

23 March, 2012

Auckland Council  
The Long-Term Plan 2012-2022  
Private Bag 92300  
Auckland 1142

### **Draft Long-Term Plan 2012-2022**

1. Thank you for the opportunity to provide feedback on the Draft Long-Term Plan 2012-2022.
2. As Children's Commissioner, I have a statutory responsibility to advocate for children's interests, rights and welfare, including advancing and monitoring the application of the UN Convention on the Rights of the Child (UNCROC) by departments of State and other Crown instruments.<sup>1</sup> My powers, functions and responsibilities are contained in the Children's Commissioner Act 2003 and the Children, Young Persons and Their Families Act 1989. I am an independent Crown entity.
3. I am providing feedback on the *Draft Long-Term Plan 2012-2020* as I believe that the *Long-Term Plan 2012-2022* provides a significant opportunity to enhance the well-being of children and young people in the Auckland region.
4. I understand that all feedback will be available under the Local Government Official Information and Meetings Act 1987, except if grounds set out under the Act apply.
5. The primary contact for this submission is:

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<sup>1</sup> Children's Commissioner Act 2003, section 12(1)(f)

Submission to: Auckland Council

Date: 23 March, 2012

## **DRAFT LONG-TERM PLAN 2012-2022**

### **Making Auckland a Great Place for Children**

#### **Introduction**

1. Thank you for the opportunity to provide this submission on the Auckland Council *Draft Long-Term Plan 2012-2022 (Draft LTP)*.
2. As Children's Commissioner, I have a statutory responsibility to advocate for children's interests, rights and welfare, including advancing and monitoring the application of the UN Convention on the Rights of the Child (UNCROC) by departments of State and other Crown instruments.<sup>2</sup> My powers, functions and responsibilities are contained in the Children's Commissioner Act 2003 and the Children, Young Persons and Their Families Act 1989. I am an independent Crown entity.
3. I welcome the priority the Auckland Council and others have accorded children and young people in the *Draft Auckland Plan*. In my view this provides a significant opportunity to enhance the well-being of children and young people in the Auckland.
4. Continued emphasis on achieving better outcomes for children and creating a child-friendly city is vital. The interests, rights and well-being of children must be built into coherent and coordinated policy and action - based on good data. It is also important that children and young people have a say in matters that impact on them.
5. The *Long-Term Plan 2012-2022 (LTP)* is critical to Auckland Council's role in implementing the Auckland Plan over the first 10 years of its life as it aligns Council's services, projects and programmes to these five transformational shifts that are designed to achieve the outcomes and vision described in the Auckland Plan. It determines their funding requirements over the next 10 years to deliver the activities and services levels that are important to Aucklanders and includes the agreements of the 21 local boards, which have been developed from each local board plan.
6. I support the Council's and Local Boards' commitment to community-led development. International<sup>3</sup> and local experience<sup>4</sup> has shown that such approaches can achieve substantial gains for children and young people as local resources, energy and ideas are released to create opportunities and solve problems.
7. I note, however, that the while the *Draft LTP* sets out some specific proposals in relation to children and young people, there is little evidence that these proposals are to be strategically linked and integrated across Council.
8. This submission will therefore build upon previous submissions, recommending that Council formally adopt UNCROC and UNICEF Child-Friendly Cities

<sup>2</sup> Children's Commissioner Act 2003, section 12(1)(f)

<sup>3</sup> Refer to the Harlem Children's Zone, [www.hcz.org](http://www.hcz.org)

<sup>4</sup> Inspiring Communities, [www.inspiringcommunities.org.nz](http://www.inspiringcommunities.org.nz)

frameworks to assist them in better aligning, integrating and driving their work in relation to children and young people across council, with Local Boards, Council-Controlled Organisations and with central government.

9. Given the scope of the *Draft LTP* I have structured my feedback on the following broad areas as well as more specific proposals outlined in the discussion document:

**PART A: GOVERNANCE AND PLANNING**  
**PART B: BUILT AND NATURAL ENVIRONMENT**  
**PART C: TRANSPORT**  
**PART D: HOUSING**  
**PART E: LIBRARY SERVICES**  
**PART F: YOUTH IN SPORT AND RECREATION PLAN**  
**PART G: ENTRY FEE INTO LOCAL SWIMMING POOLS**  
**PART H: PROPOSED CHANGES TO COMET**  
**PART I: THE SOUTHERN INITIATIVE**

## **PART A: GOVERNANCE AND PLANNING**

### **UNCROC and UNICEF Child-Friendly Cities**

10. The New Zealand Government ratified UNCROC in 1993 and, in doing so, agreed to bring New Zealand's laws and policies into line with its provisions and principles. The UNCROC therefore provides a framework upon which policy and legislation that affects children and young people (aged 0-17 inclusive) ought to be built.
11. The provisions of UNCROC also apply to the functions of local government authorities who wield delegated authority from the Crown through legislation. In their recent Concluding Observations on New Zealand, the UN Committee on the Rights of the Child recommended the development of comprehensive policies, co-ordination mechanisms, child-specific budgetary mechanisms and systematic training programmes in order to progress the Convention's implementation.
12. In addition to its implementation framework, UNCROC is underpinned by four general principles. These can be paraphrased as follows:
- The right to protection from discrimination (Article 2)
  - The best interests of the child shall be given primary consideration in all institutional, administrative, legislative and judicial actions (Article 3)
  - The right to life, survival and development (Article 6)
  - The right to participation in decision-making processes (Article 12)
13. The strategic priorities to *Put Children and Young People First* and to *Improve the Education, Health and Safety of Aucklanders, With a Focus on Those Most in Need* outlined in the *Draft Auckland Plan* fits well with these principles. Further to this, the UNICEF Child-Friendly Cities (CFC) framework provides a specific set of measures or 'building blocks' towards realisation of this objective. They are:
- Children's Participation
  - A Child-Friendly Legal Framework
  - A City-Wide Children's Rights Strategy
  - A Children's Rights Unit or Co-ordinating Mechanism
  - Child Impact Assessment and Evaluation
  - A Children's Budget

