



Kummissarju ghat-Tfal

Commissioner for Children

# From Rights to Reality

An Interim Report (2018-2020) on the  
Implementation of the National Children's Policy





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*The Office of the Commissioner for Children was set up in terms of the Commissioner for Children Act of 2003, to promote the welfare of children and the compliance with the UN Convention on the Rights of the Child, as ratified by Malta, and such other international treaties, conventions or agreements relating to children as are or may be ratified or otherwise acceded to by Malta.*

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# Message from the Commissioner

PAULINE MICELI



Looking back in time, I remember clearly a great sense of longing, hype and expectation about 2020. As Commissioner for Children, the significance of this year for me lay in the fact that it marked the thirtieth anniversary of Malta's ratification of the United Nations Convention on the Rights of the Child.

As we all know, the festive and hopeful spirit with which we had waited for this year to arrive gave way to the anguish and despair caused by the covid-19 pandemic. Likewise, any plans to celebrate this milestone anniversary of Malta's accession to the world's foremost charter of children's rights were swept aside by more practical and urgent concerns about the health, education and overall well-being of children in these troubled times.

Sad as we feel about the missed chance to celebrate this anniversary, let us remember that its real significance is not in the genesis of the historical event but in the epigenesis of what has happened since then. While Malta's becoming of State Party to the Convention, thereby committing to do everything in its power to respect and promote the rights of children in its jurisdiction, was a seminal achievement for our country, I think it is much more constructive to reflect critically and without complacency on what we have actually reaped over these three decades.

Examining the harvest from thirty years of children's rights in Malta, the legal and organisational constitution of the Office of the Commissioner for Children in 2003 and the launch of the National Children's Policy in 2017 stand out as among the most important elements, the former as a catalyst and the latter as a tool, in the promotion of children's rights in our country.

In 2020, despite or perhaps because of the unrest and uncertainty created by the pandemic, the time is ripe to bring these two elements together in this report in which my Office takes a critical look at the National Children's Policy as a tool for advancing children's rights, looks back at how it has been used in the course of the past three years, and looks forward to how it can and should be used over the remainder of the Policy's cycle to improve the lives of children in Malta.

Like the National Children's Policy, this implementation report is a tool, a tool for inviting stakeholders to reflect critically on their work in terms of how they can make it more effective for children, for encouraging children to expect and demand more and better from persons in authority, and for rekindling that vital hope dimmed by the pandemic in the fundamental beauty and power of universal children's rights.



# Executive Summary

This report is a mid-cycle review of the National Children's Policy that offers a critical analysis of three distinct but complementary aspects of the Policy: i) its inherent ability to further the implementation of the United Nations Convention on the Rights of the Child; ii) the progress accomplished, and iii) the progress that remains to be achieved in the implementation of the Policy for each of the Policy's five dimensions.

Viz-a-vis the first aspect, the report identifies a number of shortcomings in the internal and external structure of the Policy, chiefly the fact that it provides for a structure to monitor and evaluate the implementation of the Policy but not for a structure to steer the implementation of the Policy; and the fact that, three years on from the publication and launch of the Policy, a strategy with clear and adequate targets, timeframes and resources for the implementation of the Policy has not been formulated.

The report describes progress in the sections under: **Home Environment**, care and upbringing of children, including and especially children with particular vulnerabilities, both in its structure (e.g. increased investment in social and affordable housing) and content (e.g. implementation of the National Strategic Policy for Positive Parenting 2016-2024); **Social Well-Being**, provision (e.g. drug rehabilitation centre for children), protection (e.g. enactment and coming into force of the Minor Protection (Alternative care) Act) and participation of children (e.g. full voting rights for young people aged 16-17); **Health and Environment**, prevention and early intervention (e.g. screening of children for various developmental problems), management of health problems (e.g. building of new or the modernisation of existing health centres), mental health (e.g. launch of a national Mental Health Strategy); **Education and Employment**, access to education (e.g. the building of new or the modernisation of existing schools), quality of education (e.g. updated standards for child day care), psycho-social support to students (e.g. the availability of psycho-social teams in all State colleges); and **Leisure and Culture**, provision of opportunities for children's play (e.g. revised national standards for public playgrounds), sports (e.g. implementation of national strategy for sports) and culture ((e.g. implementation of national strategy for culture).

The report calls for further action through, for example, under **Home Environment**, more flexible work arrangements for parents and the importance of children having a positive upbringing; under **Social Well-Being**, incorporation of the principle the best interests of the child in all relevant legislation, the setting up of the necessary structures for the full implementation of the Minor Protection (Alternative care) Act, and ratification of the 3rd Optional Protocol to the Convention; under **Health and Environment**, setting up of an authority to regulate fun parks and luna parks, an updated Sexual Health Policy and Strategy and a new service to address problematic use and overuse of the internet; under **Education and Employment**, the reform and enactment legislation governing the education system in Malta and better utilisation of technology inside and outside classrooms; and under **Leisure and Culture**, legal enforcement of all safety standards for play structures and extension and adoption of regulations for traditional media to social media.





# Introduction

The present report respects the mandate given to the Office of the Commissioner for Children in the conclusion to the National Children's Policy, which reads that the Office "shall be monitoring, evaluating and reporting upon the progress achieved under the different dimensions of the Policy."

The fact that the publication of this report dates around the chronological midpoint of the 2017-2024 cycle of the Policy attests to the report's dual purpose to provide an account of the progress registered thus far in the implementation of the Policy, and, more importantly, to create awareness and a sense of urgency among stakeholders around the progress that is yet to be achieved towards the Policy's aims and objectives.

The historical purpose of the report has been fulfilled through the Office's constant monitoring of the implementation of the Policy since the latter's launch in 2017. Through an in-depth evaluation of what was implemented from the Policy, the Office has also realised the more activist and advocacy purpose of the report and its mandate as expressed in the Conclusion to the Policy and in its very own law, the Commissioner for Children Act.

The report takes a dynamic view of the Policy as a document that is not cast in stone but is shaped by the changing forces of context and criticism (Chapter 1) into a tool for the implementation of the rights of children.

The report presents the output from the Office's monitoring and evaluating activity at an intermediate level between the policy dimension and the policy objectives by grouping the latter into a small number of thematic clusters under the relevant policy dimension (Chapter 2).

In monitoring the implementation of the Policy (Chapter 3), the Office has relied mainly on budgetary measures by analysing their content in relation to the objectives of the Policy and then tracking their implementation. The Office has also relied on feedback received from children themselves and other key stakeholders.

