



northern ireland commissioner
for children and young people

Response to the consultation on:

Making it r wrld 2

**A Draft Strategy for Children and
Young People in Northern Ireland**

1. Statutory Responsibility

The Northern Ireland Commissioner for children and young people (NICCY) was established in October 2003. The principal aim of the NICCY is to “safeguard and promote the rights and best interests of children and young people”¹.

Under the terms of its enabling legislation, the Commissioner for children and young people (Northern Ireland) Order 2003, Article 7 requires the office of the Commissioner to review the “adequacy and effectiveness of services and the law relating to children and young people” and to advise Ministers and/or the Secretary of State accordingly.

The draft strategy for children and young people clearly falls within our duties, outlined at Article 7 (2) (3) & (4) of the Commissioner for children and young people (Northern Ireland) Order 2003.

2. Background

NICCY have corresponded with and met officials from the Office of the First Minister and Deputy First Minister to discuss earlier versions of the draft strategy for children and young people.

We have keenly awaited the draft strategy for children and young people as a fundamental commitment by Government to place the rights and best interests of children and young people at the heart of policy and delivery of services and to act as an implementation mechanism for the United Nations Convention on the Rights of the Child (CRC). As a statutory body we are charged with a requirement to promote the concept of children’s rights and to have due regard to the CRC.

We welcome the publication of the draft strategy for children and young people as fulfilment of a long-awaited promise to the children and young people of Northern Ireland. We appreciate how much effort and thought that has gone into consideration of the views of children and young people in the development of this strategy. Both the Advisory Forum and the Future Search events were welcome developments at the heart of Government and provide a useful benchmark for other departments of Government in how to involve Children and young people in complex issues of policy.

We have also met with the Parliamentary Under-Secretary of State with responsibility for the Priorities and Budget 2005 – 2008. As well as advocating on behalf of children and young people with regard to our concerns about the wider impact of the Priorities and Budget 2005 – 2008 we have shared our concerns

¹Article 6 (1) of the Commissioner for Children and Young People (Northern Ireland) Order 2003

about the lack of dedicated funding available to the Office of the First Minister and Deputy First Minister for the implementation and oversight of this strategy.

In late 2003 we commissioned Queen's University to undertake a large scale research project² comparing Northern Ireland to the standards of the CRC. In general terms, the research demonstrates a significant disparity between the minimum standards outlined in the convention and the manner in which the rights of children and young people are currently being met in Northern Ireland. We realise that the development of r wrld 2 coincided with the period over which this research was undertaken and concluded. This is unfortunate because we believe that r wrld 2 would be much more focussed and holistic if it had taken into consideration the findings of our research.

We recommend that r wrld 2 is reviewed against the findings of the NICCY research and any gaps that are identified are included in the final strategy.

We believe that, in particular, the chapter in our research, on issues of general implementation of the CRC, would add considerable weight to the strategy. We believe if it were to be used as a benchmark for the activities and objectives of the various Government departments which will contribute to the fulfilment of the strategy it would greatly strengthen its impact on children and young people.

Minister of State Spellar, in his foreword to r wrld 2, reaffirms the Government's commitment of "...ensuring that children and young people's rights and needs are co-ordinated, monitored and promoted within Government."

We wholeheartedly support the Minister in this vision and we welcome this commitment, coupled to the extensive work that has gone into hearing the voices of children and young people in the development of this strategy.

² Children's Rights in Northern Ireland 2004 Queen's University Belfast.

3. Why we need a strategy for children and young people

Like other statutory bodies created since the Good Friday Agreement the NICCY considers the all embracing vision outlined in the agreement, "...of a peaceful, inclusive, prosperous, stable and fair society..." as fundamental to our work. We welcome the reference in r wrld 2 to the agreement as a foundation to building a society which can realise the Northern Ireland Executive's vision when they sought to ensure that children and young people's:

- *Rights are recognised and promoted;*
- *Contribution is encouraged and enabled; and*
- *Best interests are safeguarded.*

R wrld 2 sets out 4 main reasons why Northern Ireland needs a strategy for children and young people;

1. To give children and young people a higher priority
2. To address the gaps in information about children and young people
3. To enable organisations to work together
4. To help realise the rights contained in the UNCRC

NICCY fully supports these drivers for change. We are, however seriously concerned at the suggestion, included in the sub-text of item 4 above, that "Not all of those principles and aspirations will be immediately realisable but the strategy will provide a firm programme for progress and will help to advance the rights and best interests of children and young people."

