

PUTTING CHILDREN AT THE CENTER OF POLICY DEVELOPMENT

By Kirsten Hanna and Nic Mason

"The true measure of a nation's standing is how well it attends to its children – their health and safety, their material security, their education and socialization, and their sense of being loved, valued, and included in the families and societies into which they are born."¹

In the mid-2000s, researchers set out to establish the potential impact on children of proposed reform of the Bosnia and Herzegovina energy sector. Part of the study involved asking caregivers and service providers (such as schools and health facilities) how they would likely cope with the expected increase in energy costs; it also involved asking children how they thought their lives would be affected. The conclusions reached by the analysts were sobering. On the basis of statistical and qualitative data, the researchers predicted that the reform would impact negatively on children across a range of domains: their education, health, access to social services, physical safety, and opportunities for play and leisure. To mitigate these impacts, the analysts proposed a reduction in electricity tariffs for public service providers and a range of anti-poverty measures to "cushion the impact of reforms on vulnerable households."²

As this example illustrates, the decisions made by governments can impact heavily on children in ways that are not always obvious. Yet it is all too rare for official decisionmaking processes to incorporate robust, evidence-informed consideration of how children's wellbeing might be affected. The costs to children of poor decisions can be devastating; the costs to society of poor outcomes for children are simply too high to bear. Nonetheless, children's interests remain largely invisible in decision-making processes.

The analysis undertaken in Bosnia and Herzegovina is an example of a child impact assessment, a procedure which holds promise for increasing the visibility of children in government's activities. By this process, policies, legislation, services and other public policy measures ("proposals") are audited for their likely impact on children. Potential impacts—both positive and negative—are identified and alternatives provided that could

The authors are senior researchers with AUT University's Institute of Public Policy, a New Zealand-based research institute. The authors are grateful to Dr Emma Davies for reviewing an earlier draft of this paper, and to New Zealand's Commissioner for Children with whom the authors consulted. The opinions expressed in this report do not necessarily reflect the views of those who reviewed the work or with whom we consulted, and any shortcomings remain the sole responsibility of the authors

mitigate negative impacts and, where possible, maximise benefits. The process recognises that children are entitled to be heard in decisions that affect them and that, as experts on their own lives, children's views can enrich the information base upon which decisions are made. Hence the process improves the quality and quantity of information available to decision-makers.

The ultimate aim is that, by incorporating a child lens in policy processes and improving decisions, government actions across a range of departments and levels will work in concert to improve conditions for children, to create the sorts of environments that allow children to thrive.

Of course, in developing policy, decision-makers must balance the often competing interests of multiple constituencies. Yet there are compelling arguments for making children's interests one of the key concerns in those processes.

- Children are vulnerable by virtue of their level of development and reliance on public services, such as health, education and public transport.
- Children can be disproportionately affected by adverse conditions. For example, the adverse impacts of poverty in a child's early years can be much greater than the impacts of poverty in later childhood or adulthood.³
- As non-voting citizens, children do not have the same opportunities as adults to influence public policy nor do they have the same access to complaints mechanisms, relying instead on adults to advocate on their behalf.
- Policy that is good for children is an investment in the long-term sustainability of the nation: the nation's future depends on how well children are treated today and whether children grow up in conditions that allow them to reach their potential.

CHILD IMPACT ASSESSMENTS INTERNATIONALLY

Since the 1990s, efforts have been made internationally to incorporate child impact assessments into public policy processes. The initiative is often framed in terms of meeting signatories' obligations under the 1989 United Nations Convention on the Rights of the Child ("the Convention"),⁴ in particular Article 3(1) that states that:

"In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration."

In 1997, Flanders, Belgium, led the world by passing legislation requiring that all draft acts affecting children be accompanied by a child impact assessment when presented to

Parliament. Sweden followed soon after in 1999 when its Parliament passed a Bill endorsing a national strategy for implementing the Convention. This strategy included a requirement that national government decisions affecting children be assessed for their impact on them, and recommended that municipal government "set up systems, e.g. Child Impact Assessments and Child Accounting, to monitor the realisation of the best interests of the child in local/regional government".⁵ Elsewhere, a requirement for child impact assessment is spelled out in national strategies. For example, Scotland's Child Strategy Statement called for all departments within the Scottish Executive to "explicitly consider the implications of [policy] for children",6 similarly with Ireland's National Children's Strategy7 and Finland's National Plan of Action for Children.8 New Zealand's Agenda for Children proposes child impact reporting as a possible future development,9 while recommendations have also been made in Victoria, Australia, that the process be adopted.¹⁰ In England, there is no statutory or other formal requirement that policy be vetted for its impact specifically on young citizens. However, the National Children's Bureau and Children's Legal Centre (both children's charities) have conducted or commissioned child impact reports on some of the Bills passing through Parliament.