- A Regular State of the City's Children Report
- Making Children's Rights Known
- Independent Advocacy for Children

14. A Child-Friendly City is seen as the 'embodiment' of the implementation of UNCROC at the local level. It is indicated by the implementation of children's rights in the legislative, policy, administrative and budgetary mechanisms of governance and through the recognition of children as 'active agents' or full citizens, with their views taken into consideration and given due weight in decision-making processes.

15. The *Auckland Plan*, and Councils' LTP and Unitary Plans present ideal opportunities to embed the Child-Friendly Cities framework as a core element in the direction and development of Auckland over the next 10-30 years. Realisation of the principles embodied in the framework is very achievable and would certainly, in my view, give effect to the strategic priority to put children and young people first.

16. My office's previous submissions have advocated for Council to utilise the UNICEF Child Friendly Cities 'building blocks' to enable the Auckland Council to realise its objective to 'Put Children and Young People First'<sup>5</sup>. Council's response to these recommendations has been encouraging. I have set out below ways that the Child-Friendly Cities 'building blocks' can be utilised to enable the Auckland Council to fulfill its role in realising the strategic priorities in relation to children and young people outlined in the *Auckland Plan*.

**Recommendation 1:** I strongly recommend that the Auckland Council adopts a UNICEF Child-Friendly Cities Framework as a way of achieving its target of putting children and young people first.

#### CFC Building Block: A Regular State of the City's Children Report

17. In previous submissions I recommended that the Council produce a regular State of Auckland's Children Report<sup>6</sup> that would provide the Council, Local Boards, Council Controlled Organisations' (CCO's) and other groups with a baseline of children and young people's wellbeing indicators to inform planning processes, monitoring progress against planned targets and increasing awareness among the community and policy makers.

18. The Council is currently compiling its inaugural biannual publication focused on Auckland children and young people. I welcome this initiative as first step towards improving advocacy, establishing priorities, engaging diverse stakeholders, and setting a baseline from which interventions can be evaluated.

19. It will be important that this report is used to inform the development of the LTP, in particular in the prioritisation of programmes, services and funding and in monitoring progress against planned targets and increasing awareness among the community and policy makers.

**Recommendation 2:** I recommend that the Auckland Council, Local Boards and CCOs use the Council's report on children and young people as a baseline of children and young people's wellbeing, develop and build in indicators within the

<sup>5</sup> Office of the Children's Commission submission on the Draft Auckland Plan, 2011

<sup>6</sup> The report should be used as a building block for creating a Child Friendly Auckland and should be prepared and published in forms that make it genuinely accessible not only to key policy makers and community leaders, but also to the public and to children.

*Auckland Plan, LTP and Unitary Plan* to inform planning processes, monitoring progress against planned targets and increasing awareness among the community and policy makers.

**Recommendation 3:** I recommend that the Auckland Council, CCOs and Local Boards:

- Utilise other sources of data in order to identify gaps in knowledge which inhibit evidence-based policy-making in the city.
- Involve children and families when collecting data on existing initiatives and issues affecting children in order to raise community awareness and empower it to propose solutions.

#### CFC Building Block: A Co-ordinating Mechanism

20. In order for the Council to implement its strategic priority to put children and young people first, it will need a high-level policy mechanism that is responsible for co-coordinating implementation and ensuring that appropriate priority is accorded to consideration of children's interests and perspectives across all relevant Council business. This mechanism should be connected to the highest political level within Council, linked to all relevant Council departments, have links with Local Boards and community stakeholders and have a role in facilitating children and young people's participation in Council decision-making processes.

21. In addition, it will be important to identify contact points and key officials responsible for ensuring/developing a children's perspective in each department or area of government. This is required both for internal co-ordination across government and also for those externally who need to be able to identify who is responsible for children and their rights.

**Recommendation 4:** I recommend that the Council establish a high-level policy mechanism responsible for co-ordinating and implementing its strategic priority to put children and young people first. The mechanism would pursue implementation of the *Auckland Plan* through the *LTP, Unitary Plan* and other relevant plans. This mechanism would also develop and implement policies and strategies such as the *Child and Youth Strategy* and *Action Plan*, ensuring effective co-ordination, monitoring and evaluation.

#### CFC Building Block: Child and Youth Participation

22. Children and young people have a right to a voice in local governance arrangements and in the planning and delivery of services. This reflects their right under UNCROC to have their views taken into account and given weight in decisions affecting them<sup>7</sup>. They are also important users of local authority services including public transport and recreational and cultural facilities such as libraries and swimming pools. As such children and young people have a strong interest in the design, control and delivery of these facilities and services<sup>8</sup>.

