



26<sup>th</sup> January, 2012

21/2012

## **DRAFT NATIONAL CHILDREN'S POLICY**

### **REFLECTIONS, COMMENTS AND SUGGESTIONS BY THE INTERDIOCESAN COMMISSION FOR THE ENVIRONMENT**

#### ***Introduction***

Reflecting on and actively participating in major national debates constitutes an essential part of the Kummissjoni Interdjoċesana Ambjent's (KA) remit. Consequently, the KA has, on several occasions, responded to various consultation documents addressing various aspects of Maltese society, thus actively contributing to the ensuing national debate.

For those who think that the KA's sphere of activity should revolve only around the natural environment and its protection, the KA's interest in the *Draft National Children's Policy* might seem incongruent. The KA's major interest is that of promoting and contributing to the development a sustainable society. This implies the development of a holistic perspective and approach that merges environmental, social and economic concerns into a common strategy towards a good quality of life for all.

Environmental education research has shown that our engagement with and commitment towards the environment can be traced to our childhood experiences about our surroundings. Besides being active citizens, whose decisions have a direct impact on the environment, children are also vulnerable and ultimately at the receiving end of wrong decisions that might negatively impact their future quality of life. Hence, the KA's interest in this consultation document<sup>1</sup>.

#### ***A breath of fresh air***

Bringing together the various concerns that impinge on child welfare and development and forging them into a national policy is no easy task. The KA would like to congratulate the working group for undertaking this laborious task thus addressing a long overdue need in our society. Throughout the various aspects explored, the document managed to maintain its focus:

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<sup>1</sup> Unless otherwise stated, any reference to the "document" refers to the Draft National Children's Policy

*“... that children are not people of tomorrow, but people of today, and it thus aims to bring about an understanding that children matter in their here and now, and that their needs and interests should be made visible across all sectors of society.” (p.16)*

Inherent in this assertion is the important stance that children should be valued for whom they are rather than for what they are capable of achieving or becoming. This is a very bold position in a society that has become accustomed to assessing the worth of persons, initiatives and the environment through a blinkered view of economy.

The KA also welcomes this assertion as it describes children as functional citizens and hence active participants particularly in decisions that will determine their quality of life. The direct implication of this statement is that policy makers should acknowledge the children’s duty and right of participation in society by issuing a children’s version of national consultation documents. This feature was duly recognized (p.64) – and implemented – by the draft document. The KA looks forward to the implementation of this recommendation, by subsequent national policy documents, with the publication of children’s versions that go beyond being a mere public relations exercise to a document that empowers children to make informed contributions.

### ***A holistic perspective***

One of the weak points in local and international policy documents is the liberal use of terms that describe specific traits or features consequently making such terms trendy. However, the subsequent lack of implementation of these terms ends up relegating them to clichés in the realities of policy making fora. The term ‘holistic’ is such a term. Approaches that are holistic purport to integrate various perspectives, interests and actions into a whole to make the best use of resources, avoid conflicting initiatives and thus achieve better results. Unfortunately this integration is relatively hard to come by ... even at the policy document level. The KA feels that the current document needs to present a truly holistic view in the following areas:

- **Sustainable development:** The document rightly acknowledges the need for “*a healthy and sustainable environment*” (p.26) as an essential dimension of the child’s wellbeing. Sustainable development involves the blending of environmental, social and economic concerns to ensure quality of life. The document adopts and promotes a predominantly social perspective ensuring – and rightly so – the setting up of infrastructures that ensure the social wellbeing of the child. However, it fails to effectively contextualise this perspective within current economic and environmental challenges.

With particular reference to environmental concerns, while acknowledging that the “*children’s well-being is associated with the environment they interact in*” (p.26), the document fails to effectively incorporate this important dimension in its policy actions. The document suggests that environmental issues can be addressed just

by promoting environmental awareness thus failing to seriously consider the impact a degraded environment has on the child's development. Consequently the document marginally addresses issues concerning environmental health, environmental security and environmental justice in relation to reducing risk factors and protecting the child's vulnerability.

- **Policy making:** Our country has gradually produced a plethora of documents in an effort to recognise and respond to the lack of clear policies in various sectors. However, there is an inherent danger that each working groups developing such policy documents, do so in isolation from one another ... even when working on the same target area. Consequently policy development tends to be fragmented thus impacting negatively on implementation.

The KA feels that, while the document rightly recognises "*that a children's policy cannot be viewed in isolation from other policies*" (p.17) and refers to various international treaties and conventions, it fails to relate its policies to the recently published draft National Curriculum Framework (NCF). The current document makes several suggestions for the inclusion of various items in the curriculum ... inclusions that were (unknowingly?) already addressed by the NCF. It would have been more useful if the current document commented on whether its recommendations were adequately addressed by the NCF and what else remained to be done. Unfortunately this was another missed opportunity for holistic policy development.

### ***The hidden implications of the document's proposals***

Nevertheless, the KA would like to commend the working group for highlighting and addressing various aspects that define a child's wellbeing. Upon reflecting on these aspects, the KA would like to point out what it thinks are the inherent implications of certain standpoints taken by the document ... implications that need to be clearly outlined in the document's Key Policy Actions.