Endorsement of child impact assessments is also found in UNICEF's Child Friendly Cities ("CFC"), an initiative to assist municipal-level government to incorporate the Convention into its processes. As part of its commitment to the CFC initiative, the City of Edmonton, Canada, has developed a child impact tool for assessing services. Auckland City, New Zealand, too has included child impact assessments in its Child and Family Policy, while in the United States, Shelby County, Tennessee, has developed a web-based application to assist officials to analyse the impact of their work on the county's children. In summary, an appreciation of child impact reporting is evident internationally, at different of levels of government and through a range of instruments. But this has not necessarily translated into action, with reports from Scotland, Edmonton and Flanders suggesting the process is not widely implemented.¹¹ Furthermore, where assessments have indeed been conducted, there is typically little published material in English evaluating either the process or the outcomes, including the ultimate aim of improving conditions for children. There are three notable exceptions to this: discussions of the process in Sweden and the UK have been published in English, while a report on a pilot process in New Zealand local government is also available. Although the process in each country was significantly different-for example, in Sweden the aim was to embed child impact assessments in national and municipal policy and decision-making while in the UK the assessments were conducted outside government-these point to its potential to bring children into the centre of public policy decision-making.

THE CASE FOR IMPLEMENTATION IN THE USA

"If a declaration of independence were to be written today, American women would ask that in the enumeration of the objects for which governments are instituted the welfare of children should head the list; and the American men would agree." Grace Abbott, Chief of the Children's Bureau, 1923

In 1912, a bill was signed into law by President Taft for the creation of the Children's Bureau to "investigate and report ... upon all matters pertaining to the welfare of children and child life among all classes of our people".¹² By the passing of this bill, "a function related to the welfare of children was established as appropriate for the Federal Government".¹³ The Children's Bureau became a centre of expertise to which successive governments turned for research-based information and policy advice on children, including working with the Committee on Economic Security during the Great Depression and with defence-related organisations during the Second World War to safeguard children's interests.

The development of the Children's Bureau was a clear acknowledgement of government's role in child wellbeing: that is, while the care of children is the responsibility of families and communities, governments play a crucial role in recognising and providing the conditions that allow families and communities to nurture their young. However this ideal has not always been realised. For example, differences in child poverty rates between developed nations are determined to a large extent by government policy;¹⁴ therefore politicians to a degree choose what level of child poverty they are willing to tolerate. Despite clear evidence for the negative consequences of poverty on children, US government policy had clearly failed the 14 million American children living in poor households in 2008, not to mention the 7.3 million without health insurance and the 1.1 million children facing very low food security.¹⁵ A century after the establishment of the Children's Bureau, and despite the extraordinary efforts of countless individuals and agencies over that time, too many American children are still living in precarious circumstances.

Statistics like these are at odds with the aspirations of American voters. Polls conducted by First Focus have shown that 90% of those polled believed that every child in America has a right to basic healthcare; 70% favoured the DREAM Act which would, under certain circumstances, extend citizenship rights to the children of illegal immigrants including the right to higher education and to work legally; 62% favour ratification of the Convention and hence children's right to survival, to develop to their full potential and to participate in family, cultural and social life.

4

Child impact assessments would be a vehicle by which the US government could start to better fulfil its obligations towards the nation's youngest citizens, to draw on the extraordinary depth and breadth of expertise that exists in the US in relation to child wellbeing—within government, as well as non-government agencies and the research community—and as a way to respond to public appetite for better provision for *all* children. It would be unthinkable to develop policy without taking into consideration its financial or environmental implications; surely children deserve no less attention.

The current stalled economic recovery is no time to retreat from this responsibility—quite the opposite. As the Chief of the Children's Bureau, Katherine Lenroot, stated during the Second World War: "We cannot put aside until after the war our concern for children. The growth and development of a child does not wait upon convenience but is determined by the conditions in which his life unfolds."¹⁶ The time is now.