<sup>7</sup> Particularly article 3 (best interests of the child), article 12 (respect for the views of the child), article 13 (child's right to freedom of expression) and article 31 (child's right to leisure, play and culture) of the United Nations Convention on the Rights of the Child.

<sup>8</sup> In preparing this submission, my Office consulted with the Commissioner's Young Persons Reference Group (YPRG). The YPRG felt that avenues and opportunities for participation of young people in civic decision-making should be improved and given greater weight. The role of youth councils should be promoted and enhanced. The YPRG considered that the views of young people are currently often ignored in policy making. They also considered that councils could improve their means of communicating with young people and also build better links with community organisations and professionals who work with young people.

*The decisions made by Council affect us. A key thing to remember is that children and young people, because of our age are not rate payers or voters so we have no way to express our points of view in relation to local government... We and other children and young people have useful opinions, insights, thoughts and solutions to contribute to making Auckland a SUPER, super City<sup>9</sup>.*

23. As members of the YPRG point out, without deliberate action or consideration, children and young people have limited opportunities to directly effect change or input into decisions about services. Because of their age and evolving capacity, they must rely on adults to achieve many of their goals and aspirations.
24. The *Draft LTP* does not indicate how Council wants to support and encourage children and young people to participate in policy, planning and decision-making in relation to the priority areas outlined in the *Draft LTP*. I am of the view that a Child and Young People's co-coordinating mechanism, as outlined above, could provide an ideal means of promoting innovation and best practice in working collaboratively with children and young people across Council, with Local Boards, CCOs and other relevant stakeholders.

**Recommendation 5:** I recommend that the Child and Young People's Co-coordinating mechanism should act as a centre of innovation and expertise to foster the practical realisation of Article 12 of UNCROC in Council's, Local Boards and CCO's planning and decision-making processes and day-to-day activities.

**Recommendation 6:** I recommend that the Council works with Local Boards and other stakeholders to create models for regional and local engagement with children and young people. This would include outlining how the Council, Local Boards and relevant CCO's intend to work with the Auckland Youth Panel and children and young people from Maori, Pacific and other ethnic backgrounds to ensure that they are supported to participate in the Council's, Local Board's and CCO's planning, policy and decision-making processes<sup>10</sup>.

**Recommendation 7:** I recommend that the Council establish a performance measure that captures the percentage of core strategies and plans developed with children and young people's participation.

**Recommendation 8:** I recommend that the Council establish a performance measure which captures the percentage of strategies and plans that include outcomes and indicators relating to children and young people.

#### CFC Building Block: Child and Youth Strategy

25. Once finalised as part of the *Auckland Plan, LTP, Unitary Plan* and other relevant planning processes a Child and Youth Strategy will need to be developed in order to translate aspirations into reality. If the Strategy is to be implemented successfully, it will need to be well understood by all relevant participants at the Council, Local Board, CCO, community and neighbourhood level. It needs to be made available to children and to those working with and for children and translated into appropriate and accessible languages and forms.

**Recommendation 9:** I recommend that the Council set up a multi-sectoral group

<sup>9</sup> Tawera and Amanda, Auckland based members of the YPRG.

<sup>10</sup> The concept of Nga Manukura: Maori leadership may be of value in both encouraging rangatahi and non-Maori youth in becoming more involved with Council. Te Roopu Puwai provides one model for Rangatahi engagement and leadership used by the former Waitakere City Council.

to assist the Council in creating a Child and Youth Strategy and Action Plan. This would provide issue/sector specific advice, and could include an exploration of impact assessments and models and approaches for engagement with children and young people.

**Recommendation 10:** I recommend that the Child and Young People's Co-ordinating mechanism would coordinate and monitor a detailed, comprehensive Child and Youth Strategy and Action Plan, setting real and achievable targets in relation to the full range of economic, social and cultural and civil and political rights for children.

#### CFC Building Block: A Children's Budget

26. UNCROC requires States Parties to implement economic, social and cultural rights of children 'to the maximum extent of available resources'. However it is difficult for central government or local government authorities to determine how it is fulfilling this obligation without detailed and accurate budget analysis, including a framework for examining how budget expenditures impact upon children<sup>11</sup>.
27. Just as local government needs to act as an advocate for its children in relation to national laws, so it does in relation to national budgeting, ensuring that its children – and in particular disadvantaged children – are getting their fair share of resources. Where the financing of key services like education and health is determined nationally rather than locally, local government will need to consider whether the distribution of resources is equitable and what it can do to redress inequalities or discrimination in the application of resources<sup>12</sup>.

**Recommendation 11:** I recommend that the coordinating Children and Young People's mechanism would also have responsibility to oversee a children's budget. Budgets are one particular way in which actions by a city affect children, and so budget analysis forms an important aspect of child impact assessment.

**Recommendation 12:** I recommend the Auckland Council and Local Boards advocate for Auckland's children and young people in relation to central government legislation, budgetary processes, policy and the provision and distribution of services in Auckland.