The strategy sets out a vision for the future and a series of objectives and measures as to how to get there. To signal that the strategy, over a 10 year period, cannot be resolutely committed to the achievement of all the rights and principles contained in the UNCRC is, we believe, fundamentally at odds with the Northern Ireland Executive's vision, as stated above.

We strongly recommend to OFMDFM that the strategy fully implements the CRC in law, policy and service delivery and Government resolutely commits to its full implementation within the lifetime of this strategy.

NICCY also considers the linkage here, of responsibilities to the rights of children and young people as outlined in the CRC, to be inappropriate. In our draft Corporate Plan we, too, linked rights and responsibilities in this way. Several respondents to the consultation on our priorities made a very strong argument that the two should not be linked in this way and we are swayed by the evidence they have provided to us. The CRC does not couple rights with responsibilities and we do not believe that this strategy should do so either.

We fully agree that with any promotion of rights there needs to be an awareness of the responsibilities entailed by achieving them. We recognise that “this message will be an important element of any rights-based education programmes for young people.” However we believe it is inappropriate in any section setting out why Northern Ireland needs such a strategy and citing the CRC as a benchmark, to couple responsibilities with rights.

We recommend that all references to coupling rights to responsibilities (outside of a context of educating children and young people about their rights) should be removed.

4. What we know about the lives of children and young people

We welcome the investment of time and resources that have been employed by OFMDFM in arriving at this strategy and particularly the direct involvement of children and young people in the development of a strategy to meet their rights and best interests.

We recognize a strong overlap between the conclusions of OFMDFM's work and the results of NICCY's research, and what we have been told in the consultation we have undertaken on the priorities and corporate objectives of NICCY.

They are:

1. Bullying
2. Child Protection
3. Having your say
4. Children with poverty
5. Play and Leisure
6. Special Educational Needs and Autism
7. Children with mental health issues
8. Children and crime
9. Children with disabilities
10. Physical Punishment
11. Road Safety
12. Knowing your rights
13. UNCRC
14. Children and the troubles

5. Vision and Values

We welcome the clear statement of vision which sets the strategy firmly as a vehicle for the achievement of rights for children and young people, as active citizens, free from poverty living in a safe, secure and peaceful society, whose voices are heard and respected.

Whilst r wrld 2's vision and values are laudable we believe that the operational principles do not, nor can they as they are currently framed, achieve the vision or lead to a society where children and young people have dignity as human beings, worthy of respect and who have rights as individuals.

These operating principles clearly indicate the Government is a signatory not only to the CRC but to other related international human rights instruments. However the operating principle that r wrld 2 is "rights-promoting" is seriously weakened by a commitment which seeks to develop policy which will "carry Northern Ireland closer to the principles enshrined in the UNCRC and other international human rights instruments...."

The CRC is a floor, not a ceiling and as such represents a minimum standard. As our research has pointed out many children and young people Northern Ireland are living lives which are very far removed from this minimum standard (the CRC) and their rights are compromised daily. In October 2003 the Government published its Working Paper on the Emerging Strategy (which became r wrld 2) and set the strategy as its 'implementation plan for the Convention'.

The United Nations Committee on the Rights of the Child has consistently urged that:

"Effective protection of children's rights requires a unifying, comprehensive and rights based national strategy rooted in the Convention developed through a process of consultation with children and young people and those living and working with them...."

In Parliament, the Joint Committee on Human Rights has refuted any suggestion by Government that the provisions of the Convention (on the rights of the child) could be viewed as purely aspirational and expressed the belief that 'children will be better protected by incorporation of at least some of the rights, principles and provisions of the Convention into UK law'.