HOW CAN OTHER COUNTRIES' EXPERIENCES INFORM A US MODEL?

Although the international literature on child impact assessments is limited, a number of models have been developed. These include models based on experience (e.g. in Sweden, the UK and New Zealand)¹⁷ or combining the UK and Swedish experiences with those from other types of impact assessment, such as health, poverty or gender proofing.¹⁸ The model developed by Scotland's Commissioner for Children and Young People ("SCCYP") was designed specifically for internal use, developed with reference to the international literature as well as through testing and refining the model.¹⁹ Although these models differ in important ways, together they form a starting point for considering how child impact assessment might be incorporated into public policy processes.

Firstly, the literature suggests that a *comprehensive* assessment would cover the following topics:²⁰

- The proposal: A brief description of the proposal, including its rationale, aims and objectives and other relevant contextual information.
- Impacts: The likely impacts of the proposal on children (or sub-groups of children) and whether these are positive or negative according to:
 - The scientific literature on children's wellbeing and expert opinion, with reference to children's physical, social and emotional development.
 - The views of children and other stakeholders on the proposal.
 - Consistency with other relevant instruments, such as human rights treaties, the Constitution, federal and state policies and strategies, etc.

- This should include consideration of impacts in various domains in which children spend their lives, such as home, school and neighbourhoods, as well as the scale and probability of impact.
- **Competing interests:** Any conflicts between the interests of children and other constituencies/imperatives (or between different groups of children, e.g., a gendered analysis) inherent in the proposal and its likely effects.
- Alternatives: Options for mitigating or removing negative impacts and enhancing positive impacts, with a comparison of the various options (e.g., a cost/benefit analysis or other, as appropriate).
- Justifications: When other interests are prioritised over children's, a justification for doing so.
- Evaluation: Monitoring and evaluating the actual impact of the proposal once it is implemented against the expected impacts as well as the assessment process itself.

The *process* by which these topics are addressed will differ depending on the realities of the policy-making process within agencies, the availability of data, and the nature of the proposal itself. Nonetheless, the literature has identified some of the procedural issues that must be addressed if the process is to be adopted, as detailed below.

Which proposals should be assessed and to what degree?

At federal, state and local government levels, it would be impractical (and counterproductive) to assess all proposals. Rather, criteria must be developed to determine which proposals should be assessed. In Flanders, the requirement was initially that all Bills with a *clear and direct* impact on children are to be assessed. The Swedish literature suggests that the scale of impact on children should be the guiding principle.²¹ Alternatively, assessments might be carried out only on proposals that are likely to impact on a priority or strategic areas of interest for the agency concerned (as is the case with Scotland's Commissioner for Children and Young People).

Some have suggested that proposals from sectors in which children are not seen as the typical consumers, such as in transport or energy, may benefit most from the process; however the British experiment found that even in child-focused proposals, such as those relating to education, attention to children's rights was not always evident.²²

It may be that some proposals are inherently well suited to being assessed for their impact on children, such as those that are envisaged from the outset as deliberative, with longer timeframes and opportunities for input from communities of interest. The implementation of policy at the local level is another potential locus for assessments—and consultation with children in particular.²³ The nature of the policy will inevitably also dictate the comprehensiveness of the assessment.²⁴ Some proposals may be so broad as to make a comprehensive assessment unworkable; others may be so straight-forward that a simple form of assessment would suffice. Hence agencies may need to have a range of models at their disposal, but also the flexibility to seize opportunities where they arise for incorporating a child focus and to adapt any model and process accordingly.

When should child impact assessments be made and by whom?

Assessments must be conducted at points in the decision-making process when changes can realistically be made: not so late that it misses opportunities to shape the proposal (or is used simply to justify decisions already made) and not so early that the proposal is formulated in only very general terms.²⁵ The UK experience stresses the need to treat child impact assessment as a process, not a one-off exercise.