#### CFC Building Blocks: Child Impact Assessment and Evaluation/Legal Frameworks

28. Under UNCROC, statutory decision-makers at all levels, including local governments, are required to ensure that the best interests of the child are a primary consideration in all actions concerning children. However, without a rigorous process in place to assess the impact of law, policy and practice on children, this important concern can easily be overlooked.
29. In my office's submission on the *Draft Auckland Plan* I supported the Council's intention to develop an impact assessment that allows council to consider the impact of council plans, programmes and projects on children and young people and their families.
30. Should the Council explore the use of child impact assessments, I refer the Council to the 2007 report prepared by Dr John Angus for the Ministry of Social

<sup>11</sup> Building Child Friendly Cities: A Framework for Action, p.14

<sup>12</sup> Ibid, p.14

Development as a useful guide. In this report Dr Angus concludes that:

- *Child impact assessment on its own will not put children at the centre of policy making*
- *There is not a strong case for implementing child impact assessment processes in any but a selective and negotiated way where criteria about scale, 'depth' and nature of impact are met*
- *Where those criteria are met, the evidence suggests that processes akin to those used for health impact assessment are the most likely to be effective in terms of take up and impact<sup>13</sup>.*

31. I agree with Dr Angus that child impact assessments are not the only ways in which governments and local governments can put children more at the centre of policy making. As Dr Angus outlines in his report, additional processes can be used to either complement child impact assessment or as an alternative to it, in order to bring children more to the centre of policy making.

<b>Recommendation 13:</b> I recommend that the Council:
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| <ul style="list-style-type: none"> <li>• Test legislation, bylaws, policies, strategies and programmes against UNCROC</li> <li>• Bolster the input into the policy process from external agencies such as the Children's Commission and Action for Children and Youth Aotearoa (ACYA)</li> <li>• Use some sort of enhanced, well-marketed and transparent checklist to look at potential impacts of bylaws, policies, strategies and programmes on children (an example is given as appendix 1)<sup>14</sup>.</li> </ul> |
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<p><b>Recommendation 14:</b> I recommend that if the Council does decide to create and implement a Child Impact Assessment tool consideration of Health Impact Assessments and Whanau Ora Health Impact Assessments (WOHIA)<sup>15</sup> would be useful in the development of Council's proposed child impact assessment.</p>
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#### Council Controlled Organisations (CCOs)

32. The Council has a number of mechanisms and processes for ensuring its substantive CCOs activities are aligned with the strategic priorities to *Put Children and Young People First* and to *Improve the Education, Health and Safety of Aucklanders*.

33. The Annual Letter of Expectation provides guidance to CCOs to inform the SOI process by communicating the Council's priorities for each CCO each year. Under the Local Government (Auckland Council) Act, substantive CCOs are required to act consistently regarding relevant aspects of any plans or strategies of the Council, to the extent specified in writing.

34. The Statement of Intent (SOI) is an essential part of the accountability regime for CCOs, as it sets out:

1. how the CCO's activities will contribute to its outcomes (which contribute, in turn, to the Draft Auckland Plan)

<sup>13</sup> Ibid. p.48

<sup>14</sup> Angus, J. (2007) Placing Children at the Centre of Policy Making: A Discussion Paper on Child Impact Assessments. Paper presented for the Social Services Policy Division of the Ministry of Social Development. It is important to note that this paper does not represent Ministry of Social Development Policy. p. 48

<sup>15</sup> The Whanau Ora Health Impact Assessment tool was developed for use by policy makers to assess the positive and negative impact of their policies on Maori and to identify ways in which these could be enhanced or adapted. <http://www.moh.govt.nz/nsf/indexmh/hiasupportunit-whanauora>.

2. how the CCO's performance will be measured in relation to these outcomes
3. the specific performance targets that each CCO expects to meet.

**Recommendation 15:** I recommend that the Council include in their annual Letter of Expectation a requirement to build consideration of children's interests, voice and wellbeing into each CCO's SOI and subsequent work programmes.

### Local Boards

35. Similarly, local board agreements provide a mechanism to better align the Council and Local Boards work to protect and advance children and young people's well-being.

**Recommendation 16:** I recommend that the Council work with Local Boards to ensure that children and young people's interests are given weight and that they enable children and young people to become actively engaged in local and Auckland-wide issues.

**Recommendation 17:** I recommend that the Council and Local Boards build consideration of children's interests, voice and wellbeing into the draft local board agreements as these agreements set out the proposed priorities, projects and levels of service for each local board area.

## **PART B: BUILT AND NATURAL ENVIRONMENT**

### **Urban Auckland**

36. Improving the quality of urban living is essential as the Auckland region is projected to experience rapid population growth and increasing urban density over the duration of the Auckland Plan. This reflects international projections of ever-increasing global urbanization over the next four decades<sup>16</sup>.

37. It is essential to have a cityscape that is not only unique but is also 'safe'<sup>17</sup> and promotes social cohesion in the population living in the urban centres. Societies with better social cohesion have better health outcomes overall<sup>18</sup>.

38. The Council has an important role to play to help ensure that urban design supports social well-being and facilitates social cohesion, rather than leads to social polarization.

39. There are some key projects included in this *Draft LTP* which will influence the future growth of Auckland and others that seek to rectify existing issues.

40. The next key piece of work is the *Unitary Plan* which is required both by legislation and in order to achieve the vision of the Auckland Plan. This is a major project that will span several years and is budgeted at \$6.5 million.

41. Priority will need to be given to creating child and youth friendly urban environments. Urban design and planning should physically support the developmental needs of children and young people. Civic services should also

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<sup>16</sup> UN\_HABITAT 2010

<sup>17</sup> see the injury prevention section of Part B of this submission for comments regarding the defining of 'safe'.

