

**Ombudsman for Children’s Office**

**Ireland**

**Submission for the 25th Session of the Working Group on Universal Periodic Review**

**31 March 2016**

**Ombudsman for Children’s Office**, **Ireland**

**Presentation to the United Nations Universal Periodic Review**

**Pre-Session on Ireland, Geneva 31 March 2016**

**25th Session of the Working Group on the UPR**

**Human Rights Council**

This Statement is delivered on behalf of The Ombudsman for Children’s Office (OCO), an independent human rights institution established in 2004 under primary legislation[[1]](#endnote-1) to promote and monitor the rights and welfare of children in Ireland. The Ombudsman for Children is appointed by the President of Ireland on the nomination of the Oireachtas (Parliament) and is directly accountable to the Oireachtas. This Office has dealt with over 11,000 complaints regarding the administrative actions of civil and public administration and has frequently submitted advice to Government on legislation relating to children’s rights and welfare. The Ombudsman for Children is mandated to promote the UN Convention on the Rights of the Child (UNCRC) and aims to ensure that Ireland complies with its international human rights obligations.

2. This report has been prepared in light of trends in complaints received by this Office; the outcomes of investigations by the Office; the Ombudsman for Children’s engagement with international human rights monitoring mechanisms; the Office’s advice to Government on legislative change aimed at advancing children’s rights; the Office’s work to consult with and highlight the concerns of children; and research undertaken. Due to submission constraints, it has been necessary to omit a range of issues.

**Plan of the Statement:**

**The statement addresses the following issues:**

1. Incorporation of the UNCRC and the need for capacity building in relation to children’s rights in the civil and public service,
2. The impact of the recession and retrogressive measures (child poverty, homelessness, access to health and mental health services and child welfare and protection),
3. Youth Justice and the age of criminal responsibility,
4. Asylum and Immigration,
5. Education and the elimination of religious discrimination,
6. Services for children with disabilities,
7. Child rights approach to budgets and the need for child rights impact assessments.
8. **Incorporation of the UNCRC**
9. **Follow-up to the First Review**

At the First Universal Periodic Review, Ireland accepted recommendations by Australia, Indonesia, Cambodia, Sweden and Peru (numbers 106.9, 106.10, 106.11, 107.9, 107.10, 107.12).

1. **New Developments since the first review**

The UNCRC has not been incorporated fully into Irish law. A new article was inserted into the Constitution following a referendum which places an express constitutional duty on the State to protect and vindicate the rights of the child by its law, as far as practicable. While the amendment is an important development in recognising children as rights holders, it falls significantly short of constitutional incorporation of the key principles of the UNCRC. With regard to the inclusion of the key principles of the UNCRC in the Constitution, the new provision in relation to best interests and voice of the child only apply in very specific judicial proceedings.[[2]](#endnote-2)

Of particular importance from the perspective of the OCO is **the need to place a legal obligation on public bodies to respect the key principles of the UNCRC in all relevant administrative proceedings or decision making processes.** It has been a consistent theme emerging from the examination and investigation of complaints by this Office that public bodies do not routinely have due regard to the State’s obligations under the Convention in carrying out their functions with respect to children. Although there are areas of good practice, progress to date has been uneven across the public sector. This indicates that a commitment to reflect the principles of the Convention in relevant policy, practice and guidance documents needs to be underpinned by a statutory obligation in this regard.

The UN Committee on the Rights of the Child has recommended in January 2016 that Ireland strengthen its efforts to ensure that the right of the child to have his or her best interests taken as a primary consideration is appropriately integrated and consistently interpreted and applied in all legislative, administrative and judicial proceedings and decisions as well as in policies, programmes and projects that are relevant to and have an impact on children. In this regard, the committee recommended that Ireland should also carry out an audit examining the extent to which legislation affecting children’s enjoyment of their rights complies with its obligations under the Convention.[[3]](#endnote-3)