This brings us to the question of who carries out the assessment: policy analysts, NGOs, academics, lawyers, child advocates, a cross-sectoral team? The evaluation of one of the earlier British experiments found that more than one agency typically needs to be involved; that is, writers will invariably need to consult other experts, particularly as the effects of a given policy inevitably interact with other existing or proposed policies.²⁶ However, if the process is intended to embed a child's perspective in government's policy-making processes, officials must be involved. In larger authorities, a specialist unit with the relevant expertise could be developed (or an existing unit tasked) to work in partnership with policy-makers across the authority to conduct the analyses:

"The case for such a regime rests on the efficiencies that come from specialist resources (analytical capability, information, knowledge, building of relationships with decision makers)."27

New Zealand's Ministry of Justice has such a unit that vets Bills against human rights legislation (although not the Convention); the process is backed by "a strong legislative and policy mandate" and "carries considerable weight".²⁸ Grafting child impact assessment on to an existing, complementary process may be a sensible way forward. In smaller authorities, where specialist units may not be feasible, internal and external expertise could be drawn together in the form of advisory committees to assist policy analysts.

Who monitors compliance, quality and ensuring the assessment is heeded (monitoring and evaluation)?

Mechanisms must be developed for ensuring assessments are in fact conducted as expected, monitoring the quality of the reports, and ensuring that the reports are given serious consideration, resulting in appropriate actions. Similarly, processes for monitoring and evaluating both the actual impact of proposals on children (i.e., after implementation) and documenting the outcomes of the child impact assessment process itself need to be established.

KEYS FOR SUCCESS

The published literature on child impact assessment is still not advanced enough to provide a blueprint for success. However drawing on the Swedish and UK literature, and the views of the current New Zealand Commissioner for Children, we can postulate a number of factors that are likely to increase the chances of the process taking root.

Firstly, there is consensus that there must be a "supportive policy environment" for child impact assessments, including high-level political commitment to the process and its aims.²⁹ A legislative requirement that assessments be conducted and oversight of compliance by a highly-ranked politician would help create the demand; there should also be a body to receive the reports at a specified point in the policy process and to ensure they are given due consideration during decision-making.

Secondly, there must also be buy-in and engagement from officials, including agency/departmental leaders and the officials who will undertake the work. To this end, there should be an initial period of training, discussion and debate about the process and its rationale.³⁰ The process must be seen by officials to add value to their work. This would require sensible decisions about which policies are assessed and when, as well as the provision of support through, for example, a specialist unit.³¹

Thirdly, the availability of resources is critical, in the form of a knowledge-base (including data on child indicators and information on the determinants of child well-being; on children's entitlements as formulated in human rights, legislative and other instruments; on how a proposal interacts with the work of other government departments and agencies), as well as access to the relevant expertise. Again, a specialist unit could be a central repository of such information and assessment support, as well as having an overview of child-relevant policy initiatives across government departments and the ways a given proposal might interact with others.

Fourthly, making child impact assessments transparent, through informing the public of which assessments are being undertaken, as well as reporting progress, results and actions may help to build a wider constituency of interest within and beyond government.^{32,33} This may create opportunities for external stakeholders to comment on, and provide input into, assessments, as well as act as potentially influential watchdogs to ensure assessments are of high quality and result in appropriate action.

Evaluation of the process and outcomes must become an integral part of the exercise, including examining how the assessment impacted on decision-making. Seeing how an assessment was eventually used may encourage future uptake and provide opportunities for reflection on how to improve the process.

BARRIERS TO SUCCESSFUL IMPLEMENTATION

Despite the potential for benefit, there are some clear barriers to successful implementation. Firstly, incorporating child impact assessments into public policy processes has clear resource implications. The process relies heavily on high-quality information, knowledge and skills—including analytic skills and expertise in evaluation design. The necessary period of initial up-skilling would take time and money, as would the development and/or tasking of a specialist unit to work alongside policy-makers, although this option could result in efficiencies, as noted above.

Furthermore, data on the various aspects of child wellbeing are not always available in disaggregated form and compiling new quantitative and qualitative information is timeconsuming and expensive.³⁴ Similarly, consulting with children and other stakeholders requires time and a level of resources that may not be realistic in each case; even when participatory processes are possible, the most vulnerable and marginalised adults and children may be the hardest to reach.

And, finally, the often non-linear and time-pressured nature of policy work may not always be conducive to incorporating high-quality child impact assessments. If a process is forced onto officials who are already overwhelmed, the end result will inevitably be compromised.