Since the Policy is intended to bring added value to the implementation of children's rights, this report does not consider those measures that were in place before the Policy was launched, even though they undoubtedly complement and are complemented by the newer measures that came into being since and possibly thanks to the launch of the Policy.

In evaluating the implementation of the Policy (Chapter 4), the report assesses the progress made against the stated objectives of the Policy and against its own recommendations and those made by various national and international stakeholders which the Office makes its own, notably the Office of the Commissioner for Children, groups of children consulted by the Office through a round of workshops, held in Primary and Secondary State, Church and Independent Schools, that also used a child-friendly version of the Policy, and the Committee on the Rights of the Child in its Concluding Observations to its Consideration of Malta's latest State Report. The evaluation is presented in the form of recommendations of directions that future policy implementation efforts should take.



# 1

# Critical analysis of the National Children's Policy as a tool for implementing the UN Convention on the Rights of the Child

## I. Background

The National Children's Policy is an offspring of the United Nations Convention on the Rights of the Child. Like the Convention, the Policy places children at the very centre of its focus. This means that: i) the aims and principles of the Policy are framed and articulated in terms of children's fundamental rights, and that: ii) the Policy takes a holistic and comprehensive view of children, addressing the full gamut of their needs and specificities.

The Policy partakes not only of the philosophy and rationale of the Convention but also of its power to bring about positive change in the lives of children. At present, the leverage of the Convention on Malta's political landscape rests on the fact that Malta is a State Party to the Convention. This status renders the Government of Malta answerable to the Committee on the Rights of the Child for its actions towards the full realization of the rights of children in Malta. In order to further strengthen Malta's commitment to children's rights, the present administration has pledged to incorporate the Convention in national legislation, thus giving all of the rights contained in the Convention the force of law. To this end, a bill is due to be presented in Parliament in the coming months.

The Policy harnesses the power of the Convention by proposing public policy actions that can bring children in Malta closer to the enjoyment of their fundamental rights as children. The Policy should thus be seen as a tool for implementing the Convention. In this sense, it complements the aforesaid incorporation of the Convention in the Maltese legal order. The fact that it is the first document of its kind is further evidence of a drive to give practical and tangible significance to the rights of children in Malta.

### ***Recommendations***

- Expedite the process leading to the full and direct incorporation of the UNCRC into Maltese law.

## II. Process

In drafting the Policy, the input of a wide range of children (aged 4-17) was sought, analysed and taken on board. Hence the rights and spirit of the Convention can be said to inform not just the content of the Policy but also the process leading up to its publication, specifically Article 12, which calls on all who take decisions on behalf of children to listen and give due weight to the views of children. In addition, a child-friendly version of the Policy, penned in the form of an adventure story, was completed, published and disseminated to children by the Office of the Commissioner for Children.

The Policy was published and launched in late 2017. Malta's first ever National Children's Policy post-dates the country's accession to the Convention by almost thirty years. This means that a whole generation of children failed to benefit from its added value. Apart from its delayed delivery, the Policy was also plagued by a difficult and delayed gestation with the first draft of the policy published in 2011 (six years before its final publication) and inadequate synergy and coordination between the various public officials who followed one another at the helm of the drafting process.

### **Recommendations**

- Set up a permanent committee tasked with updating the National Children's Policy. The committee should be made up of recognised experts in child well-being as well as children, and should be coordinated and steered by the directorate responsible for Policy within the ministry responsible for children's rights.

## III. Content

In trying to encompass the breadth of children's rights in all its fullness and continuity, the Policy posits five concentric and child-centred dimensions which cut across traditional sectoral divisions. At the heart of this order lies the child's right to a home environment, surrounded in progressively wider circles by the child's right to social well-being, to health and environment, to education and employment, and to leisure and culture.

This division should not be seen merely as a literary representation of child well-being but as a practical model that can highlight the position and role of every single stakeholder in the system of child well-being. Such clarity should help to give the actions of all stakeholders a more child-centred and child-focused edge, and to invite them to think critically about how their work can be made more effective for children and how they can work together in the best interests of children beyond organisational or cultural boundaries.

The necessary synergy and unity between the five dimensions of the Policy is sometimes obscured by an excessive conceptual overlap between them. For example, the dimension of social well-being is so broad in its conceptual reach as to subsume or be subsumed by the other dimensions.

Despite its breadth, the Policy is not free of certain ideological biases, such as in framing the internet and children's use of it in predominantly negative terms thus overlooking its potential as a force for good. This force has been brought into action by the pandemic as schools closed down for several months, enabling children to continue their education, albeit not without difficulties for and disparities between children.

The policy objectives do not always reflect the full thematic scope of the policy dimensions, as articulated in the text supporting and preceding the objectives. For instance, in the dimension of **Education & Employment**, while the description of the policy dimension touches upon the need to ensure that work performed by minors in employment is safe for them, there is no corresponding text in the objectives. This means that this key component of child well-being is not set as a policy objective which the relevant stakeholders will strive to advance for the benefit of the scores of children who do paid work alongside or after compulsory education.

#### **Recommendations**

- Articulate a clearer definition of the scope of each policy dimension and the synergies between the dimensions.
- Ensure that the policy dimensions are informed by a balanced and nuanced perspective on all the things that make up the lives of children.
- Ensure that all the thematic aspects identified in the description of each policy dimension are reflected in the policy objectives.

## **IV. Method**

In trying to chart a path towards the realisation of children's rights, the Policy adopts a descriptive over a prescriptive approach. This means that within each policy dimension the Policy does not prescribe specific measures but describes general policy objectives. While this may be seen as weakening the Policy's ability to bring about concrete change, it can also be seen as favouring a bottom-up approach, where responsibility for deciding what action is needed is placed in the hands of the individual stakeholders, over a top-down approach, where a central entity strategizes on issues in respect of which it may have insufficient direct experience or expertise. This descriptive bottom-up approach thus makes the Policy flexible and adaptable to changing circumstances. (see Context)

Above all, the Policy fails to give stakeholders a clear picture of where we stand before implementation, in terms of quantifiable indicators of de facto child well-being, and where we want to be standing after implementation, in the form of measurable targets of increased well-being for children. This lack of present and future coordinates makes it hard for stakeholders who are responsible for implementing the Policy to calibrate their efforts to do more and better than what they are already doing. The risk is that whatever is done in implementation of the Policy would have been done even without the Policy, so that the utility of the Policy would be simply as a tool for tracking progress, not for catalysing it.

Apart from failing to indicate where as a country we want to be standing in terms of the well-being of children after the implementation of the Policy, the latter is unclear also on when this should happen. The only date quoted in the Policy document in relation to the Policy is that of its publication, 2017, but there is no date that provides closure to the period of implementation of the Policy.