1. **Recommendations**

**The State should:**

* **Place a legal obligation on public bodies to respect the key principles of the UNCRC in all relevant administrative proceedings or decision making processes.**
* **Develop procedures and criteria to provide guidance to all relevant persons in authority for determining best interest of the child in every area and for giving it due weight as a primary consideration.**
* **Carry out an audit examining the extent to which legislation affecting children’s enjoyment of their rights complies with its obligations under the Convention.**

1. **Impact of the Recession on Children and retrogressive measures**
2. **Follow-up to the First Review**

At the First Universal Periodic Review of Ireland in 2011, Ireland accepted a recommendation by Sri Lanka to make adequate budgetary allocations, despite financial constraints, for the continued provision and improvement of education and health services which are essential to protect the rights of the poorest and the most vulnerable members of society. Ireland also accepted a recommendation from Cambodia to take steps to ensure the economic crisis does not erode human rights.

1. **New developments since the first review**

Children have been significantly affected by the economic crisis in Ireland as can be seen by the huge increase in the number of children living in poverty and the spiralling rates of family homelessness. The freeze on public service recruitment also had a negative impact on the most vulnerable children due to the impact on the recruitment of social workers and other multi-disciplinary professionals working with children. Speaking about the prohibition of retrogression in relation to the realisation of economic, social and cultural rights, the UN High Commissioner on Human Rights has highlighted any direct or indirect steps backward in the enjoyment of rights must be avoided, except where this is fully justified by reference to the totality of children’s rights and in the context of the full use of maximum available resources. In times of financial austerity, any proposed policy change or adjustment must be temporary, covering only the period of crisis. It must be proportionate and non-discriminatory, and comprise all possible measures to mitigate inequalities that can grow in times of crisis. Finally, State parties must ensure that the rights of disadvantaged and marginalised individuals and groups are not disproportionately affected.

**2.1 Child poverty**

In 2014 UNICEF Report which examined the impact of the financial crisis on children across OECD countries found that Ireland saw one of the largest increases in child poverty between 2008 and 2012, ranking 37th out of 41 countries.[[4]](#endnote-4)The report estimated that Irish families lost the equivalent of a full decade of progress during these years. The number of children living in consistent poverty rose from 6.3% in 2008, to 9.3% in 2011 to 11.7% in 2013.[[5]](#endnote-5) While there was a moderate reduction in the consistent poverty rate to 11.2% in 2014, the ‘at risk of poverty’ rate rose from 17.9% in 2013 to 18.6% in 2014.[[6]](#endnote-6)

Children in certain situations are particularly at risk of poverty,[[7]](#endnote-7) including Traveller and Roma children,[[8]](#endnote-8) children in jobless households,[[9]](#endnote-9) children with a disability,[[10]](#endnote-10) homeless children[[11]](#endnote-11) and children living in direct provision centres.[[12]](#endnote-12) It is imperative that the effect of retrogressive measures on the most vulnerable children are assessed and that child poverty targets prioritise specific measures to alleviate the cascading effect of poverty in relation to the most vulnerable children.

* 1. **Homeless children and families**

The number of families experiencing homelessness has increased dramatically. At the end of January 2016 there were 884 families recorded as homeless with 1,830 children living in emergency accommodation.[[13]](#endnote-13) The vast majority of homeless families (769) were in Dublin. The number of homeless children rose by 90% during 2015 and children now account for almost one-third of the homeless population. Reflecting the current homelessness crisis, the OCO has seen an increase in complaints from families in this situation. Cases examined by the OCO highlight concerns regarding significant delays in accessing social housing and the impact of inappropriate, temporary or emergency accommodation on children, where they may reside on a long-term basis. The accommodation provided impacts negatively on family life and children’s development.