We are therefore very concerned that the principles to which policy makers and service providers should adhere, significantly underplay the role of the CRC. Without this operating principle being fundamentally changed to recognise the need, expressed in the above quotation from the Committee on the Rights of the Child, for r wrld 2 to be firmly rooted in the CRC, we believe it will not achieve the vision to which we all subscribe.

We strongly recommend to OFMDFM that a firm commitment is made in the strategy to fully implement the CRC in law, policy and service delivery.

The Health and Social Services Boards have provided a clear and rights-based approach to planning for children and young people in their Children's Services Plans. We consider their approach, encompassing rights for all children and young people would add significantly to R Wrld 2

We believe the nine rights based objectives developed by the H&SS Boards children's services planning groups should be included in this section of the strategy.

6. Setting the agenda

The scope of r wrld 2 is considerable, across government departments, their agencies and bodies, service delivery processes and partnerships with the community and voluntary sector. The strategy is also a look ahead across ten years of government. The breadth of this exercise brings with it risks about delivery and realisation of the vision from which the strategy comes.

The strategy therefore needs to be SMART ~ Specific; Measurable; Agreed; Realistic and Time bound.

We recognise this is in itself a very complex and demanding task but we believe the success or otherwise of the strategy will rely on how this section is structured. We are also mindful of the commitment given to develop a set of strategic indicators “which will measure progress in relation to delivering these outcomes.”

We are therefore very concerned at the timescale set out for many of the strategic objectives which we consider to be much too long in many instances. We recognise the difficulty the development of a long term strategy brings and understand that it should not be “front – loaded” with objectives. We are however impatient for change and we consider the timescales will be meaningless to many children and young people, representing as it does, almost half their lifetime.

We recommend that OFMDFM in conjunction with other departments of Government reassess the timescales set for many objectives and actions.

We also welcome the focus on the UNCRC and as we have stated above, we believe the strategy should more closely follow the primacy of a rights based approach in this section. The remaining four/five areas; Equality; Participation; Provision; Protection and Poverty are all derived from the CRC and we believe a focus on the convention will lead to a much more focussed and achievable approach to the agenda.

We strongly recommend to OFMDFM that a firm commitment is made in the strategy to fully implement the CRC in law, policy and service delivery and that this informs the agenda for R Wrld 2.

7. Rights and Equality

We welcome the focus of this section and its objectives.

We wholly support the thrust of raising awareness across Government on the rights of children and young people and the UNCRC, the development of training strategies to support this objective and a commitment to proof new policies and legislation in order to assess the impact on the rights and best interests of children and young people.

In this context OFMDFM is both a driver for change and a service delivery mechanism, particularly regarding the development of legislation and policy and through its NDPB's service delivery, for example the NICCY and the Equality Commission for Northern Ireland.

There is a clear need to develop existing structures, particularly with regard to the promotion of equality, in order that barriers to children and young people's inclusion are addressed and that the concept of their rights are embedded in government thinking, policy and actions.

We recommend the development of a formalised structure which requires Government departments to assess the impact of policy and legislation on the rights and best interests of children and young people and for a mechanism to be put in place to monitor this process.

Timescales for both the development of a training needs analysis and on the delivery of training to staff with regard to the CRC cannot be held up for 3 to 10 years. We recommend that work commence on these processes immediately and that OFMDFM take the lead department responsibility on both.

Regarding the development and implementation of an awareness-raising campaign to alert children and young people to their rights we would wish to note that an increase in the number of complaints to NICCY may come with a raised level of awareness amongst children and young people. This will, we believe reflect the poor level of awareness there is at present and should not be considered indicative of a rise in breaches of rights.

We recommend to OFMDFM that, perhaps through NISRA, measures are developed to assess the impact of awareness campaigns to be included in OFMDFM's report. Training will also need to be differentiated according to the age and/or group of children and young people targeted.