- *Adults working in this sector (development of children's programmes) are to be accountable for what is transmitted through their means of information.* (p. 38-39)

While acknowledging the presence of examples of good practice, the KA notes that unfortunately there is an overwhelming number of children's programmes that leaves a lot to be desired. The adults producing or presenting such programmes tend to do so off the cuff making comments and adopting mannerisms that are not always appropriate for children. Besides being of dubious educational value, the content of such programmes is usually dictated by the sponsoring companies ... which, more often than not, give conflicting messages about healthy nutrition, consumer education and environmental responsibility. At times these messages, force particular lifestyles onto the children's subculture that result in peer pressure over the child's (and the family's) way of life. This is tantamount to emotional abuse (p.54) and needs to be addressed.

The Key Policy Actions should thus include the formulation of a Code of Practice that specifically regulates the production of children's programmes as well as the advertisements screened during such programmes. This would also entail the setting up of an agency entrusted with the enforcement of the Code of Practice.

- *In prioritising protection of children, it is acknowledged that a stronger focus is to be placed on better prevention services, giving access to children and their families, to ensure that their quality of life is not put at stake. A renewed commitment is thus to be directed towards prevention, early intervention and community-based support, involving children and their families. (p.55)*

This echoes what the document highlights in section 5.2.4 (p.58), i.e. a co-ordinated response to child protection. However, the KA believes that there is an underlying stance that Maltese society needs to adopt **before** clear policies concerning prevention of child abuse are implemented. Although prevention is better than cure, at times Maltese society seems more willing to mop up the mess rather than to impose checks on incongruencies that we have grown accustomed to. For example, the whole child abuse prevention debate opens wide open the censorship issue (i.e. whether to control the easy availability of unacceptable material and who decides what is unacceptable), the child labour issue (i.e. whether family-run businesses are excused from it and whether we should allow the sale of products that are gaining financial advantage from child exploitation) and the frequenting of certain entertainment joints by under-age children. Maltese society needs to clearly decide what it values and how much it is willing to sacrifice for them.

When speaking about issues related to protection, the document affirms that “*a number of ambiguities still persist*” (p.47). One such ambiguity stems from the pitiful experiences of children engrossed in parental custody battles. There have been reported cases of children who may not be offered the protection they need from the very agencies/institutions who should be protecting them. The KA would like to suggest the setting up of an overseer of these agencies/institutions who makes sure that true protection is being given and to whom cases of abuse of power could be reported and investigated. This task could easily be taken up by the “*central Observatory responsible for children*” suggested in p.51.

The hot spots where child abuse is rampant are well known. What is missing is the will to address them considering that, at times, this implies taking unpopular actions. Acknowledging that such actions require adequate resources, the KA suggests the rewording of Key Policy Action: Protection, No. 3 (p.59) thus: “*Setting up multi-agency training and enforcement mechanisms to promote prevention, protection and curb all forms of abuse*”.

- *Streets have become busier, traffic and pollution have increased, and green areas have been reduced. As a consequence, outdoor playing is, for many, no longer an option.* (p.80)

The reality highlighted above is further compounded by the ever increasing trend of using the TV, computers and game consoles as electronic baby sitters, further reducing the chances of children to experience the outdoors. Research<sup>2</sup> has shown that learning and playing outdoors is crucial for the sound physical, emotional and educational development of children. However, the document seems to highlight just the play aspect of the outdoors. The environment and the surrounding community are a great resource that provides children not just with an opportunity for play, but also with a myriad of learning experiences. Consequently, the KA feels that the document should acknowledge this and propose Key Policy Actions that ensure that every child has adequate access to out-of-class activities during his/her formal education. While the NCF acknowledges *other settings where learning takes place* (NCF, Vol.2, p.49), it does not propose principles about how this can be achieved. The Key Policy Actions of the Draft National Children's Policy should include actions that help clarify these principles.

The document's recognition of the importance of space also has another important implication. Local Plans and other regulations controlling urban development and town planning should include policies that conserve open spaces – not just public gardens and playing fields, but also undeveloped areas of land – although the unsustainable way urbanisation has developed in certain localities may have already jeopardised this. The KA suggests that such protected spaces should be designated as “child spaces” to highlight their value re safeguarding the right of current and future generations of children to enjoy the outdoors.

### **Conclusions**

The KA would like to reiterate that the importance of this document is that it focuses public attention on children and issues related to their vulnerability and protection. The major argument, weaving throughout the document, is that children should be valued for who they are and not for what they can achieve. The KA would like to point out that in order to respond to the needs highlighted by the document, Maltese society needs to clarify its value system and decide what it really values and what it is willing to forfeit in order to safeguard its most prized possession ... the child.

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<sup>2</sup> Coyle, K. J. (2010) *Back to School: Back Outside!* Reston, VA: National Wildlife Federation. This report presents a summary of the available studies (in the US) that highlight how play and learning in the outdoors are having a positive impact on the children's overall education.