<sup>18</sup> Public Health Advisory Committee (2008) Re-thinking urban environments and health. Wellington.

be framed to incorporate and enhance the social and developmental needs and interests of children and young people.

**Recommendation 18:** I recommend that design assessments for all new public realm projects are undertaken to assess and consider the needs of children, particularly disabled children.

**Recommendation 19:** I recommend that the development of recreational areas and green, open spaces, such as parks and reserves, are accorded priority in urban planning and, to this end, are included in the proposed Auckland Design Compendium.

42. The Auckland Urban Design Panel also has an important role to play to ensure that children's interests are considered and given weight when reviewing major development proposals.

**Recommendation 20:** I recommend that the Auckland Urban Design Panel either includes an expert on child-friendly built environments or that the Design Panel set up an advisory group which would include such an expert to assist them in reviewing major development proposals.

43. My Office is aware that the Council is looking to develop a comprehensive design manual to guide and support their work.

**Recommendation 21:** I recommend that the Council develop a comprehensive design manual to inform the design and function of new development and the public realm, including the street environment.

**Recommendation 22:** I recommend that the Council set up an advisory group to assist them in developing the design manual and that an expert on child-friendly urban design is included in this group.

**Recommendation 23:** I recommend that children's interests and child-friendly design principles are woven throughout the design manual.

## PART C: TRANSPORT

44. Auckland is anticipated to grow to around 2.1m people by 2041. Demand for travel is anticipated to increase by 50 per cent for person trips each day over current levels while freight and commercial trips are expected to double.

45. The *Draft LTP* proposes to manage this growth in accordance with the strategic objectives set out in the *Auckland Plan*. The Council is proposing some significant projects to give Aucklanders improved transport options. These include the City Rail Link (CRL), the Auckland Manukau Eastern Transport Initiative (AMETI) and improving bus speeds and reliability on Dominion Road and investigating the possibility of a second harbour crossing.
46. In Part A of this submission I set out recommendations regarding frameworks to assist the Council, Local Boards and CCO's in ensuring that children's interests, voice and well-being are taken into account and given weight in their planning, decision-making and programme delivery. In relation to issues regarding transport I ask that the Council, Local Boards and Auckland Transport also prioritise road safety in relation to children and young people.

#### The importance of road safety in protecting our children and young people

47. Children are vulnerable to injury and especially those younger, are dependent on adults for safety in their environment.
48. The WHO 'World Report on Child Injury Prevention'<sup>19</sup>, identifies child injury as a growing global health problem with priorities in road traffic, drowning, falls, burns and poisoning. In New Zealand injury is the leading cause of death for children 1-19 years and the leading cause of hospitalisation (for stays >24 hours) for 5-14 year olds<sup>20</sup>.
49. A social gradient for child injury is evident in NZ<sup>21</sup> and a high proportion of children in NZ live in poverty. Poverty is rising among younger adults and families with children while dropping among older people<sup>22</sup>.
50. NZ compares poorly with a number of OECD countries with respect to its road traffic death rate<sup>23</sup>. NZ 15-17s had the second highest of the 28 OECD countries. The 18-20s were 6<sup>th</sup> highest.
51. There is some mention in the *Draft Auckland Plan*, *Draft LTP* and *Regional Land Transport Programme 2012-2015* of road safety and I acknowledge the proposed injury target contained within the transport chapter of the *Draft Auckland Plan* and the proposed road safety education plans and investment of improved road safety around schools at a cost of \$80 million over 10 years in the *Draft LTP*. There are, however, no priorities or directives that specifically relate to general road safety. I believe that considering the downstream cost of poor road safety that a strategic commitment to road safety needs more emphasis.
52. Interventions that are known to work require action by the government, institutions, communities, parents and carers<sup>4</sup>. Auckland Council's wide functions (regulation, service delivery, place shaping and choice architect) provide substantial opportunities for preventing injury and trauma.

<sup>19</sup> Peden M, Oyegbite K, Ozanne-Smith J, Hyder AA, Branche C, Rahman AKMF, et al. (2008). *World Report on Child Injury Prevention*. Geneva: World Health Organization.

<sup>20</sup> Gulliver PJ & Simpson JC (2007) Injury Prevention Research Unit: Factsheets No 38 and No 39; <http://www.otago.ac.nz/ipru/FactSheets/FactSheet38.pdf> and <http://www.otago.ac.nz/ipru/FactSheets/FactSheet39.pdf>

<sup>21</sup> Shaw C, Blakely T, Crampton P, Atkinson J. (2005) The contribution of causes of death to socioeconomic inequalities in child mortality: new Zealand 1981-1999. *NZMJ*, 118(1227) URL: <http://www.nzma.org.nz/journal/118/1227/1779/>

<sup>22</sup> OECD Annual Report 2009 (Accessed <http://www.oecd.org/dataoecd/38/39/43125523.pdf>, March 2010)

<sup>23</sup> IRTAD (International Road Transport Accident Database (OECD)) (2009) International road traffic and accident database. <http://www.internationaltransportforum.org/irtad/pdf/risk.pdf>

**Recommendation 24:** I recommend that the Council and Auckland Transport emphasise the importance of the health and safety of children by preventing injuries from occurring by including a high level acknowledgement of traffic in the *Auckland Plan, LTP and the Regional Land Transport Programme 2012-2015*.