* 1. **Health and mental health services**

The Committee on the Rights of the Child raised concerns that the state of health of children in single-parent families, children in poverty and Traveller and Roma children in Ireland is significantly lower than the national average and urged the Irish Government to address socio-economic disadvantages which constitute root causes for exclusion from access to health services for children in these circumstances.[[14]](#endnote-14)

Most of the shortages in children’s mental health services identified in *A Vision for Change* (the Government’s reform programme for mental health services adopted in 2006) still exist and only half of the staffing levels recommended are in place.[[15]](#endnote-15) CAMHs multi-disciplinary community teams have significantly less staffing than recommended and waiting lists for CAMHS services are significant[[16]](#endnote-16). One quarter of children under 18 are admitted to adult wards.[[17]](#endnote-17) There are significant inadequacies in relation to mental health promotion and in primary care mental health supports and children’s access to specialist mental health support is hampered by inadequate interagency communication and collaboration.[[18]](#endnote-18)

A new comprehensive government strategy to address the mental health needs of children and young people is urgently required to ensure effective, co-ordinated mental health care for children. The strategy should take account of the significant developments in the field of mental health support for children and should include quality standards and guidelines for CAMHS. Inpatient care, where required, should be in the least restrictive environment and local alternatives to in-patient services should be explored where possible. Children and young people with experience of mental health problems should be involved in the development of any new strategy and in its implementation. A new strategy should be accompanied by a time-framed implementation plan with a strong commitment in relation to the resources required.

**2.4. Child welfare and protection**

Although the establishment of a Child and Family Agency (Tusla) with statutory responsibility for child protection and welfare services is welcome, the Agency is not meeting its own target timelines for screening and assessment in respect of a substantial number of child protection referrals.[[19]](#endnote-19) The Government introduced legislation to underpin the implementation of Children First in April 2014, Ireland’s Child Protection Guidelines, which will place an obligation on mandated persons to make child protection referrals to Tusla, among other things. However, the legislation has not yet been commenced. All necessary resources need to be put in place to ensure that Tusla can respond in a timely and effective manner to increase in reporting expected upon the commencement of this legislation and its impact on child protection services and practice should be subject to formal review.

Ireland has opted into the EU Victims’ Directive, the transposition date of which was 16th November 2015. However, certain provisions of the Directive, such as Article 8 which deals with the mandatory provision of confidential victim support services free of charge, have not been legislated for. The services dealing with children who are victims of abuse and crime are not adequate. There are significant waiting lists for accessing therapeutic counselling and support services for child victims, in particular for victims of sexual abuse. The State’s only 24-hour service providing forensic examinations of children aged 14 and under who have been sexually assaulted[[20]](#endnote-20) or raped has recently been closed and its future is uncertain.[[21]](#endnote-21) This service also provided ongoing therapeutic support to the child after examination.

1. **Recommendations**

* **The State’s implementation plan for a whole-of Government approach to tackle child poverty should revise the poverty reduction target to take account of the increased number of children affected by poverty. Specific measures should be introduced to alleviate the multiple effects of poverty on particularly vulnerable children.**
* **Emergency accommodation provided to families should be appropriate to the child’s needs and meet child protection standards. Efforts must be increased to address the delay in the provision of social housing for families.**
* **The State should address socio-economic disadvantages which constitute root causes of exclusion from access to health services, particularly in relation to children living in poverty, Traveller and Roma children and children in single-parent families.[[22]](#endnote-22)**
* **A new comprehensive government strategy to address the mental health needs of children and young people is urgently required to ensure effective, timely and co-ordinated mental health care for children accompanied by a time-framed implementation plan with a strong commitment in relation to the resources required.**
* **The Child and Family Agency (Tusla) must be provided with adequate resources to be able to meet its targets as regards timely assessment of child protection referrals to its services and to ensure it can respond effectively when the Children First Act 2015 is commenced.**
* **The State should address the inadequacies that exist within services for child victims of abuse and crime by providing timely access to appropriate therapeutic and support services. Access to 24-hour forensic examinations for children who have been sexually assaulted should be provided as a matter of urgency.**

1. **Youth Justice** **and the age of criminal responsibility**
2. **Follow-up to the First Review**

At the First Universal Periodic Review of Ireland in 2011, Ireland did not accept the recommendation by Timor-Leste[[23]](#endnote-23) in relation to raising the age of criminal responsibility.