Given these potential barriers, one might question whether child impact assessments should be pursued at all. The best response to this question lies in cases where wellintentioned policy has been shown to have unintended negative consequences for children. For example, an assessment of the British Identity Cards Bill (2004) drew attention to the ways in which its provisions would impact adversely on children, including on unaccompanied asylum-seeking children's ability to access public services.³⁵ The fact that the impact on these children was adverse, presumably because they had not been considered, illustrates the dangers of *not* incorporating such a process. Mistakes are costly; preventable mistakes are inexcusable.

MEANINGFUL CHANGE

"We are prodigal in our dreams for children but often miserly in our deeds. And that, I suspect, tracks back frequently to an elementary difficulty all of us have at times in knowing how to get from where we are to where we want to go." Katharine Lenroot, Chief of the Children's Bureau, 1947

The concept behind child impact assessments is relatively simple and, if well implemented, holds the promise of much benefit. The process could ensure that US policy is informed by knowledge about the determinants of American children's health and wellbeing. It could also open dialogue between departments and agencies to encourage a whole-child and joined-up government approach, "...a route through departmental differences and rivalries by looking at legislative effect on children first, and departmental boundaries later."³⁶ It could help create more transparent, inclusive and deliberative policy processes, by bringing together external stakeholders and those involved in policy development for focused discussion around better outcomes for children. It could give children a voice in actions that affect them.

Children deserve no less—we should not apologise for the fact that the process will require significant resources.

The case for child impact assessments rests on nations' responsibility for the well-being of their youngest citizens and the urgent need to ensure policy across the whole of government works in concert to improve conditions for children. Child impact assessments may help nations get "from where we are to where we want to go". The potential of the process is perhaps best illustrated through examples such as the assessment of the British Identity Cards Bill (2004) and the energy reforms in Bosnia and Herzegovina. It was only through specifically examining policies with a child lens that serious, unintended consequences were identified and could therefore be addressed *before* implementation. Child impact assessments help to avoid the preventable blunders that can arise when children's interests are overlooked and holds promise for improving the quality of decisions made. It also sends a strong signal that children are valued and treasured at all levels of society, as citizens now and as citizens of the future. Child impact assessments could make the US an even greater place for children to live and grow.

¹ UNICEF Innocenti Research Centre. (2007). An Overview of Child Well-Being in Rich Countries. Florence: UNICEF Innocenti Research Centre.

² Krieger, Y. P., & Ribar, E. (2009). Child Rights Impact Assessment of Proposed Electricity Price Increases in Bosnia and Herzegovina. *Children, Youth and Environments, 19*(2), 176-201.

³ Shonkoff, J. P., & Phillips, D. A. (Eds.). (2000). From Neurons to Neighborhoods: The Science of Early Childhood Development. Washington, D.C.: National Academy Press.

⁴ The Convention was signed in 1995 by the US, but has yet to be ratified. All other countries cited here have ratified the Convention.

⁵ Sylwander, L. (2001). *Child Impact Assessments: Snedish Experience of Child Impact Analyses as a Tool for Implementing the UN Convention on the Rights of the Child.* Stockholm: Ministry of Health and Social Affairs and Ministry for Foreign Affairs.

⁶ Scottish Executive. (n.d.). *Child Strategy Statement*. Retrieved 11 October, 2005, from http://www.scotland.gov.uk/library3/social/css-00.asp.

7 Government of Ireland. (2000). The National Children's Strategy: Our Children--Their Lives. Dublin: The Stationery Office.

⁸ Ministry of Social Affairs and Health. (2005). *A Finland Fit for Children*. Retrieved 27 July 2010. from http://www.stm.fi/c/document_library/get_file?folderId=39503&name=DLFE-6719.pdf.

9 Ministry of Social Development. (2002). New Zealand's Agenda for Children. Wellington: Ministry of Social Development.

¹⁰ Premier's Children's Advisory Committee. (2004). *Joining the Dots: A New Vision for Victoria's Children*. Retrieved 27 July 2010. from http://www.cyf.vic.gov.au/__data/assets/pdf_file/0016/17008/min_pcac_report_joining_the_dots.pdf.

