water charges to ensure that, in developing measures to protect people on low income from further hardship, proper account is taken of the reduced incomes available to many vulnerable groups.

31. We recommend that within the Lifetime Opportunities Implementation Plan a new objective should be included to seek to minimise the impact of rising costs on low income households. As part of this objective, specific consideration should be given to the development of measures that minimise the cost to families on low income of government services. The principles of free education and free health care at the point of delivery must be at the heart of proposals to minimise the cost of services to families on low income.

32. We welcome the recognition by OFMDFM of the role of financial inclusion in tackling poverty and would wish to see this reflected in the Lifetime Opportunities Implementation Plan. We are aware that the Committee for Enterprise, Trade and Investment has launched an inquiry on credit unions and recommend that the Committee investigates whether the direct engagement of credit unions, in the manner employed by the Money Advice and Budgeting Service in the Republic of Ireland, would help to improve the impact of the debt advice service in Northern Ireland.

33. We recommend that the Consumer Council be asked to work with NIHE, the Department for Social Development and insurance companies to investigate low-cost house insurance options, which take account of the levels of home contents insurance required by families on low income.

### **Promoting Employment**

34. We call on OFMDFM to initiate a review, involving other relevant departments, to consider the issues addressed by the package for disabled children's services in England in relation to the provision of short breaks, accessible childcare, transition support and parents' fora and, based on the outcome of the review, to make recommendations to the Executive on the



development of a resourced programme of action to deliver equivalent improvements in Northern Ireland.

35. We call on OFMDFM, as a matter of priority, to resolve the dispute between the Department of Education and the Department of Health, Social Services and Public Safety over school aged childcare by assigning lead responsibility for childcare policy to the most appropriate department.

36. We call on Executive Ministers to ensure that before introducing welfare reform programmes which have been developed in other parts of the UK, careful consideration is given to their implementation in Northern Ireland, and, in particular, we recommend that an evaluation is carried out of whether necessary support services, such as childcare, are in place prior to their implementation.

37. We recommend that the Executive should set a date for the development of a long-term, properly resourced Childcare Strategy and take immediate action to resolve the funding crisis for school aged childcare. The Committee recommends that the Strategy should include specific targets to:

- increase the level of good quality, affordable childcare in areas of disadvantage;
- improve the level of appropriate, affordable childcare provision for children with a disability;
- improve access to affordable childcare in rural areas;
- reduce the length of time that it takes to become registered as a childminder;
- reverse the decline in registered childminders that is being experienced in some parts of Northern Ireland;
- enhance the training and development of staff working in early years settings.

38. We recommend that consideration be given to introducing a statutory duty to require sufficient childcare provision to meet the needs of the community in general and in particular those families on lower incomes and those with disabled children.

39. We recommend that specific targets for improving childcare provision in rural areas be included in the Childcare Strategy.



40. We recommend that making work pay should be a specific objective within the Lifetime Opportunities Implementation Plan and that the Department for Social Development, with the support of OFMDFM, should work with departments in the UK on the development of a pilot “Better off in Work” initiative in Northern Ireland.

### **Measures to Tackle Long-term Disadvantage**

41. The Committee considers that more attention needs to be paid to identifying and targeting the population groups at most risk of poor educational or health outcomes with specific, evidence-based strategies that will deliver real improvements for such groups.

42. It is crucial that the Early Years Strategy being led by the Department for Education is properly resourced and is quickly followed by an implementation plan containing SMART targets. We recommend that the Early Years Strategy should include specific targets on:

- the level of additional investment across government in early years services over the Budget period;
- the number of additional places to be provided within Sure Start during the period covered by the Programme for Government;
- the additional support to be made available to help identify the additional educational and support needs of young children.

43. We recommend that OFMDFM and relevant departments and agencies, including, in particular, the Department of Health, Social Services and Public Safety and the Department of Education, review and update legislation underpinning children’s services planning with a view to:

- extending the duty to develop children and young people’s plans to at least include the Regional Health and Education Authorities;
- linking children’s services plans more directly with the outcomes of the Children’s Strategy, whilst retaining specific recognition in the legislation for children in need;
- strengthen the legislation, or statutory guidance, so that relevant organisations are required to co-operate, rather than participate, in children’s service planning and delivery.



## **Cross-Cutting Approaches**

44. The Committee is of the view that:

(a) Further consideration should be given to how the process of Equality Impact Assessment could better inform policies in relation to their impact on groups at high risk of poverty; and

(b) The Anti-Poverty Unit in OFMDFM, with the support of the Department of Finance and Personnel, should have a role in challenging and reporting on whether key policies have taken adequate account of their impact on groups in poverty or at risk of poverty.

45. We recommend that OFMDFM should consider how to use the outcome of its work on Promoting Social Inclusion to improve understanding among policy makers and service providers of the groups which are most at risk of poverty and social exclusion and the steps that will have most impact in removing such groups from poverty and exclusion.