1. **New Developments since First Review**

The age of criminal responsibility in Ireland is currently 10 for certain serious offences and 12 for other offences. The relevant section of the Children Act 2001 which raised the age of criminal responsibility from 7 to 12, with a rebuttable presumption that children under 14 are incapable of committing an offence, was never commenced. This section was later amended so that the age of criminal responsibility in Ireland is now 10 for certain serious offences and 12 for other offences, with no rebuttable presumption regarding capacity of children under the age of 14.

1. **Recommendations**

**The State should:**

* **Reinstate the provisions regarding the age of criminal responsibility as established under the Children Act 2001.**
* **Bring its juvenile justice system fully in line with the UNCRC and other relevant international standards, ensuring in particular that detention is a measure of last resort, for the shortest possible period of time and that conditions comply with international standards, particularly in relation to access to education and mental health services.**

1. **Asylum and Immigration**
2. **Follow-up to the First Review**

At the First Universal Periodic Review of Ireland in 2011, Ireland accepted the recommendation by Uruguay to adequately protect the rights and well-being of separated and unaccompanied minors seeking asylum in conformity with international laws. Ireland did not accept the recommendation of Uruguay[[24]](#endnote-24) to assign an ad litem adviser to unaccompanied minors, or the recommendation of the Czech Republic[[25]](#endnote-25) in relation to family reunification and the right for refugees to work.

1. **New Developments since First Review**

The International Protection Act 2015 was enacted in December 2015. While there have been some positive amendments to the Bill in relation to children, and the Act provides for best interests of a child as a primary consideration in specific sections, it does not apply in relation to the decision-making process for a protection determination or to deportation decisions. This should be extended to include any determination in respect of a child directly or where a child may be affected by a decision. The Act does not include a positive obligation to hear and afford due weight to the voice of the child. In particular, while provision is made for circumstances in which an employee of the Child and Family Agency can make an application for international protection for an unaccompanied minor, there is no requirement for the appointment of an independent guardian to advocate for and represent the child through the process.[[26]](#endnote-26) Furthermore, the Act does not permit an accompanied child to make an application in his or her right or for separate consideration of a child within a family application.

At the end of December 2015 there were more than 1,200 asylum seeking children living in the Direct Provision system.[[27]](#endnote-27) The average length of stay in direct provision is three years and four months, but almost 15 per cent of residents have been living in the system for more than seven years.[[28]](#endnote-28) The OCO is very aware of the issues affecting children and families in direct provision which include lack of private living space, safe play areas and cooking facilities for families with children.[[29]](#endnote-29) The OCO has raised child protection and welfare concerns in Direct Provision Centres based on complaints received by the office. The OCO welcomes the recent Government commitment to allow the OCO to investigate complaints from, and on behalf of, children in the Direct Provision System.

1. **Recommendations**

**The State should:**

* **Strengthen provisions of the International Protection Act 2015 as it applies to both accompanied and unaccompanied children to ensure that it upholds the principles and provisions of the UNCRC.**
* **Take immediate steps to progress full implementation of the *Report to Government on Improvements to the Protection Process, including Direct Provision and Supports to Asylum Seekers[[30]](#endnote-30),* which was published in June 2015, particularly recommendations to address child poverty, child welfare and child protection concerns and to ensure families have access to private living space and cooking facilities.**

1. **Education and the elimination of religious discrimination**
2. **Follow-up to the First Review**

At the First Universal Periodic Review of Ireland in 2011, Ireland accepted the recommendation made by Malaysia in relation to the establishment of a network of schools that guarantee equality of access to children.[[31]](#endnote-31) Ireland did not accept the recommendation made by Egypt to eliminate religious discrimination in access to education.

1. **New Developments since First Review**

The majority of schools in Ireland (94%) are still denominational and publically funded. Schools have an exemption under equality legislation as regards their admission policies. Where the school is an environment that promotes certain religious values, the school may admit students with a particular religious denomination in preference to others. Schools may also refuse to admit, as a student, a person who is not of that denomination where it is proved that the refusal is essential to maintain the ethos of the school. This discriminatory feature of the current system for school admissions has not been addressed in the proposed Education (Admission to Schools) Bill 2015.