We would also wish to point out the clear links between developments on the Race Equality Strategy and poverty especially with regard to Northern Ireland Travellers.

We suggest that there needs to be a clearer link established between the Race Equality Strategy and measures to address Poverty and we would point to our own research as a starting point in this regard.

R wrld 2 signals that a biennial report will be made by CYPUP.

We recommend that this report should be produced annually.

We recognise the efforts that have been made to develop a Bill of Rights for Northern Ireland. This is a contentious and contested area in Northern Ireland but we believe there is a growing recognition of the need for and benefits of a Bill of Rights.

We recommend that the strategy includes an objective and a number of actions which seeks to include full implementation of the CRC in a Bill of Rights for Northern Ireland

8. Participation

Consistent across both our research and the results from the consultation on our draft priorities, children and young people have emphasised the need to be heard.

We wholeheartedly support the strategy's objectives to ensure participation.

We believe there needs to be a fundamental shift in attitude and behaviour if children and young people are to be active participants in policy making and in decisions that affect their lives. In this regard we believe there needs to be a clear distinction made between the active participation of children and young people and of the process of consultation. Often we have found the two terms to be used interchangeably and we believe this is indicative of an attitude that 'ticks a box' rather than making the process of involving children and young people in decision making real.

With regard to the process of consultation there does appear to NICCY to be a fundamental unwillingness in some departments and agencies to consult directly with children and young people on issues that affect them. We recognise that we, and other agencies and NDPBs, have a role to play in sharing best practice in this regard and in shaping guidance and policy to assist this process. Whilst we recognise that the Equality Commission, as gatekeepers of the S75 responsibilities on Public Bodies, are required to lead on this work, we would be happy to assist them in providing guidance and examples of best practice.

The mechanism for this process already exists and we need to develop a meaningful and cost-effective mechanism for consulting directly with children and young people.

We recommend that the strategy includes a specific objective to develop, monitor and maintain adequate guidance and practice on how Government departments and their agencies and NDPBs consult directly with children and young people. This should be issued under the umbrella of public bodies' responsibilities to promote equality under S75 of the Northern Ireland Act.

Through our casework and research we have identified a number of key areas where the views and participation of children and young people are not respected or where they are being patchily implemented.

We believe there needs to be a review of how the mechanisms included in the Children Order are being operated at the coal face and a re-affirmation of the concept of the participation of children and young people in this key area.

The power to appoint a guardian ad litem for any child in private family law proceedings is not possible in the family proceedings courts (Family Proceedings Rules, 1996).

In divorce proceedings, the requirement for a social services report in all divorce cases was removed by the Children (NI) Order 1995 (Art 44, Sch 9) and the court is required to determine whether it should exercise any powers under the Children (NI) Order 1995 on the basis of the Statement of Arrangements for Children lodged by the parties. The child's views are not routinely sought as part of this process.

In relation to children affected by domestic violence, article 36 of the Family Homes and Domestic Violence (NI) Order 1998 allows for the provision of separate representation of children in circumstances to be specified by the Lord Chancellor in Regulations, but this article of the legislation has not been commenced.

We understand that the issue of separate representation is currently being considered in detail by a sub group of the Children Order Advisory Committee (Fourth Report, 2004).

In addition, we are concerned about the level of provision of representation and advocacy services for children and young people:

- who are looked after
- who have been suspended/excluded from school
- who have special educational needs
- who are receiving services and treatment from mental health providers
- who are in the juvenile justice system

We recommend that the strategy includes a specific objective to review and improve advocacy and representation for children and young people to make a reality of Articles 2, 3 and 12 of the CRC. We will continue to monitor progress on this issue as part of our responsibilities under the Commissioner for Children and Young People (Northern Ireland) Order 2003.

We are very concerned at the level of involvement in decision-making by young people in schools. We recognise that a traditional view of such activity sees young people as passive recipients of services rather than active participants in the life of school.