¹¹ UN Committee on the Rights of the Child. (2010). *Consideration of reports submitted by States parties under article 44 of the Convention: Concluding Observations: Belgium.* Retrieved from

http://www.ohchr.org/EN/countries/ENACARegion/Pages/BEIndex.aspx Paton, L., & Munro, G. (2006). *Children's Rights Impact Assessment: The SCCYP Model.* Edinburgh: Scotland's Commissioner for Children and Young People. Belgian Government. (2008). *Consideration of Reports Submitted by States Parties under Article 44 of the Convention: Belgium.* Retrieved from www2.ohchr.org/english/bodies/crc/docs/.../CRC-C-BEL-3_4.doc. Sanderson, personal communication, 4 August 2010.

¹² Bradbury, D. E., & Eliot, M. M. (1956). Four Decades of Action For Children: A Short History of the Children's Bureau. Washington, D.C.: U.S. Department of Health, Education, and Welfare.

13 Ibid.

¹⁴ UNICEF Innocenti Research Centre. (2005). *Child Poverty in Rich Countries*. Florence, Italy: UNICEF Innocenti Research Centre.

¹⁵ Federal Interagency Forum on Child and Family Statistics. (2010). *America's Children in Brief: Key National Indicators of Well-Being, 2010.* Washington, D.C.: U.S. Government Printing Office.

¹⁶ Bradbury, D. E., & Eliot, M. M. (1956). Four Decades of Action For Children: A Short History of the Children's Bureau. Washington, D.C.: U.S. Department of Health, Education, and Welfare.

¹⁷ See Payne, L. (2000). Child Impact Statements 1998/99: The Next Stage in Child Proofing UK Parliamentary Bills. London: National Children's Bureau. Payne, L. (2002). Children's Rights and Child Impact Analysis: Making Children Visible in Government. Support for Learning, 3, 128-132. Payne, L. (2007). A 'Children's Government' in England and Child Impact Assessment. Children and Society, 21, 470-475. Mason, N., & Hanna, K. (2009). Undertaking Child Impact Assessments in Actearoa New Zealand Local Authorities: Evidence, Practice, Ideas. Auckland: Institute of Public Policy, AUT University. Office of the Children's Ombudsman in Sweden. Sylwander, L. (2001). Child Impact Analysis. Stockholm: Office of the Children's Ombudsman in Sweden. Sylwander, L. (2001). Child Impact Assessments: Swedish Experience of Child Impact Analyses as a Tool for Implementing the UN Convention on the Rights of the Child. Stockholm: Ministry of Health and Social Affairs and Ministry for Foreign Affairs. Hodgkin, R. (1998). Child Impact Statements in 1997/98: An Experiment with Child Proofing UK Parliamentary Bills. London: National Children's Bureau Enterprises Ltd.

¹⁸ Corrigan, C. (2006). *The Development and Implementation of Child Impact Statements in Ireland*. Dublin: Office of the Minister for Children. Corrigan, C. (2007). Child Impact Statements: Protecting Children's Interests in Policy and Provision? *Journal of Children's Services*, 2(4), 30-43.

¹⁹ See Paton, L., & Munro, G. (2006). *Children's Rights Impact Assessment: The SCCYP Model*. Edinburgh: Scotland's Commissioner for Children and Young People.

²⁰ This list draws together the issues suggested in the child impact assessment literature (Payne, L. (2002). Children's Rights and Child Impact Analysis: Making Children Visible in Government. Support for Learning, 3, 128-132. Office of the Children's Ombudsman in Sweden. (2006). Child Impact Analysis. Stockholm: Office of the Children's Ombudsman in Sweden. Angus, J. (2007). Placing Children at the Centre of Policy Making: A Discussion Paper on Child Impact Assessment. Wellington: Ministry of Social Development. Sylwander, L. (2001). Child Impact Assessments: Swedish Experience of Child Impact Analyses as a Tool for Implementing the UN Convention on the Rights of the Child. Stockholm: Ministry of Foreign Affairs. Corrigan, C. (2006). The Development and Implementation of Child Impact Statements in Ireland. Dublin: Office of the Minister for Children. Mason, N., & Hanna, K. (2009). Undertaking Child Impact Assessments in Corrigan, C. (2006). The Development and Implementation of Child Impact Statements in Ireland. Dublin: Office of the Minister for Children. Mason, N., & Hanna, K. (2009). Undertaking Child Impact Assessments in Assessments.