#### ***Recommendations***

- Develop, on the basis of the National Children's Policy, a strategy with clear objectives and coordinated plans of action for the implementation of the Convention, and allocate adequate human, technical and financial resources for their implementation, monitoring and evaluation.
- In addition, endow such a strategy with objective and quantifiable indicators and ambitious and realistic targets that provide a clear vision of where Malta stands and where it wants to go in terms of children's rights in its jurisdiction.
- Set up a budgeting process that includes a child rights perspective, specifies clear allocations to children, and includes specific indicators and a tracking system to monitor and evaluate the adequacy, efficacy and equitability of the distribution of resources allocated for the implementation of the Convention.

## **V. Governance**

In its concluding remarks, the Policy rightly highlights the importance of investment in children, the need for commitment, coordination and partnership between the relevant stakeholders and the value of empowerment of children as vital components for the successful implementation and outcome of the Policy. However, the Policy fails to identify or establish a focal point by way of an ad hoc or already existing body that is tasked with prompting the optimal functioning of these three components both individually and in synergy by inviting stakeholders to reflect on what they are doing with a view to doing more and better for children.

#### ***Recommendations***

- Set up a steering body for the implementation of the Policy within the Ministry responsible for children's rights by providing it with a clear mandate and adequate human, technical and financial resources to coordinate all activities related to the implementation of the Convention at the cross-sectoral, national, regional and local levels. This can take the form of a Parliamentary Secretary for Children's Rights who would be appointed within the said Ministry to coordinate the implementation of the UNCRC, to carry out Children's Rights Impact Assessments for policies and legislation that directly or indirectly affect children, and to develop a budgeting process with a children's rights perspective.



## VI. Context

The overall climate in which the Policy was launched in late 2017 and subsequently navigated was positive. On a political and institutional level, an increased sensitivity within EU institutions and member states to issues of rule of law together with a rediscovered focus on children's rights, as shown by the plans of the new EU Commission to develop an EU strategy on children's rights, have provided a favourable backdrop to the implementation of the Policy.

On an economic level, robust economic growth in the years immediately preceding and following the launch of the Policy<sup>1</sup> also favoured the implementation of the Policy. This positive economic climate changed dramatically for the worse in the first quarter of 2020 when the covid-19 pandemic hit Malta, precipitating an economic slowdown<sup>2</sup> that forced the Government to drastically increase public spending to keep the economy, and with it the lives and livelihood of many families, afloat. This crisis meant that some services, including services directly or indirectly benefiting children, had to be scaled down, put on hold or go online as people reduced their spending and out-of-home activities.

An economic and social forecast is very uncertain as the spread of covid-19 shows no sign of subsiding and a cure or vaccine against the virus remains elusive. Some experts have claimed that the new virus is here to stay and that the drastic changes it has forced us to make to our lifestyles may not be fully reversible. This means that we cannot hope or assume that the efforts and sacrifices that children and the people who sustain their well-being have had to make to adapt to this new normal are temporary. This forces all stakeholders to think and act not within a mindset of resistance to and survival of an emergency but to embrace a new paradigm characterised by new challenges and opportunities. It is according to this new paradigm that policymaking for and investment in children must be rethought so that the ultimate aims of the Policy can still be reached.

### Recommendations

- Carry out a Child Rights Impact Assessment into the ongoing impact of the covid-19 pandemic on children and into how children are coping with such impact. Evaluate the measures in place to continue to ensure that children's rights are being respected.
- Ensure the rights and best interests of children are a primary consideration ever public.

<sup>1</sup> GDP grew by 6.6% in 2018 and 4.4% in 2019 (NSO, News Release 8 March 2019, [https://nso.gov.mt/en/News\\_Releases/View\\_by\\_Unit/Unit\\_A1/National\\_Accounts/Documents/2019/News2019\\_038.pdf](https://nso.gov.mt/en/News_Releases/View_by_Unit/Unit_A1/National_Accounts/Documents/2019/News2019_038.pdf); NSO, News Release 28 February 2020, [https://nso.gov.mt/en/News\\_Releases/Documents/2020/02/News2020\\_034.pdf](https://nso.gov.mt/en/News_Releases/Documents/2020/02/News2020_034.pdf))

<sup>2</sup> GDP shrank by 16.2% in 2020 with previously low unemployment rising sharply (NSO, News Release 28 August 2020, [https://nso.gov.mt/en/News\\_Releases/Documents/2020/08/News2020\\_142.pdf](https://nso.gov.mt/en/News_Releases/Documents/2020/08/News2020_142.pdf); NSO, News Release 30 September 2020, [https://nso.gov.mt/en/News\\_Releases/Documents/2020/09/News2020\\_156.pdf](https://nso.gov.mt/en/News_Releases/Documents/2020/09/News2020_156.pdf))





# 2

## Grouping of policy objectives into thematic clusters

The **Home Environment** policy dimension consists of 11 policy objectives (POs). These can be grouped in 3 broad categories:

1. Structure of care and upbringing of children, i.e. housing, income, work-life balance (POs 3, 6, 8)
2. Content of care and upbringing of children, i.e. positive parenting (POs 1-2, 4-5, 7)
3. Additional support for families facing particular challenges (POs 9-11)

The **Social Well-being** policy dimension consists of 34 policy objectives. These can be grouped in 4 broad categories:

1. Provision to children (POs 1-3, 27-32, 34)
2. Protection of children (POs 9-10, 12-17, 19-21, 23-26)
3. Participation of children (POs 5-8, 18, 33)
4. Awareness and knowledge of children's rights and needs (POs 4, 11, 22)

The **Health and Environment** policy dimension consists of 17 policy objectives. These can be grouped in 3 broad categories:

1. Early Intervention & Prevention (POs 2-5, 10, 12, 15-17)
2. Management of health conditions in children (POs 1, 6, 8, 9, 14)
3. Mental Health (POs 7, 11, 13)

The **Education and Employment** policy dimension consists of 32 policy objectives. These can be grouped in 5 broad categories:

1. Accessibility of education (POs 1, 5, 7-9, 27, 29-30)
2. Quality of education (POs 1, 10-19, 26, 28)
3. Early years education of children (POs 4-6)
4. Late years education of children (POs 28, 31-32)
5. Non-academic support for students (POs 2-3, 20-25)

The **Leisure and Culture** policy dimension consists of 16 policy objectives. These can be grouped in 3 broad categories:

1. Leisure (POs 1, 3-5, 7-8, 11, 13-15)
2. Sport (POs 1, 6)
3. Culture (POs 1-2, 9-10, 12, 16)



# 3

## Monitoring of the Implementation of the National Children's Policy

### I. Home Environment

In terms of the **structure of care and upbringing of children**, i.e. income, housing, work-life balance, progress was made in a(n)/the:

- Increase in children's allowance and a tax refund for parents
- Introduction of a bonus for newborn or newly adopted children
- Receipt of financial aid by prospective adoptive parents in the form of a lump sum to cover the costs of the adoption process
- Receipt of financial aid by foster parents in the form of increases in the weekly allowance
- €50 million investment in the building of nearly 700 additional social housing units
- Funding for embellishment works and installation of lifts in 109 social housing apartment blocks
- Raising of income bracket for affordable housing for a couple with two children to €32,000
- Plans to publish a White Paper on affordable housing
- Additional days of leave for working parents

In terms of the **content of care and upbringing of children**, i.e. positive parenting, progress was made in a(n)/the:

- Implementation of the National Strategic Policy for Positive Parenting 2016-2024 by way of:
  - setting up of a Task Force to steer the implementation of the Strategic Policy
  - setting up of a Child Advisory Group to get the perspective of children
  - multimedia awareness campaigns
  - plans for a pilot project by which Perinatal psychiatrists will carry out screening for postnatal depression and similar disorders.
  - plans for training of therapists as part of 'Parents as Partners', a train-the-trainer programme run by Tavistock University
- Launch of guidelines and social regulatory standards on the adoption of children
- Launch of the 'National Adoption Strategy for Children and their Families (2018-2022)

In terms of **additional support for families facing particular challenges**, progress was made in a(n)/the:

- Additional financial assistance to parents of disabled children
- €300 carer grant for parents who are forced to stop working in order to take care of a differently abled child over the age of 16 years

- Increase by €5 per week of the children's disability allowance from which circa 1,400 children stand to benefit
- Receipt of disability assistance by people with hearing or speech impediments aged 16+
- Launch of 'Sens-ability', a scheme to enhance well-being for children with autism by creating a sensory room within their home

## II. Social Well-being

In terms of the **provision of social well-being to children**, progress was made in a(n)/the:

- Launch of standards and guidelines for residential out-of-home care for children
- Plans for the setting up a safe centre for female children with behavioural difficulties that is to be run by the Foundation for Social Welfare Services
- Establishment of a partnership between the Ministry for the Family, Children's Rights and Social Solidarity and Caritas Malta for the setting up of a drug rehabilitation centre offering residential and day services to young people under 18 with drug addiction problems and support to their families, this should be fully operational by 2021

In terms of the **protection of children's social well-being**, progress was made in a(n)/the:

- Strengthening of the legal framework of child protection through the coming into force of the Minor Protection (Alternative care) Act, which inter alia incorporates the principle of the best interests of the child
- Further development of the 179 helpline by the Foundation for Social Welfare Services
- Setting up of a new section within the Commission for the Rights of Persons with Disability to ensure that the rights and interests of disabled persons and their families are safeguarded
- Combating child poverty through increased social benefits:
  - increase of €3.49 per week in social benefits to compensate for an increase in the cost of living
  - additional bonus of €35 for more-than-one-person families as an adjustment to the cost of living adjustment
  - tax refund for those who are employed, with those with the lowest income getting the highest reimbursement
  - first 100 hours of overtime taxed at 15% for those who do not earn more than €20,000
  - entitlement of widowed pensioners with children under 18 to a weekly allowance of €4.54 if they work and €9.32 if they do not work.
- and enhanced eligibility to social benefits:
  - in-work benefit to increase from €350 to €450 in cases where only one parent works so that incentive remains for second parent to work
  - children who have lost their parents receive the whole allowance irrespective of if they work
  - entitlement of widowers with children under the age of 25, who work and receive a contributory pension at the same time to sickness benefits
  - unconditional entitlement to free medication for parents in receipt of maintenance

In terms of **participation of children in their social well-being**, progress was made in a(n)/the:

- Extension of voting rights to young people aged 16 and over for all the State, Local and European elections and referendums
- Commitment to strengthen the Youth Parliament by encouraging more young people to participate
- Launch of a Draft Youth Policy (2021 - 2030) for consultation, particularly with young people, one of the 6 strategic goals of which is to listen and support the voices of young people
- Participation of Malta in a project by the Council of Europe to gauge the extent of children's participation in social and political life at the different levels of society

In terms of **awareness and knowledge of children's rights and needs**, progress was made in a(n)/the:

- Publication and launch of 'A Passage to Malta, a Research Study on the Health and Wellbeing of Foreign Children in Malta' by the Office of the Commissioner for Children
- Commissioning of a study by the Commissioner for Children to probe children's views and aspirations in respect of the built urban environment and test how these can be put in practice in the form of a pilot project in a select locality in Malta

### III. Health and Environment

In terms of **Prevention & Early Intervention**, progress was made in a(n)/the:

- Amendments to the Embryo Protection Act that provide for the right of children born through assisted reproduction technologies to have access to information about their origins
- Implementation of the National Breastfeeding Policy and Action Plan (2015 - 2020)
- Introduction of the Pneumococcus vaccine on the National vaccine programme
- Signing of a preliminary agreement to screen children aged 0 to 16 for physical, intellectual and psychosocial developmental problems
- Plan to carry out a research study to look at the rate of obesity in children between the ages of 4 and 5 and to provide evidence for a set of recommendations for sustaining a healthy lifestyle for children
- Plans to launch a policy on physical activity
- Launch of the National Alcohol Policy (2018 - 2023)
- Plans to roll out a strong educational campaign amongst school age students regarding cannabis use
- Plans to carry out an exercise that will lead to the closing of certain squares and main roads to traffic on certain days.
- Various outreach sessions in primary schools by the Malta Road Safety Council on various aspects of road safety

In terms of **management of health conditions in children**, progress was made in a(n)/the:

- Opening of a local health centre and a regional health centre in Kirkop and Paola respectively, planned opening of a care centre in Gozo, and the refurbishment of existing health centres, notably the one in Gżira
- Plans to launch an updated policy on sexual health
- Additional social security contributions for parents of children with rare illnesses
- Setting up of a specialised clinic at the Marsa Primary School that will provide Sensory Integration Therapy to children who are not able to fully participate within the educational system, e.g. children with autism

In terms of the **mental health of children**, progress was made in a(n)/the:

- Launch of the Mental Health Strategy covering the period 2020-2030, which includes specific provisions for children
- Planned allocation of new and more appropriate premises to the Children and Young Persons Services