We recommend that a much higher profile is given to the development of schools councils and school democracy in this strategy. We wish to assist the OFMDFM and DENI to bring about significant developments in the spread of schools councils and in the range of responsibilities they have.

9. Provision

We welcome the extensive remit of this section of the strategy. We believe that much valuable work has been done by the children's services planning processes in operation in the 4 H&SS Board areas (please see Section 5 above).

We also welcome the approach adopted which seeks to focus on the requirements for **all** children and young people and not specific, often arbitrarily determined sub-groups, which we believe can lead to the development of a 'hierarchy of needs'.

We are also concerned at the absence of certain aspects of provision which do not appear, or appear minimally, in the strategy i.e. objectives and actions in relation to:

- Children's and Young persons' Health (including Sexual and reproductive Health)
- Disability
- Alternative Education
- Prevention, including a whole systems review of Child Protection in Northern Ireland
- Children as Carers

We recommend that the strategy's provision section is expanded to take account of these issues

We welcome the actions in relation to family and parenting support. We are however very concerned to see the timescale for these actions to be in the range of 3 to 10 years.

We recommend that the timescale for the delivery of family and parenting policy and legislative developments are shortened and the level and number of associated indicators are revised to provide a much more comprehensive and time bound basis for assessment.

We welcome the commitment made in the strategy to tackle suicide and improve mental health services for children and young people. We have already made our views known about the crisis situation in regard to mental health services. We are aware at efforts being made to improve this situation. However we believe action is required now to address these issues and to fully implement the proposals made by the sub-committee on child and adolescent mental health, part of the Bamford review.

We are also very concerned at the level of forensic mental health services available to the juvenile justice system.

We believe that significant ring-fenced investment needs to be made in child and adolescent mental health services as a matter of urgency.

We are also aware that the strategy sits alongside a number of initiatives in Great Britain ~ particularly ‘Every Child Matters’ and associated developments in the Children Act 2004.

We have already expressed our concern to the DHSSPS at ministerial and official level at the possibility of the Northern Ireland being overtaken with regard to exciting and far-reaching policy and legislative initiatives and associated funding.

We welcome the developments on the ground at both delivery (Trust) and commissioning (Board) level through the Children’s Services Planning approach. This has secured a more focussed and outcome-based process in both planning and delivery of services to children and young people, on a whole child basis.

We strongly recommend a review of developments in Children’s policy in GB to ensure that Northern Ireland achieves the same or better level of protection and services offered to children and young people in England and Wales recognising and building on the excellent work already in place in Children’s Services Planning.

We welcome the commitment to seek additional resources for new and existing youth provision. We welcomed the focussed and innovative draft Youth Work Strategy but we were concerned at the level of funding allocated to this in the Budget 2005 to 2008. We believe that if we do not enhance the levels of provision for children and young people in play and leisure facilities we will continue to witness higher and higher levels of anti-social behaviour, much of which we believe is prompted by young people being unable to access high quality leisure activities and provision. Much exciting work has already been put in place with initiatives such as ‘Unlocking creativity’ and we welcome the focus on peer led initiatives in this regard.

We recommend that additional resources are found for the full implementation of the Youth Work strategy.

NICCY’s response to the draft Budget 2005 to 2008 expressed concerns about the level of resources available for children and young people in Northern Ireland as compared to Great Britain. We have been told that a lack of disaggregated data on expenditure makes a like for like comparison very difficult. We have discussed with the Minister of Finance the possibility of research to address the issue of comparing funding streams available to children in Northern Ireland compared with children in similar circumstances elsewhere in the UK; and also a comparison of per capita spending by Government on children.

The Committee on the rights of the child has consistently called for the UK Government to ensure that appropriate data is made available. Unless this is

done there will continue to be doubts expressed at comparably fewer resources going to services to children and young people in Northern Ireland, where we have higher levels of poverty and a population of children and young people who have arguably greater needs. Our society, which is emerging from conflict, which remains very divided and continues to suffer from the effects of Para-militarism, also has a legitimate claim to greater need because of these circumstances.