46. We recommend that the key recommendations from the Promoting Social Inclusion reports are integrated into the planning and implementation processes for the Programme for Government and Lifetime Opportunities Strategy.

47. We wish to encourage the Department of Agriculture and Rural Development, in consultation with the Committee for Agriculture and Rural Development, to consider carefully how to utilise the funding package on rural poverty and social exclusion to maximise its impact on rural child poverty over the long-term.



## Annex 4: Call for an EU Recommendation on Child Poverty and Child Well-being June 2010: Summary of Policy Recommendations

September 2010

### **1. Access to Adequate Resources**

#### 1.1. Income and Benefits

- Countries which spend most on social benefits (excluding pensions) tend to have lowest child poverty levels. Government should improve child benefits as an expression of intergenerational solidarity, recognition of the inherent value of childhood and an investment in Europe's future.
- Universal child benefits are the most effective way of providing income support to families with children. They should be received automatically and coupled with targeted benefits for those most in need.
- Child sensitive income support also includes benefits targeted directly at children such as government provided child-trust funds, free books and education materials, free school meals, free access to leisure and cultural activities etc.

#### 1.2. Reconciliation of Work and Family Life

- Quality work for parents is crucial. Flexible working arrangements should be provided to enable parents to balance work and family commitments. Work arrangements should accommodate increasingly diverse household compositions.
- Leave arrangements for parents should be paid, universally accessible and offer flexibility to allow parents to respond best to their children's needs over the course of their childhood. Leave arrangements should respect and support increasingly diverse household compositions.
- Parents should have access to affordable, accessible and high quality services to support them and their children. Services should accommodate the increasingly diverse work patterns of parents.



## **2. Access to Services and Opportunities**

### 2.1 Early Childhood

- Early childhood should be recognized as a crucial stage in children's education, development and social integration, requiring public investment in services that are accessible to all, regardless of parent's labour market situation.
- Clear quality criteria should be set for early childhood services including professional qualifications, recognition, training, staff/child ratio, educational philosophy and values.

### 2.2 Education

- Every child (including Roma children and other children at risk) should have access to quality inclusive education for all children that promotes child well-being and the emotional, social and physical development of the child in addition to academic achievement.
- The role of education in preventing and breaking the poverty cycle should be strengthened by removing all financial barriers to education, ensuring equal opportunities, and by providing necessary additional support to compensate for any disadvantage in the home and community that might make it difficult for children to fully learn and develop.
- Efforts should be strengthened to ensure children complete compulsory education and to prevent early school leaving by encouraging parental support for school completion, and by providing appropriate pathways for continued education and/or vocational skills, reflecting the diversity of children's learning patterns and aspirations.

### 2.3 Health Care

- Children should be specifically targeted within broader efforts to reduce health inequalities and to achieve universal access to health care for poor and socially excluded groups, including by ensuring universal coverage of health insurance.
- Recognising that childhood is a crucial period for children's physical, mental and emotional development, all children should be assured access to health promotion and prevention programmes.



- Recognising the higher prevalence of mental health problems among socially deprived groups and the growing number of children who suffer from mental health problems, mental health services should be expanded and made available to more children requiring support.

## 2.4 Housing and Environment

- Consideration of children's best interest should be integrated into city and territorial planning. Particular attention should be given to healthy and safe environments for children in the home and in their neighbourhood that respect children's right to play and study.
- Ensure affordable and quality housing for families with children which provide long-term solutions and avoid unnecessary moves and school changes.

## 2.5 Child Protection and Social Services

- Child protection and social services should be strengthened to provide early intervention and prevention services that support and empower families most at-risk and avoid escalation of problems that may push children further into poverty and risky situations.
- Ensure that children are not removed from their families due to families' lack of resources to care for children. Instead families must be supported to care for their children themselves, provided this is in the best interest of the child and efforts should be made to facilitate the de-institutionalisation of children.
- Promote the inclusion in society of all children who are not living in families (street children, those living in institutional care, unaccompanied minors, those living in temporary accommodation) by ensuring they are given appropriate quality support and care and have access to mainstream services including education, health, etc.



### 3. Children's Participation

#### 3.1 Children's Right to be Heard

- Governments should adopt necessary laws and policies that recognize the child's right to be heard and participate in all decisions that affect them, and provide specific opportunities for participation in policy making.
- Ensure policies addressed at tackling child poverty and social exclusion reflect the views and suggestions of children themselves, including those most marginalized.
- Ensure all those working with and for children understand the impact of poverty and social exclusion and the need to listen and to take account of the views of children.

#### 3.2 Participation of children in social, recreational, cultural, sporting and civic activities

- Recognising the importance of culture, youth work and sports activities in the inclusion and well-being of children from disadvantaged backgrounds, specific targeted actions should be supported to reach out to these groups.
- Schools should promote more and better quality after- and outside school activities that give *all* children to access cultural, recreational, sporting activities that build self-esteem, reduce frustration and support overall learning and well-being.