#### IV. Education and Employment

In terms of the **accessibility of education**, progress was made in a(n)/the:

- Drafting of a new Education Act that grants greater autonomy to individual State colleges and schools
- Opening of a new schools in Qawra, which hosts a large migrant population, and a new school in Marsascala, and the continuation of building works on new schools in Msida and Victoria
- Completed or planned refurbishment, maintenance and/or improvements of several State schools
- Plans to carry out a comparative analysis between current methodology and that adopted by the EU in the measurement of the rate of Early School Leavers with the aim of compiling statistics to reflect the current situation, and drawing up recommendations on what can be done to retain students in the educational system
- Yearly upward adjustment of stipends to the cost of living for children in higher secondary education
- Removal of SEC exam fees
- Introduction of universal free school transport
- Extension of Migrant Learners' Unit hub to secondary school students
- Plans to equip more State Colleges with multi-sensory rooms
- Planned launch of the first national strategy and action plan for integration and gender equality in various sectors, including education



In terms of the **quality of education**, progress was made in a(n)/the:

- Drafting of a new Education Act that grants greater autonomy and clout to the regulator
- Creation of a Learning Outcomes Framework to support the National Curriculum Framework
- Rollout of the second phase of 'My Journey', whereby students will be able to choose programmes that are more relevant to them depending on their abilities
- Planned investment to set up laboratories and new workshops in at least 9 vocational subjects
- Planned strengthening of foreign language learning
- Phasing out of mid-yearly exams in State schools and their replacement by continuous assessment in order to reduce stress for students and promote their holistic wellbeing
- Planned rollout of a pilot project for the introduction of tablets in Middle schools
- Increase in the number of schools in which Ethics is offered as a subject
- Plans to open more Klabb 3-16 centres
- Increased budget allocation to the Culture Pass, which gives children the right to experience at least one cultural activity a year through their school and in this way, participate actively in arts and culture
- Plans for an educational campaign amongst students in Primary Schools and their parents on the importance of maintaining a healthy balanced diet

In terms of **Early Years Education**, progress was made in a(n)/the:

- Updating of the National Standards for Child Day Care Facility in line with ongoing research in Early Childhood Education & Care (ECEC) theory and practice for children aged 0-3 years and recent developments in the ECEC (0-3 years) field within a Maltese context, including the need for night ECEC service provision

In terms of **Late Years Childhood Education**, progress was made in a(n)/the:

- Encouragement of students to choose STEM (Science, Technology, Engineering & Mathematics) subjects
- Continued enhancement of the My Journey reform through approximately 80 workshops to be used to train students in vocational and applied subjects
- Strengthening of ties between secondary education and post-secondary education to encourage students to further their education after turning 16 (this has seen the Institute for Tourism Services register a more than 80% increase in the number of students)
- Plans for a pilot project on the introduction of content related to Artificial Intelligence in education
- Planned implementation of 'Reach Out', a Youth Guarantee service that will support 100 students who abandoned their studies to continue their studies or to find a job
- Plans to set up a consultative National Board for Compulsory Education to create partnerships with industry so that teaching in secondary schools is broadened from the traditional classroom



In terms of **Non-Academic Support to students**, progress was made in a(n)/the:

- Plans to enhance psycho-social services in all colleges and to train educators about psycho-social services
- Nationwide consultation with regards to school uniforms among students attending State schools
- Beginning of the 5th cycle of BeSmartOnline!, co-funded by the European Commission and submission of an application for a subsequent cycle of the project so as to ensure continuation of action
- Plans for a national study to measure the weight of students and that of their bags and the weight of their bags, to issue guidelines regarding the weight of students' school bags, and to reduce the weight of school bags by installing drinking water fountains in all state schools

## V. Leisure and Culture

In terms of **leisure**, progress was registered in a(n)/the:

- Rollout of detached Youth work<sup>3</sup> in 5 localities
- Opening of 2 new youth cafes by Aġenzija Żgħażaġħ in Paola and Qrendi
- Review and launch for public consultation of 'DSM3500 'Public Playgrounds – Requirements for Public Playgrounds Safety, Accessibility, Play-Value and their Management', with new foci on play value of and child participation in the design and upkeep of public playgrounds
- Plans to set up an Adventure Family Park in Kottonera
- National awareness campaign on internet safety amongst children and parents by BesmartOnline!

In terms of **sport**, progress was registered in a(n)/the:

- Beginning of the implementation of the National Strategy for Sports and Physical Activity in Malta
- Launch of 'Achievers', a financial scheme for voluntary organisations to organise activities for children and young people related inter alia to sport

In terms of **culture**, progress was registered in a(n)/the:

- Implementation of the Create 2020 Strategy
- Launch of 'Achievers', a financial scheme for voluntary organisations to organise activities for children and young people related inter alia to culture and music

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<sup>3</sup> This service makes contact with and is available to young people where they gather and congregate – in the street, park, locality – with a view to supporting them in

- gaining knowledge, recognising new opportunities and engaging positively with the world
- around them. Youth workers make contact with and work in environments such as street corners, playgrounds, parks, amusement arcades, shopping centres, cafes etc. Detached youth work
- projects, initiatives and activities take their lead from young people themselves and take
- account of what their needs might be, and establish goals for themselves.

# 4 Evaluation of the Implementation of the National Children's Policy

## I. Home Environment

In terms of the **structure of care and upbringing of children**, i.e. income, housing, work-life balance, the Office of the Commissioner for Children calls for:

- Residential out-of-home care to be sufficiently funded for the optimal care of children
- Children to be provided with a quiet space within the home
- More flexibility for parents who work to be able to spend more quality time with their children, including through remote working arrangements
- Children to be given less responsibility for their siblings and thus more time to play

In terms of the **content of care and upbringing of children**, i.e. positive parenting, the Office of the Commissioner for Children calls for:

- Increased focus of parenting preparation services to prospective parents on broader issues of child development
- Inclusion of parenting in the curriculum of both compulsory and non-compulsory education
- Mainstreaming of positive parenting, including co-parenting in cases where parents are no longer in a relationship, in national law, policy and practice
- Further promotion of positive, non-violent and participatory forms of child-rearing and discipline
- Further encouragement of parents to be encouraged to listen to children, enable them to participate in family decisions and involve them in the work carried out at home
- Promotion of good communication within the family for children to feel comfortable to speak about their problems
- Greater awareness among parents that they should lead children by example
- Increased efforts to end all forms of violence within the home
- Enforcement of prohibition of corporal punishment in all settings, namely in the home, schools, childcare institutions, including early childhood care institutions, and alternative care settings, and in the administration of justice, including through removal of 'reasonable chastisement' as valid grounds for corporal punishment
- Increased efforts to raise the awareness about the harm caused by corporal punishment among parents, professionals working with and for children, and the public in general
- Stronger awareness-raising programmes, including campaigns, on the harmful effects of child marriage and female genital mutilation on the physical and mental health and well-being of children