We recommend that data collection is developed so that meaningful data can be obtained on both provision and supply with regard to services to children and young people and comparisons made on expenditure levels across the UK in the manner NICCY has discussed with the Minister of Finance.

We recommend that the level of resources for children and young people are increased to more accurately reflect the relatively greater levels of need in Northern Ireland when compared to the rest of GB and such resources are ring-fenced.

10. Poverty

The UNCRC was concerned that there was “unequal enjoyment of economic, social, cultural, civil and political rights for children with disabilities, children from poor families, Irish and Roma Travellers children, asylum and refugee children, children of minority groups, children in the care system, detained children and children aged between 16 and 18 years.”[UNCRC 2002 Para 22].

NICCY’s own research and recently published research from Save the Children Fund (Northern Ireland) shows a high level of absolute and relative poverty in Northern Ireland which continues to be a significant factor in the lives of many children and young people across our society. We are also mindful of the welcome emphasis and, subsequently resources, placed upon this issue by the Chancellor in his ten year plans for the eradication of childhood poverty in Great Britain.

We are concerned at the disjunction between the strategic outcome in r wrld 2 and its associated strategic objective in this regard. We do not believe that the objectives outlined will achieve the outcome desired ~ the eradication of poverty by 2020 as the timeframe for this strategy (2005 to 2015) will cover the bulk of the period between now and the target date.

We recommend that the objectives are developed using the SMART methodology and give commitment and life to the target to eradicate poverty by 2020.

We have already mentioned the cross-over between Poverty and Race. We are concerned at the lack of specific and measurable targets and objectives to specifically address the needs of Traveller children and young people. Many of the most egregious breaches of fundamental rights are experienced by Travellers children and young people.

We are aware of the plans which exist for the development of halting sites and other culturally aware accommodation for this relatively tiny population (less than 1% of the population of Northern Ireland).

We strongly recommend that specific, measurable targets are set in place within the short term in this strategy to address Traveller accommodation issues and that a review of how these measures could be improved takes place over the medium to long term.

11. Delivery

We recognise that the strategy will be accompanied by a more detailed children and young people's action plan. This will provide a more detailed analysis of how the strategy is to be taken forward, which department has responsibility for delivery and within what timescale.

We welcome this approach, and with changes we have suggested to the strategy, we believe the resultant action plan will reflect a much more focussed approach to achieving the vision of this document.

However we are concerned at the structure for how such a process will be taken forward. We applaud how the children and young people's unit in the DfES in London has been able to make significant strides in policy development and in realising some very positive developments for children and young people.

We believe that the approach taken in England has been successful due to the high level commitment made to the needs of children and young people by the creation of a Minister for Children.

As we have earlier stated we welcome this long-awaited strategy. We believe that the strategy will be much more successful if a similar approach is adopted in Northern Ireland and a Minister is appointed for children and young people.

We recognise this may be more difficult in a period when devolution is suspended but we believe that such an approach is imperative if this strategy is to achieve its full potential and children and young people in Northern Ireland are afforded the same level of priority as their counterparts in England.

We strongly recommend the creation of a Minister for Children and Young People in Northern Ireland with cross cutting responsibility for children and young people and the power to oversee and implement the strategy.

We welcome the creation of the Young People's Advisory Forum and the Strategy Review Panel. We believe that without the wholehearted support of children and young people and those in the community and voluntary sectors the strategy will not be an effective mechanism.

In order to maximise the impact of this group's effectiveness we believe that its focus should be on how well the CRC is being implemented. This group could also assist by acting as a review mechanism for an annual report on how the strategy is being progressed.

We recommend that the Young people's advisory panel and the Strategy Review panel use the CRC as a template for assessing the impact of the strategy.

One of the criticisms levelled at some of the participatory and consultative mechanisms developed with children and young people is that they do not hear the views of those considered to be 'hard to reach'.

We recommend that additional and alternative methods are created to consult and involve children and young people in the roll out of the strategy, particularly with regard to those children and young people considered to be "hard to reach".