Authorities: Evidence, Practice, Ideas. Auckland: Institute of Public Policy, AUT University. Paton, L., & Munro, G. (2006). *Children's Rights Impact Assessment: The SCCYP Model*. Edinburgh: Scotland's Commissioner for Children and Young People.), supplemented by the literature on other types of impact assessment, in particular Radaelli, C. M. (2005). Diffusion without Convergence: How Political Context Shapes the Adoption of Regulatory Impact Assessment. *Journal of European Public Policy*, 12(5), 924-943. The paper prepared by J. Angus, Consultant, does not represent the policy of New Zealand's Ministry of Social Development.

²¹ Sylwander, L. (2001). Child Impact Assessments: Swedish Experience of Child Impact Analyses as a Tool for Implementing the UN Convention on the Rights of the Child. Stockholm: Ministry of Health and Social Affairs and Ministry for Foreign Affairs.

²² Payne, L. (2002). Children's Rights and Child Impact Analysis: Making Children Visible in Government. *Support for Learning*, *3*, 128-132.

²³ J. Angus, personal communication, 18 August 2010.

²⁴ Sylwander, L. (2001). Child Impact Assessments: Swedish Experience of Child Impact Analyses as a Tool for Implementing the UN Convention on the Rights of the Child. Stockholm: Ministry of Health and Social Affairs and Ministry for Foreign Affairs.

²⁵ Angus, J. (2007). Placing Children at the Centre of Policy Making: A Discussion Paper on Child Impact Assessment. Wellington: Ministry of Social Development.

²⁶ Hodgkin, R. (1998). Child Impact Statements in 1997/98: An Experiment with Child Proofing UK Parliamentary Bills. London: National Children's Bureau Enterprises Ltd.

²⁷ Angus, J. (2007). Placing Children at the Centre of Policy Making: A Discussion Paper on Child Impact Assessment. Wellington: Ministry of Social Development.

²⁸ Ibid.

²⁹ Sylwander, L. (2001). Child Impact Assessments: Swedish Experience of Child Impact Analyses as a Tool for Implementing the UN Convention on the Rights of the Child. Stockholm: Ministry of Health and Social Affairs and Ministry for Foreign Affairs. Hodgkin, R. (1998). Child Impact Statements in 1997/98: An Experiment with Child Proofing UK Parliamentary Bills. London: National Children's Bureau Enterprises Ltd. Angus, J. (2007). Placing Children at the Centre of Policy Making: A Discussion Paper on Child Impact Assessment. Wellington: Ministry of Social Development.

³⁰ Sylwander, L. (2001). Child Impact Assessments: Swedish Experience of Child Impact Analyses as a Tool for Implementing the UN Convention on the Rights of the Child. Stockholm: Ministry of Health and Social Affairs and Ministry for Foreign Affairs. Angus, J. (2007). Placing Children at the Centre of Policy Making: A Discussion Paper on Child Impact Assessment. Wellington: Ministry of Social Development.

³¹ Angus, J. (2007). Placing Children at the Centre of Policy Making: A Discussion Paper on Child Impact Assessment. Wellington: Ministry of Social Development.

³² Ibid.

³³ Note that this would be within "the parameters of ministers' decisions about confidentiality" (Ibid.).

³⁴ In a study examining the use and non-use of assessment tools, which involved interviews with officials involved in the process, it was noted that, "There was ... a widespread view across our data sample of cases that the critical constraint on assessment was not a lack of tools, but rather a persistent lack of impact data, '[f]rankly we don't need new models ... there are too many models ... [it's] better to have less models but a more consolidated picture" (Nilsson, M., Jordan, A., Turnpenny, J., Hertin, J., Nykvist, B., & Russell, D. (2008). The Use and Non-Use of Policy Appraisal Tools in Public Policy Making: An Analysis of Three European Countries and the European Union. *Policy Sciences*, *41*, 335-355.).

³⁵ National Children's Bureau. (2004). All Party Parliamentary Group for Children Child Impact Statement. Retrieved 19 August, 2010, from

http://www.childrenslegalcentre.com/OneStopCMS/Core/CrawlerResourceServer.aspx?resource=570f5fef98cb434180bb63 8e553c264d&mode=link&guid=d821b5c54a4f4a60a4a1fefcf4e58fec.

³⁶ Payne, L. (2000). Child Impact Statements 1998/99: The Next Stage in Child Proofing UK Parliamentary Bills. London: National Children's Bureau.