



Never give up on a child. Ever.

ISPCC submission to the Department of Housing, Planning, Community and Local Government on *Ireland 2040 Our Plan: National Planning Framework*

March 2017

1. Summary

The ISPCC is pleased to make this submission to the Department of Housing, Planning, Community and Local Government on Ireland 2040 Our Plan: National Planning Framework. This submission has been addressed within the context of the ISPCC's vision, mission and objective, as defined by its own strategic plan.

The recommendations made are grounded in the ISPCC's experience, data gathered and the principles of the UN Convention on the Rights of the Child.¹

The ISPCC recommends the following:

1. Existing policy frameworks such as Better Outcomes Brighter Futures should be used as a guide in planning for positive outcomes for children.
2. The right to play as an integral element of the health, wellbeing and development of children and young people must be prioritised in all planning.
3. Children must be given the opportunity and be facilitated to provide their views on the National Planning Framework.
4. Appropriate, family-friendly accommodation must be planned for and provided should a family become homeless.
5. The plans outlined in Rebuilding Ireland to increase housing supply and accelerate social housing must be followed through and expanded upon, to look ahead to 2040 to continue to meet the needs of children and families.
6. Prioritise the infrastructure required to enable the provision of specialist interventions, community based primary care services, as well as supporting local services to work together to meet the physical, mental and emotional wellbeing of children.

¹ Full Text on the UNCRC <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

2. Introduction

The ISPCC (Irish Society for the Prevention of Cruelty to Children) is the national child protection charity². It provides a range of child-centred services including childhood support services, family support services and mentoring, all of which are focused on building resilience and coping skills. These services support children and young people and their families to develop their own skills and enable them to deal with challenges and situations in their lives, and to promote their well-being.

The ISPCC provides Childline, Ireland's only 24-hour listening service for children and young people. It is free, confidential and non-judgemental, providing support to children across Ireland.

The ISPCC also actively engages with Government and policy makers to ensure that children's rights and the best interests of children are central to legislation, policy and strategy.

Our Vision

An Ireland where all children are safe, heard, and valued

Our Mission

To make the protection of children everyone's priority

Our Work

We listen, we support, we protect

The population of Ireland under the age of eighteen stands at about one quarter of the total population. As such it is imperative that the voice of the child is central to all policy planning. This far-reaching planning project should be used to deliver lasting change in the provision of services and facilities to children in Ireland, by placing the voice and rights of the child at the heart of policy and practice.

The ISPCC is available to discuss further any of the recommendations made.

² Further information about the ISPCC's services and financial statements can be found in the Annual Report 2015 <http://www.ispcc.ie/campaigns-lobbying/publications/-ispcc-annual-report-2015/14783>

3. ISPCC's recommended considerations for the National Planning Framework

3.1 The rights, needs and voices of children at the centre of planning

Children and young people are individual rights holders, they require special protections and deserve specific considerations which are distinct from those of adults. When any planning for services, infrastructure and policy is being undertaken children must be considered both as part of their families and as independent, individual citizens.

***Recommendation 1:** Existing policy frameworks such as Better Outcomes Brighter Futures should be used as a guide in planning for positive outcomes for children*

Better Outcomes Brighter Futures: The national policy framework for children & young people 2014 – 2020³ (BOBF) Better Outcomes Brighter Futures has a vision for Ireland to be one of the best small countries in the world in which to grow up and raise a family, and where the rights of all children and young people are respected, protected and fulfilled; where their voices are heard and where they are supported to realise their maximum potential now and in the future. Frameworks such as BOBF should be utilised as a benchmark for how we want Ireland to be for our children both today and in the future. In the development of BOBF wide consultation took place and this included the views of 66,700 children across Ireland. The *National Planning Framework* should refer to BOBF for guidance; as a cross-departmental policy framework, BOBF has outlined clearly the outcomes to plan for and work towards for children in Ireland.