Making it R World 2 – Communications - Overview

There is a clear imperative that all actions arising from Making it R World 2 must engage the target audiences. As these audiences are diverse the process of engaging these audiences must be undertaken in a planned, strategic and appropriately resourced way.

The consultation document contains many areas that are to be welcomed in terms of a commitment to engage and communicate on the issues and services that affect the lives of children and young people. However, to assist and support the activity described under each Strategic Outcome a communications strategy to support engagement should be adopted to cover the following areas:

DIRECT, FOCUSSED COMMUNICATIONS TO CHILDREN AND YOUNG PEOPLE – within structured (e.g. schools & youth groups) and other settings (via ‘help lines’)

INTERNAL COMMUNICATIONS – Within NI Executive Departments; NDPBs; Next Step Agencies and other Governmental organisations

EXTERNAL COMMUNICATIONS – With community and voluntary organisations, independent organisations etc

MEDIA COMMUNICATIONS – An ongoing strategy to reinforce the key activity within the strategy as opposed to the strategy itself

Without such a detailed, resourced and evaluated communications and engagement strategy the actions under each strategic outcome could reach key audiences in a piecemeal, uncoordinated manner. This will undermine the strategy, especially among young people.

Much of the action listed under communications activity lacks clarity. There are many terms used within the document that are types of communications. There needs to be a common terminology rather than the imprecise use of ‘raise awareness’; ‘information programme’; ‘promotion’; ‘raising profile’ and ‘dissemination’.

In order to make sure the final document provides clarity these should be uniformly described as communications with an explanation of a strategic communications approach and associated tactics for each action. In effect it is proposed to have an additional column within the tables with a heading “How We will communicate this action”.

Addendum One: Additional comments

It should be noted that there are several areas where perhaps greater clarity can be brought to definitions within the draft. Also, the diagram used in Chapter Five is confusing and presents apparently contradictory messages over influences on Children and Young People. For example the mass media being included in the 'outer rim of influence at a time when Big Brother, Pop Idol and similar mass media programmes capture an increasing number of youth audiences. The very terminology 'mass media' belies a greater range of niche publications and broadcast channels which are targeted at young people.

We also ask that it be noted that the strategy places emphasis on access to the internet and mobile telephony among children and young people (statistics page 18). These should be considered as increasingly important channels for communications. Appropriate guidelines should be developed for any Government agency communicating with children and young people via email, web sites, SMS text messages and MMS video/photographic messages.

With reference to the use of the internet by Government, channels such as Online NI should be further developed to include a child and young person specific domain with bespoke content. There are already several examples of such work being carried out nationally and locally (for example www.wimps.org.uk) that use such content and adopt a participative approach.

In the section on child protection the draft actions relating to the media on advertising to children and on raising awareness within the media as to its responsibilities in the way information about children and young people is presented (p 64) represents considerable difficulties in Northern Ireland. Locally produced broadcast material for children and young people is limited. Many children and young people have access to multi-channel television generated outside Northern Ireland. The strategy should seek to ensure that Ofcom's guidelines on broadcasting standards are adhered to and, to assist this, Ofcom should be advised to have a dedicated NI children and young people representative panel.

Representative media organisations in Northern Ireland (NUJ, IFJ, ASA, IPR etc) as should be convened to produce guidelines in a collaborative manner, and directly engaging publishers and broadcasters.

Addendum Two

Comments on the Children and Young Person Making it R World 2 pack from a member of the NICCY Youth Panel

“The shape of the booklet is good and compact and can be carried around easily as it doesn’t take up much space.

The diagram on page 2 called; “Strategy is based on the Whole Child Approach” is too complicated.

I like the layout, the boxes showing the Action and the Evaluation of how the Action is working, are good. However some of these evaluations need to be better explained, as they don’t include the whole evaluation.

As this is a simplified version of the big booklet, it may be good to put in page references to the big booklet so that a person interested in a particular area like ‘Poverty’ can be told where in the big booklet to go to see the full version.

The questions at the bottom are good as they make you think.”