- Awareness-raising activities on the phenomenon of child sexual abuse including in the home as well as in the online context, and against the stigmatization of victims of sexual exploitation and abuse

In terms of **Providing additional support to families facing particular challenges**, the Office of the Commissioner for Children calls for:

- Additional assistance to families with children with mental health problems, addictions and other vulnerabilities to be considered

## II. Social Well-being

In terms of **provision of children's social well-being**, the Office of the Commissioner for Children calls for:

- Incorporation of the principle of the primacy of the best interests of the child in all legislation that is relevant to and has an impact on children, including the Immigration (Amendment) Act
- Development of criteria for determining the best interests of the child in every area and for giving it due weight as a primary consideration, and training of all relevant persons in authority on how to effectively assess the child's best interests when a decision concerning a particular child is being made
- Enhanced coordination of services within and across sectors in order to create a continuum or network of services that responds easily to the particular, complex and changing needs of individual children
- More and better support for children who are passing through a difficult time
- Comprehensive strategy addressing all forms of discrimination, including discrimination against asylum-seeking, refugee and migrant children, children with disabilities, and children born to unmarried parents, that includes awareness-raising and educational programmes targeting children, families, the general public and faith-based organizations
- Continued review of policies on alternative care for children deprived of their family environment in order to reduce the placement of children in residential care, ensure that the placement is appropriate to meet their needs, siblings are kept together as much as possible and priority is given to community based family units
- Adoption of Occupational Standards for those responsible for the upbringing of children living in residential care
- Children to be removed from the family only as a measure of last resort and only after an appropriate assessment of their best interests and views
- Family-based care for children to be supported and facilitated, and the foster care system for children who cannot stay with their families strengthened
- Development of a framework for the reunification of children, separated from their families, with their families, taking into account the best interests of the child, and provision of psychosocial and economic support to the families where necessary
- Homeless shelters that accept minors who are not being cared for by their parents
- Availability of adequate services for the rehabilitation and reintegration of child victims, such as in the Children's House, together with appropriate compensation schemes

- Prompt prosecution and sanctioning of child trafficking suspects and redress and rehabilitation for each child victim
- Effective investigation of and redress for incidents of surgical and other medical treatment of intersex children without informed consent

In terms of **protection of children's social well-being**, the Office of the Commissioner for Children calls for (the/a):

- Development and use of a Child's Rights Impact Assessment tool in respect of and before any law and policy, budgetary and other administrative decision that directly or indirectly affects children is adopted, in order to embed a child rights-based approach in public decision-making
- Immediate setting up of all the necessary structures, including the necessary human, technical and financial resources, for the child protection system to work in accordance with the requirements of the Minor Protection (Alternative care) Act in order to minimise delays in the issuing of orders by the Court (e.g. appointment of a legal guardian for unaccompanied minors) and ensure the safety of children
- Formulation and implementation of a comprehensive strategy for preventing and combating violence, abuse or neglect against children in all settings
- Allocation of adequate human, technical and financial resources to the Office of the Director Responsible for Child Protection to enable it to follow up on and investigate reports of children suffering harm
- Amendment of the Marriage Act and the Civil Unions Act to remove all exceptions that allow marriage and entering into a civil union under the age of 18 years
- Stronger protection schemes and care programmes for actual and potential victims of child marriage and female genital mutilation.
- Adequate and periodic training sessions on the Convention and the Optional Protocols for all professionals working for and with children, including in identification, referral and protection of potential child victims of early and forced marriage, female genital mutilation and child trafficking
- Integration of a comprehensive child's rights perspective into the next action plan on combating trafficking of children, with particular focus on children in the most vulnerable and marginalized situations
- Review of Victim Referral Mechanisms and Standard Operating Procedures and adequate and coordinated mechanisms to identify and protect child victims of trafficking and sexual exploitation, including systematic and timely information-sharing among relevant officials
- Submission of Malta's report on the implementation of the Optional Protocol on the sale of children, child prostitution and child pornography, in fulfillment of Malta's reporting obligations under this protocol
- Accessible, effective, confidential, child-friendly mechanisms, procedures and guidelines to ensure mandatory reporting and referral of cases of child sexual abuse and exploitation
- Persons who are proven or alleged to have abused children to be prevented and deterred from having contact with children, in particular in their professional capacity
- Transparent and effective investigation of all cases of sexual abuse, the criminal prosecution of alleged perpetrators, and the adequate criminal punishment of those found guilty

- Removal of prescription on sex crimes and other serious offences committed against children
- Independent and impartial commission of inquiry to examine cases of sexual abuse reportedly committed by the religious personnel of the Catholic Church, and the criminal prosecution of alleged perpetrators, and the adequate criminal punishment of those found guilty
- Adequate measures against sexual exploitation of children in the context of travel and tourism
- Ratification of the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families in order to further strengthen the fulfilment of children's rights
- Undelayed authorisation for disembarkation in the nearest place of safety of rescued migrants and refugees, including children, to avoid leaving them stranded at sea, further exacerbating their vulnerabilities
- Non-criminalizing search and rescue operations for refugees and migrants, including children, in respect of their right to seek asylum
- Birth registration of children whose parents do not have personal documents
- Stronger efforts to establish the nationality of children with undetermined citizenship, under the Civil Code and the Maltese Citizenship Act
- Effective and efficient statelessness determination procedure, with an identification and referral mechanism for children who are undocumented and at risk of statelessness
- Accession to the Convention relating to the Status of Stateless Persons, of 1954, and ratification of the Convention on the Reduction of Statelessness, of 1961, the European Convention on Nationality, of 1977, and the Council of Europe Convention on the Avoidance of Statelessness in relation to State Succession, of 2009
- Faster, more multidisciplinary, transparent and independent age-assessment procedure for irregular migrants claiming to be minors, with adequate application of best interest principle, benefit of the doubt to the claimant and appeal mechanisms
- Adequate human, technical and financial resources and independence for the guardianship system for unaccompanied children
- Training of border officials on the rights of the child and in child-sensitive procedures
- Immediate and full involvement of child protection authorities when an unaccompanied or separated child arrives in Malta
- Legal recognition of temporary humanitarian protection status for unaccompanied children, and the rights and benefits attached to it
- Removal of possibility of placing asylum-seeking and refugee children in detention, in accommodation centres for adult asylum seekers as a measure of last resort (Article 14 (1) of the Reception of Asylum Seekers Regulations under the Refugees Act)
- Immediate transfer of asylum-seeking children and their families out of the Initial Reception Facility
- Permanent and sustainable resettlement options for refugees, particularly children and their families
- Facilitation for timely family reunification of children who have been separated from their parents/family members