53. Area wide traffic calming and reduction of speed around schools, coupled with community partnerships for enforcement and public education have been shown to be effective and best practice Public Health Guidelines have been developed<sup>24</sup>.

**Recommendation 25:** I recommend that the Council and Auckland Transport makes traffic safety an explicit focus when planning transportation and infrastructure for Aucklanders in order to maintain and promote health and safety for all Aucklanders (especially children).

## PART D: HOUSING

### The importance of housing for children's health and wellbeing

54. The Auckland Region had 50 percent of all cases of Acute Rheumatic Fever (ARF) cases in New Zealand from 1996-2006 with CMDHB having the greatest number<sup>25</sup>. ARF mainly affects children and young people resulting in lifelong rheumatic heart disease and is a condition where almost all cases are preventable<sup>26</sup>.

55. Maori and Pacific Island children are especially affected by ARF. This incidence of ARF is largely contributed to by housing overcrowding<sup>27</sup> and poor quality housing. The same observation can be made for other infectious diseases such as meningococcal disease<sup>28</sup> and skin infections.

56. I commend the Council on its commitment to addressing issues relating to housing in Auckland, in particular the negative impacts that inadequate housing contributes to. I am, however, disappointed that priority has not been given to housing related issues in the *Draft LTP*. It is vital that the Council prioritise and facilitate the delivery of better housing conditions to improve the health of our children. Housing is a key enabler and support for efforts by the education, health and social welfare sectors will provide one of the key foundations for Auckland's long term prosperity and success.

**Recommendation 26:** I recommend that the Council includes in the *LTP* a regional proposal which priorities address housing related issues with relevant stakeholders.

**Recommendation 27:** I recommend that:

<sup>24</sup> NICE: National Institute for Health and Clinical Excellence (2010). NICE Public Health Guidelines 31 Preventing unintentional injuries among children and young people aged under 15: Road design and modification, [NICE Public Health Guidance](#). National Institute for Health and Clinical Excellence. London.

<sup>25</sup> Jaine R, Baker M and Venugopal K. Epidemiology of acute rheumatic fever in New Zealand 1996-2005. *Journal of Paediatrics and Child Health*. 44 (2008) 564-571.

<sup>26</sup> Lennon, D. Acute Rheumatic Fever. In: Feigin R and Cherry J (Eds), *Textbook of Pediatric Infectious Diseases*, 5th ed. Philadelphia: WB Saunders; 2004: 413-26

<sup>27</sup> Lennon D, Martic D, Wong E, Taylor LR. Longitudinal study of poststreptococcal disease in Auckland: rheumatic fever, glomerulonephritis, epidemiology and M typing 1981-86. *NZ Med J* 1988; 101: 396-8

<sup>28</sup> Baker M, McNicholas A, Garrett N et al. Household crowding a major risk for epidemic meningococcal disease in Auckland children. *Pediatric Disease Journal* 2000; 19: 983-90

1.	The Council commit to working with Housing New Zealand, the housing sector, DHBs, ARPHS, and the social services sector to further develop and refine the proposed housing-related targets and measures set out in the <i>Draft Auckland Plan</i> in the monitoring and evaluation framework.
2.	The Council ensures that its proposed housing policies don't lead to geographically based social polarization.
3.	The Council continues current programmes that provide some home insulation funding and expand the programmes across the entire region in the future.
4.	The Council re-consider the proposed overcrowding target proposed in the <i>Draft Auckland Plan</i> and reduce it to no more than 5 percent overcrowded houses by 2040.
5.	The Council include access to health and education services as one of the issues considered when planning housing developments.
6.	The Council considers possible mechanisms to improve the quality of rental housing.

## PART E: LIBRARY SERVICES

57. Local libraries are an essential public good, providing a gateway to knowledge, lifelong learning, recreation and cultural development that benefits individuals and the community as a whole. Libraries provide for a range of needs in the community ranging from leisure and education to raising literacy levels, to providing a meeting place for local communities.

58. I support the Council's proposed priority to evaluate and determine the need for and location of new libraries and to develop strategies for library services for children, Māori and diverse communities.

**Recommendation 28:** I recommend that the Council work Local Boards, education providers, communities, children and young people and other stakeholders when developing its strategy for library services for children. This will help identify need, ensure that children and young people engage with their local libraries and that libraries support community priorities and their development.

## PART F: YOUTH IN SPORT AND RECREATION PLAN

59. Sport, recreation and play are essential to the social, emotional, cognitive, and physical development and well-being of children. As the SPARC Sport and Recreation New Zealand publication *It's All About Children and Young People: Implementing a child/young person centred philosophy in sport and recreation*, points out, ongoing participation in sport, recreational and play activities can contribute to:

- development of social skills and moral and ethical behaviour;
- development of personal skills such as problem-solving, communication, decision-making and leadership;
- understanding and feelings of inclusiveness and empathy with the needs of others;
- transmission of cultural norms and values;
- opportunities for the development of personal and group identity;
- improvement and maintenance of physical, mental and emotional health;
- productive use of leisure time; and

- helping individuals, groups and communities of people realise their full potential<sup>29</sup>.

60. I support the Council's priority over the next 10 years to drive an innovative and collaborative approach to deliver the Youth in Sport and Recreation Action Plan to provide sport and recreation opportunities for all our children and young people at an estimated cost of \$1.2 million over the life of this plan.