***Recommendation 2:** The right to play as an integral element of the health, wellbeing and development of children and young people must be prioritised in all planning.*

The right to play and recreation is integral to the development, health and wellbeing of a children and young people. Outcome 1 of BOBF refers to 'Active & Healthy, physical & mental wellbeing' aims to ensure that children and young people's lives are enriched through the enjoyment of play, recreation, sports, arts, culture and nature.

Safe, secure and appropriate outdoor spaces must be prioritised in all development and construction plans as well as other recreational areas for teenaged young people. Unfortunately this is not a reality for many young people in Ireland and a lack of such opportunities can have a negative impact on young people. For example, a recent ISPCC consultation among young people, youth and community workers, teachers and politicians in Douglas, Cork deemed

³ http://www.dcy.gov.ie/documents/cypp_framework/BetterOutcomesBetterFutureReport.pdf

Douglas to be “a forgotten town”; Prevalent issues among young people were identified including drug and alcohol abuse, boredom/isolation and a lack of facilities and resources⁴.

Recommendation 3: Children must be given the opportunity and be facilitated to provide their views on the National Planning Framework

Children have the right to have their voices heard particularly on matters that affect them. In this case, it is imperative that they have a say in how their Ireland will be shaped for the future. The drafting of planning process of the *National Policy Framework* must provide children and young people with the opportunity to contribute their views and ideas. *Better Outcomes Brighter Futures* while working towards an Ireland where children’s voices are heard, also represents in part the views of 66,700 children. This process should be used as a guide to wide consultation with children and young people to ascertain their opinions on what they believe to be important issues.

3.2 Appropriate housing and accommodation for families

The housing and homelessness crisis of recent years has demonstrated how ill-prepared the State was to respond in a timely, needs-led manner to support the children and their families who found themselves without a home. As planning for the future is being undertaken, a core focus should be making certain that this must not be allowed to ever happen again.

Recommendation 4: Appropriate, family-friendly accommodation must be planned for and provided should a family become homeless.

In January 2017, 730 families were living in inappropriate commercial hotel and B&B emergency accommodation (Dublin figures).⁵ Such accommodation is wholly inappropriate for children. *Rebuilding Ireland: Action Plan for Housing and Homelessness*⁶ has committed to ending the use of commercial hotel and B&B accommodation except in limited circumstances by mid-2017. While it has been reported that this deadline is expected to be met, it is imperative that such a situation does not arise again in the future. There is a need to ensure that should families find themselves without a home there is safe, appropriate and family-friendly accommodation available to house them. Such accommodation must consider proximity to local services and

⁴ A copy of ISPCC Douglas Matters consultation report is available upon request

⁵ <http://rebuildingireland.ie/news/january-2017-homeless-figures/>

⁶ <http://rebuildingireland.ie>

amenities as well as provide cooking and washing facilities and safe and secure communal areas for families to live and for children to play and study.

Recommendation 5: The plans outlined in Rebuilding Ireland to increase housing supply and accelerate social housing must be followed through and expanded upon, to look ahead to 2040 to continue to meet the needs of children and families.

Spiralling rental costs, a lack of housing supply and long social housing waiting lists are some of the issues which have contributed to the housing and homelessness crisis of recent years. Families must be supported to find and stay in secure and appropriate homes. The plans and commitments outlined in *Rebuilding Ireland* must be followed through and expanded upon, to look ahead to 2040 and ensure that the housing needs of children and families are provided for.

All housing plans and developments must ensure that amenities and local services are also provided as well as prioritising the right to play and recreation for children and young people.

In February 2016 the *UN Committee on the Rights of the Child* in its *Concluding Observations* report⁷ stated that the State must address the needs of those living in inadequate accommodation by increasing the availability of social housing and ensuring that all accommodation provided is appropriate to the needs of children.

Better Outcomes Brighter Futures Outcome 4; Economic Security and Opportunity recognises that poverty, sub-standard housing and social exclusion have a significant impact on a person's life outcomes and efforts must be made to promote social inclusion and reduce inequalities for children, young people and their families.