- More space in reception centres to avoid the detention of Unaccompanied Minors at Safi closed centre
- More privacy of children in reception and open centres by avoiding overcrowding, and better access to adequate age-appropriate facilities in these centres
- Better collaboration with the Office of the United Nations High Commissioner for Refugees (UNHCR) and the United Nations Children's Fund (UNICEF)

In terms of the **participation of children in their social well-being**, the Office of the Commissioner for Children calls for:

- Stronger efforts to ensure respect for the right of all children, including children in vulnerable and marginalized situations, such as children with disabilities, and asylum-seeking, refugee and migrant children, to have their view heard in all matters affecting them, in the family, at schools, in the courts and in all relevant administrative and other processes, and given due weight in accordance with their age and maturity
- Systematic training of professionals working with and for children on hearing and taking into account children's views in all decisions affecting them in accordance with the child's age and maturity
- Adoption and effective implementation of the Council of Europe Child Participation Assessment Tool in order to standardize participation of and consultation with children on issues that affect them
- More child-friendly justice system in respect of children who are involved as victims, perpetrators or witnesses, especially in terms of better legal and operational processes and structures for hearing children
- Full operationalisation of the Children's House concept, by providing the structure with adequate human, technical and financial resources and encouraging courts to make use of it for obtaining testimony from children
- Children between 16 and 18 years of age or those under 16 co-accused with persons older than 16 years of age are tried in the Juvenile Court
- Implementation of existing provisions providing alternatives to deprivation of liberty for children
- Non-judicial measures, such as diversion, mediation and counselling, for children accused of criminal offences, and, wherever possible, promote the use of non-custodial sentences for children, such as probation or community service
- Use of detention of children as a measure of last resort, for the shortest possible period of time, subject to regular review with a view to its withdrawal, in compliance with international standards (including with regard to access to education and health services), and separately from detention of adults
- Rights and participation of children to be placed at the centre of national and international climate change adaptation and mitigation strategies
- Meaningful participation of children in the design and implementation of policies and programmes aimed at achieving all 17 Sustainable Development Goals as far as they concern children

- More independent Office of the Commissioner for Children, through provision of adequate specific and separate human, technical, and financial resources as well as the immunities to effectively carry out its function, including dealing with complaints from or for children in a child-sensitive and expeditious manner
- Ratification of the Optional Protocol to the Convention on the Rights of the Child on a communications procedure

In terms of **awareness and knowledge of children's rights and needs**, the Office of the Commissioner for Children calls for:

- Improved data-collection system for regular collection and analysis of data covering all areas of the Convention and its Optional Protocols, disaggregated by age, sex, disability, ethnic and national origin and socioeconomic background in order to facilitate analysis on the situation of all children, particularly those in situations of vulnerability
- Regular surveys amongst children to evaluate their wellbeing
- Stronger efforts to disseminate information on the Convention and its Optional Protocols, including by conducting awareness-raising programmes, to children, in a child-friendly manner, and to families, the general public, faith-based organizations, legislators and judges
- Awareness-raising programmes, including campaigns, to promote the meaningful and empowered participation of all children within the family, the community and schools, including within student councils, with particular attention to children in vulnerable and marginalized situations
- Establishment of a national database on all cases of violence against or abuse or neglect of children, including cases of domestic violence, and the undertaking of a comprehensive assessment of their extent, causes and nature
- Collection of disaggregated data on sexual abuse of children, and on the number of complaints, prosecutions and convictions
- Organised collection of data on children with disabilities and development, with the participation of organisations of persons with disabilities, including children with disabilities, of an efficient system for disability assessment, which is necessary for putting in place appropriate budgets, policies and programmes for children with disabilities
- Awareness-raising campaigns aimed at government officials, the public and families to combat the stigmatization of and prejudice against children with disabilities and promote a positive image of such children

### III. Health and Environment

In terms of **Prevention & Early Intervention in Health**, the Office of the Commissioner for Children calls for:

- Continued efforts to ensure that children born through assisted reproduction technologies have their best interests taken as a primary consideration, including by providing parents with appropriate counselling and support
- Full implementation of the International Code of Marketing of Breast-milk Substitutes and the Baby-friendly Hospital Initiative

- Updated National Breastfeeding Policy and Action Plan, whose cycle ends this year
- Intensified efforts in raising awareness of healthy nutrition
- Setting up of outdoor gyms in every locality
- Increased focus on combating child obesity by inter alia evaluating and updating the 'A Healthy Weight for Life: A National Strategy for Malta 2012-2020' and the 'Food and Nutrition Policy and Action Plan for Malta 2015-2020'
- Stronger efforts to reduce waste by promoting recycling and reduced use of paper, particularly in schools
- Increased focus on reducing litter in public outdoor spaces by increasing signage warning people not to litter, encouraging people, including children, to pick up litter when they encounter it, and installing more bins in the community in which waste can be separated
- Stronger efforts to stop crime, drugs and fighting in certain areas where they are rife and there is exposure of children to them
- Continued measures to address alcohol, drug and tobacco use among adolescents, including by providing, from an early age and in an interactive and approachable way for children, accurate and objective information and life skills education on preventing substance abuse, and by developing accessible and youth-friendly drug dependence treatment and harm reduction services
- Effective implementation of Malta's regulatory framework on air pollution and immediate implementation of plans to reduce air pollution levels, including the National Air Quality Plan, especially in areas near schools and in residential and congested areas, through increased access to electric cars and protection and planting of trees in urban areas
- Increased efforts to address noise pollution especially around construction sites
- More open spaces in urban areas where children can play, including through the closure of roads to vehicular traffic
- More and better awareness and education campaigns, signage, street lights, traffic lights, and pavements or pedestrian zones (more accessible and better protected) for children to be and feel safe using and crossing roads and walking to school and to encourage non-motorised means of transport, such as bicycles
- More awareness campaigns on the dangers of drink-driving

In terms of the **management of children's health condition**, the Office of the Commissioner for Children calls for:

- More child-friendly waiting areas in hospitals
- Design and rollout of training and protocols to ensure that the medical professional administering the care addresses children in a child-friendly and direct manner (not only through the accompanying parent/guardian)
- Development and implementation of an updated comprehensive sexual and reproductive health policy for adolescents that includes inter alia mandatory sexual and reproductive health education for both adolescent girls and boys, with special attention to preventing early pregnancy and sexually transmitted infections
- Thorough examination of children who are diagnosed with attention deficit hyperactivity disorder or attention deficit disorder and who are exhibiting behavioural problems and prescription of drugs only as a measure of last resort, only after an individualized



assessment of the best interests of the child, and after children and their parents are properly informed about the possible side effects of the recommended medical treatment and the possibility of non-medical alternatives

In terms of the **mental health of children**, the Office of the Commissioner for Children calls for:

- Allocation of adequate human, technical and financial resources to mental health services and programmes to ensure that the number of qualified medical professionals, including child psychologists and psychiatrists, is sufficient to meet children's needs
- Increased availability and accessibility of child and adolescent mental health services and programmes, in particular for asylum-seeking, refugee and migrant children
- Increased efforts to reduce stigma surrounding mental health
- More awareness-raising on the available services and on how adolescents can reach out for help, particularly with regards to self-harm, and increase their self-esteem
- Increased availability of adequate sexual and reproductive health services for adolescents, in particular access to modern contraception methods
- Setting up of a new service provided for free by the State and backed by specific training to address problematic use and overuse of the internet

#### IV. Education and Employment

In terms of the **accessibility of education**, the Office of the Commissioner for Children calls for:

- Earliest possible enactment of the new Education Act, amended to address any reservations raised by the Unions that are in the best interests of children
- More regular maintenance of school buildings to ensure that they are safe for children and educators
- Less recourse to suspensions from school and more recourse to extra work with a clear educational value as punitive measures against miscreant students
- More efficient, child-friendly and safe school transport in terms of pick-up and drop-off times and supervision on school transport vehicles
- Schools that cater for all genders and the interactions between them
- Better implementation of the Policy on Inclusive Education in Schools, with specific measures to ensure that students with disabilities, including students with intellectual or psychosocial disabilities, are provided with reasonable accommodation, and teachers and professionals are trained and specialized to provide individual support to children with learning difficulties
- Continued efforts to implement the Alternative Learning Programme and to promote quality vocational training in order to enhance the skills of children and young people, especially those who drop out of school
- Effective measures to improve the accessibility of children in vulnerable and marginalized situations, such as asylum-seeking, refugee and migrant children and children with disabilities, to education
- Improved ad hoc classes for foreign students

In terms of the **quality of education**, the Office of the Commissioner for Children calls for:

- More and better allocation of human, technical and financial resources for the implementation, monitoring and evaluation of the Framework for the Education Strategy (2014–2024)
- Implementation of a human rights-based approach to the entire educational system that is more inclusive of all children and supportive of their aspirations
- Development and implementation of a national plan of action for human rights education, as recommended in the framework of the World Programme for Human Rights Education
- More use of games as a learning methodology
- Revision of curricula and educational methodologies to place further emphasis on the value of education, critical thinking, accepting differences, embracing diversity and building social cohesion, practical life skills (e.g. cooking of healthy meals), and first aid, including mental first aid
- Better utilisation of school tablets and more use of technology within the classroom as well as remotely
- More learning opportunities in the broad sense outside the classroom and school
- More time dedicated to physical education, including through a wider variety of gender-neutral sports options and increased focus on non-athletic aspects of physical education, such as correct posture and overall use of the body for everyday tasks
- More and better sex and relationships education in schools
- Setting up of sensory rooms in all schools

In terms of **early years childhood education**, the Office of the Commissioner for Children calls for:

- More and better playground equipment in school grounds for younger children
- Extension of free childcare scheme to children whose parents are not in full-time employment or training but who could benefit from the service due to certain vulnerabilities within the family
- Efforts to ensure that national minimum standards on early childhood care and education, including occupational standards, are suited to the rights and educational needs of children with disabilities

In terms of **late years childhood education**, the Office of the Commissioner for Children calls for:

- Increased efforts to ensure that all children leaving compulsory education have an acceptable level of mastery of core competencies

In terms of **non-academic support**, the Office of the Commissioner for Children calls for:

- More and better coordination between teachers to ensure a balanced amount of homework
- More and better use of lockers in schools to prevent heavy school bags
- Less sedentary classroom experience and the provision of more comfortable and ergonomic chairs for children
- Improved school breaks in terms of the amount of time allocated and the organisation of games in order to foster inclusion and friendship between students
- Exceptions to healthy food rules on festive occasions like birthdays and school parties
- Greener schools through more plants in schools to promote a healthy environment

## V. Leisure and Culture

In terms of **leisure**, the Office of the Commissioner for Children calls for:

- Improved upkeep of public playgrounds by making the relevant standards legally enforceable
- Setting up of public playgrounds in urban areas that are lacking one
- Constitution of an authority to regulate fun parks and luna parks in order to protect the health and safety of children
- Quiet spaces within the home where children can chill out
- More recreational activities at school and community level for children to spend time with friends
- Closure of roads to vehicular traffic for children to be able to play
- Provision of adequate places with age-appropriate equipment where adolescents and youth can hang around and mingle safely

In terms of **sport**, the Office of the Commissioner for Children calls for:

- More sports facilities in the community for young people

In terms of **culture**, the Office of the Commissioner for Children calls for:

- Increased efforts to reduce prices for entry and participation in cultural activities without undermining their sustainability
- Increased opportunities at school, at home and in the community for children to use their imaginations
- Extension and adaptation of regulations that apply to traditional media to social media platforms

# Conclusion

Much has been done, but much more remains to be done. This simple almost obvious statement sums up this report. It is hoped that the publication and dissemination of this report will help to create awareness among and give direction to stakeholders as to how they should channel their efforts over the next three years or so in order to further the implementation of the National Children's Policy.

The Office of the Commissioner for Children will be doing its utmost to maximise this invigorating effect. However, it would be illusory to think that these efforts of promotion and advocacy will on their own lead to more and better implementation of the Policy. This will not happen unless the gaps in the governance structure of the Policy that have been identified in this report (see chapter 1) are addressed. In conclusion to this report, it is thus important to reiterate the thrust of how these gaps can be closed:

- **Incorporate the UN Convention into Maltese law.**
- **Set up a permanent committee of experts and children to update the Policy in light of changing contexts and develop a strategy with clear and adequate targets, timeframes and resources.**
- **Set up a steering body that has the mandate and power to coordinate and direct the actions of stakeholders towards the fullest implementation of the Policy and eventual strategy.**



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