61. It is important that the Plan addresses some of the socioeconomic barriers which stop or impede children and young people from enjoying their rights to have sporting, recreational or play time<sup>30</sup>, thus affecting their healthy social-emotional development. This will be important if the plan is to maximise the potential benefits of these activities for all children and young people.

<p><b>Recommendation 29:</b> I recommend that the Council consider SPARC Sport and Recreation New Zealand's document <i>It's All About Children and Young People: Implementing a child/young person centred philosophy in sport and recreation</i> when developing its Youth in Sport and Recreation Plan.</p>
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<p><b>Recommendation 30:</b> I recommend that the Council change the name of this Plan to better reflect its intention to provide sport and recreation opportunities for all children and young people by re-naming it a Children and Youth in Sport and Recreation Action Plan.</p>
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<p><b>Recommendation 31:</b> I recommend the previously mentioned Child and Youth Co-ordinating mechanism be involved in the development of this Action Plan to ensure alignment with other plans, policies and strategies relating to children and young people.</p>
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<p><b>Recommendation 32:</b> I recommend that the Council particularly consider the needs and socio-economic barriers for children and young people from high deprivation areas.</p>
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<p><b>Recommendation 33:</b> I recommend that the Council consult with children and young people when developing and implementing the Youth in Sport and Recreation Action Plan.</p>
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## PART G: ENTRY FEE INTO LOCAL SWIMMING POOLS

### Entry fee to local swimming pools

<sup>29</sup> SPARC. *Its all About Children and Young People: Implementing a child/young person centred philosophy in sport and recreation*, April 2007, p. 2

<sup>30</sup> Article 31 of UNCROC states that children have the right to relax and play, and to join in a wide range of cultural, artistic and other recreational activities.

62. At present there are a range of different charges for the 24 pools across Auckland and those in the former Manukau City Council area are currently free. The *Draft LTP* seeks feedback on entry fee to local swimming pools. Four options are being considered:

1. Status quo. Continued free access to six swimming pools in the former Manukau City Council area. Current charges at the remaining 18 pools. No cost impact to council. This option is the one currently included in the draft LTP budgets.
2. Universal free access to all council-owned swimming pools during standard opening hours (6am to 6.45pm weekdays and 9am to 6.45pm weekends). Estimated additional annual cost to council: \$5.5 million.
3. Universal free access for all children 16 years and under to all council-owned pools during standard opening hours (as listed in option two). Charges will apply to all adults 17 years and over at all pools including the six swimming pools in the former Manukau City Council area. Estimated annual reduction in costs: \$450,000.
4. Universal user charges to all council-owned pools. A small charge will be introduced at the six pools in the former Manukau City Council area. The status quo will continue at all other 18 pools. Estimated annual reduction in costs: \$2.5 million.

63. Whichever option the Council and Local Boards opt for, it will be important that processes are put in place to monitor, assess and evaluate the impact of entry fees to local swimming on children, young people, their families and wider community. This will provide the Council and Local Boards with information to determine the value of any option chosen and would assist them in future policy and decision-making in relation to this matter.

64. **Recommendation 34:** I recommend that the Council takes guidance from SPARC Sport and Recreation New Zealand's publication *It's All About Children and Young People: Implementing a child/young person centred philosophy in sport and recreation* and UNCROC and take a universal approach to free access for all children and young people 17 years and younger.

**Recommendation 35:** I recommend that the Council monitor, assess and evaluate the impact this policy has on children, young people and their families. Such a review would provide evidence to inform future decisions regarding entry fee in local swimming pools.

## PART H: PROPOSED CHANGES TO COMET

65. COMET is a council-controlled organisation that was established by the former

Manukau City Council to advance education and educational opportunities for the Manukau community.

66. The draft LTP 2012-2022 proposes that the existing COMET trust be resettled into a new trust and that this new trust would undertake the same activities that are currently performed by COMET, but it would be able to operate throughout the Auckland region.

67. **Recommendation 36:** I support the preferred option outlined in the *Draft Long-Term Plan* that the existing COMET trust be resettled into a new trust and that this new trust would undertake the same activities that are currently performed by COMET, but it would be able to operate throughout the Auckland region.

68. **Recommendation 37:** I recommend that the new trust establish processes and mechanisms for engaging with children and young people to help inform and guide their work.

## PART I: THE SOUTHERN INITIATIVE

69. I support the Council's vision in embarking on the Southern Initiative as a way of improving on the social and economic circumstances that impact a large proportion of children and their families living in this region. In particular, I welcome the focus on improving early childhood learning, raising youth educational achievement and creating opportunities for youth employment, as I consider this will help improve their overall social wellbeing and reduce inequalities.
70. The draft LTP 2012-2022 signals \$1.8 million of funding over 10 years to facilitate and co-ordinate the many stakeholders, including government agencies, charities and community groups that are active in the area. Additional funding is also provided to urgently improve public transport in the area. Many other existing programmes that were developed over time by the former councils in conjunction with their stakeholders in Southern Auckland have also been included in this draft LTP 2012-2022.
71. While I support the Southern Initiative as a priority, I do ask the Council that they also ensure that initiatives to improve children and young people's wellbeing are not merely localized to the Southern Initiative but are implemented in all areas of Auckland where there are issues of child poverty and associated underachievement.