3.3 Health and Wellbeing

The physical and mental health and wellbeing of our children must be prioritised in the planning of both service provision and infrastructure. Without the necessary facilities in which to provide services situations where children are left on long waiting-lists or travelling distances to avail of interventions will continue. This is not acceptable.

⁷ <http://www.childrensrights.ie/resources/un-committee-rights-child-concluding>

***Recommendation 6:** Prioritise the infrastructure required to enable the provision of specialist interventions, community based primary care services, as well as supporting local services to work together to meet the physical, mental and emotional wellbeing of children.*

Successive reports from both the HSE and Child and Adolescent Mental Health services have demonstrated that services are not sufficient to meet the needs of children in a timely and appropriate manner. Much can depend on where in the country a child lives. While much of this may be attributed to issues with recruitment and resources, it is imperative that the infrastructure is available in order to provide community based primary care services, as well as enabling local services to work together to meet the physical, mental and emotional wellbeing of children.

The *National Planning Framework* should draw on the anticipated report from the Committee on the Future of Healthcare with a view to attaining a clear picture of what is required to ensure a functional, needs-led and fit for purpose health service. The ISPCC made a submission to the Committee; recommendations included:

- Establish a stand-alone fully-resourced national drug and alcohol rehabilitation service for children and young people which would allow consistently applied professional standards for treating children with addiction.
- The principle of placement of children in appropriate psychiatric units must be adhered to at all times. This will require an increase in the number of beds available in CAMHS inpatient units across the country to ensure that no child should be admitted to an adult unit, and no bed days spent in an adult unit, even in the short term.
- Ensure the recommended resources and staffing for the Child and Adolescent Mental Health Service (CAMHS) (as recommended by the current mental health strategy document *A Vision for Change*⁸) to ensure that;
 - The needs of young people in need of CAMHS support are not further compounded by unacceptable waiting lists and
 - No matter where in the country a young person may be they have access to timely and appropriate mental health support.

⁸ A Vision for Change http://www.hse.ie/eng/services/Publications/Mentalhealth/Mental_Health_-_A_Vision_for_Change.pdf

- The voice of the child must be heard in all matters relating their care and treatment. This may be done in accordance with a child's age and maturity. An obligation must be placed on all medical and therapeutic professionals to meet and engage with all children before deciding on any course of treatment or intervention.
- Establish a directly accessible 24-hour social work service for children and families across Ireland.

4. Policy Context

United Nations Convention on the Rights of the Child⁹

Article 3 – The Best Interests of the Child

All actions concerning the child must be based on his or her best interests.

Article 4 – Implementation of Rights

State parties shall undertake all appropriate measures for the implementation of rights recognised in the present Convention.

Article 12 – The Child's Opinion

The child has the right to express an opinion, and to have that opinion taken into account, in any matter or procedure affecting the child, in accordance with his or her age and maturity.

Article 13 – Freedom of Expression

The child has the right to obtain and make known information, and to express his or her own views, unless this would violate the rights of others.

Article 24 – Health and Health Services

State parties recognise the right of the child to enjoyment of the highest standard of health and facilities and must ensure the provision of necessary health care to all children with emphasis on the development of primary health care.

Article 27 – Standard of Living

Every child has the right to a standard of living adequate for their physical, mental, spiritual, moral and social development. State parties shall take appropriate measures to assist parents and others

⁹ Full Text on the UNCRC <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

responsible for the child to provide material assistance with regard to nutrition, clothing and housing.

Article 31 – Leisure, recreation and cultural activities

Children have the right to play, and to engage in recreational activities; the State shall encourage the provision of appropriate and equal opportunities for recreational and leisure activities.

5. Conclusion

The ISPCC appreciates the opportunity to make a submission on the National Planning Framework. Placing children at the centre of planning, considering their rights, needs and voice will ensure that their health and wellbeing and ability to thrive will be supported. This is the optimal opportunity to plan for robust lasting change for children in Ireland over the coming years.

If any further information is required please don't hesitate to get in contact.

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