## Conclusion

72. In conclusion, as an emerging international city, it is appropriate that Auckland focuses on the future and makes provision for it. Placing children and young people at the centre of policy and planning for the next generation requires forward-looking planning and socially and environmentally sustainable policies. A child-friendly city benefits all of society, not just the youngest generation, helping to 'future-proof' the city and promoting vibrancy and a sense of community<sup>31</sup>.
73. I commend the Council on their commitment and leadership to date to improving outcomes for Auckland's children and young people. I am pleased to see that the Council has prioritised a number of initiatives which have the potential to positively impact on children and young. I would, however, like to see more evidence in the *Draft Long-Term Plan* of the Council, Local Boards and CCOs taking an integrated and strategic approach to prioritising the interests and well-being of children and young people.
74. I strongly endorse the international frameworks established under UNCROC and the UNICEF Child Friendly Cities initiative and recommend that the Council utilize these frameworks to assist them in realising their strategic goals in relation to children and young people.
75. It will be particularly important for the Auckland Council to co-ordinate effectively with central government at both policy and service delivery levels. Although Council has no control over the delivery of core central government services, which are integral to the well-being of children and young people in the Auckland region, both local and central government share the same commitments towards children under the United Nations Convention on the Rights of the Child<sup>32</sup>. This shared commitment can be utilised to align strategies, processes and roles creating an integrated context to improve educational outcomes, decrease poverty and hardship and improve social outcomes, employment, economic opportunity and quality of life.
76. Thank you for the opportunity to submit on the *Draft Long-Term*. I am happy to offer the involvement and assistance of my Office to help develop this work and seek the opportunity to meet with you to discuss this further. If you require further information, please contact my Senior Advisor, Michelle Egan-Bitran on (09) 3746100 or at [m.egan-bitran@occ.org.nz](mailto:m.egan-bitran@occ.org.nz).



Dr Russell Wills  
Children's Commissioner

## APPENDIX 1: CHECKLIST DEVELOPED BY METROPOLITAN AUTHORITIES IN

<sup>31</sup> R Kearns, University of Auckland, *Enlarging a view of children and well-being in our cities, presentation to Waitakere City*, 30 October 2008

<sup>32</sup> The New Zealand Government ratified UNCROC in 1993 and, in doing so, agreed to bring New Zealand's laws and policies into line with its provisions and principles. The provisions of UNCROC also apply to the functions of local government authorities who wield delegated authority from the Crown through legislation. In their recent Concluding Observations on New Zealand, the UN Committee on the Rights of the Child recommended the development of comprehensive policies, co-ordination mechanisms, child-specific budgetary mechanisms and systematic training programmes in order to progress the Convention's implementation.

## LONDON

### Association of Metropolitan Authorities and Children's Rights Office (1995)

#### Checklist for Children

Answer the following questions in relation to all local authority policy and planning proposals.

In answering the questions give specific examples, avoid general statements, do not answer only 'yes' or 'no', and if the question is not seen as relevant explain exactly why.

**1. What *input* have children and young people of different ages had in the process of drawing up the proposals?**

**2. What provision is there for ensuring the *views of children and young people* who might be affected are sought and taken into account at all stages of the implementation of the proposals?**

**3. In what way do the proposals tackle *disadvantage and deprivation* faced by children suffering the effects of:**

- poverty
- racism
- disability
- being unable to live with their own families
- homelessness
- refugee status
- rural isolation
- caring responsibilities
- family breakdown
- violence
- not receiving education

**4. In what ways do the proposals promote and protect the *health and welfare* of children and young people of different ages, i.e.:**

- birth – 4 years old?
- 5–7 years old?
- 8–12 years old?
- 13–15 years old?
- 16–17 years old?

**5. What standards are to be followed relating to safety, staffing and supervision?**

How are these standards to be implemented and monitored? The proposals could:

- specify exactly which guidance and standards are being followed;
- specify process through which standards will be monitored;
- explain why, if guidance or other recognised standards exist but are not being followed, this is so.

**6. How do the proposals address what support is being offered to parents to ensure they can provide their children with an adequate standard of living, help them bring up their children and prevent the possibility of family breakdown, including:**

- material support
- social support
- information and advice

- training in parenting skills

**7. How do the proposals ensure that there are more opportunities for disabled children and young people to take an active part in local activities?**

- Have children and their families been consulted about their specific needs?
- Are plans for integrated service provision included and properly resourced?
- Do proposals take into account the different needs of children and young people with different physical disabilities and learning difficulties?
- Do proposals take into account the different needs of disabled children of different ages?

**8. In what way do the proposals offer support to children and young people in exercising their rights to:**

- freedom of expression
- freedom of thought, conscience and religion
- freedom of assembly and peaceful gatherings
- privacy and confidentiality
- practise their own culture, religion and language
- have access to information which enhances their education and development

**9. How do the proposals enhance the protection you offer children and young people of all ages against:**

- physical and mental violence
- sexual abuse or exploitation
- exploitation in employment
- drug abuse
- restriction of liberty

**10. In what ways do the proposals contribute to ensuring that all children and young people have access to:**

- good schools and education which meet their individual needs;
- good quality, appropriate, accessible health care services;
- play, leisure and cultural facilities which meet their own expressed needs.

**11. In what ways does your agency ensure that the service structure reflects the needs of children and their families in terms of:**

- planning
- resources
- discussion
- inter-agency working
- methods of decision-making