1. **Recommendation**

* **Measures should be taken to remove all discriminatory features of the current system for school admissions, including with respect to giving preference to students on the basis of their religion.**

1. **Services for children with disabilities**
2. **Follow-up to the First Review**

At the First Universal Periodic Review of Ireland in 2011, Ireland accepted recommendations by Costa Rica to make access available to people with disabilities, on an equal footing, to education, employment, housing, transport and cultural life and facilitate their access to public places and services. Ireland also accepted recommendations of Ecuador to continue with the efforts related to the protection of the rights of people with disabilities, and of Peru to strengthen the legal framework for the protection of the rights of children and the rights of other vulnerable groups, including people with disabilities.

1. **New Developments since First Review**

Access to supports for children with special needs is among the largest categories of education-related complaints to the OCO. Significant parts of the Education for Persons with Special Educational Needs (EPSEN) Act 2004 have not been commenced, including provisions relating to the preparation of individual education plans for children with identified educational needs. The Government has indicated that it intends to bring into effect aspects of the EPSEN Act on a non-statutory basis initially. However, it has not provided a specific timeline or commitment to bring the remaining parts of the EPSEN Act into operation.

The OCO has identified geographical disparities and fragmentation of services as being a challenge facing children with disabilities in Ireland. The Health Service Executive is implementing a model of provision called *Progressing Disability Services for Children and Young People (0-18)* which aims to address some of the deficits at issue in the OCO’s investigatory work. However, key provisions of the Disability Act 2005, which provides a structure for the identification and delivery of individual health, education and personal social services for people with disabilities, has not been implemented. The failure to implement this statutory framework means access to services remain ad hoc and inconsistent across the country.

1. **Recommendation**

* **The state should affirm its commitment to implementing the EPSEN Act 2004 and the Disability Act 2005 in full and set out the concrete, measureable steps it proposes to take to bring this about.**

1. **Child rights approach to Budgets and the need for child rights impact assessments**

The UN High Commissioner for Human Rights noted in December 2014 that no Government can claim to be fulfilling children’s rights to the maximum extent of its available resources unless it is able to identify the proportion of its budgets allocated to children. This implies that budgets should be presented in such a way that specific allocations to children can be identified.[[32]](#endnote-32) Ireland is emerging from a severe economic crisis that has had a wide-ranging, negative impact on children’s enjoyment of their rights. As Ireland moves into a period of greater economic stability, the Government should proceed with the development of cross-Government estimates for expenditure on children.The UN Committee on the Rights of the Child recently recommended that Ireland utilise a child rights approach in the elaboration of the State budget, by implementing a tracking system for the allocation and the use of resources for children, throughout the budget at all levels of government. Given the impact of the recession on child poverty in Ireland, there is a need for the inclusion of children’s rights impact assessments in the framework for integrated social impact assessments to ensure that fiscal and budgetary decisions are compliant with obligations under the Convention.

**Recommendations**

**The State should:**

* **Implement a tracking system for the allocation and use of resources for children, throughout the budget across all the departments and at all levels of government.**
* **Include children’s rights impact assessments in the framework for integrated social impact assessments to ensure that fiscal and budgetary decisions are compliant with obligations under the Convention.**

1. Ombudsman for Children’s Act, 2002. [↑](#endnote-ref-1)
2. The best interests and voice of the child principle in Article 42A only apply in judicial proceedings taken by the State in relation to child care and also to judicial proceedings concerning adoption, guardianship, custody and access. [↑](#endnote-ref-2)
3. Section 3(C), para 29, UN Committee on the Rights of the Child, *Concluding observations on the combined third and fourth periodic reports of Ireland*, January 2016. [↑](#endnote-ref-3)
4. UNICEF, Innocenti Report Card 12, Children of the Recession, p. 8. [↑](#endnote-ref-4)
5. Central Statistics Office, Consistent poverty rate by demographic characteristics and year (CSO), 2010-2014 [↑](#endnote-ref-5)
6. Central Statistics Office, At risk of poverty rate by demographic characteristics and year (CSO), 2010-2014. [↑](#endnote-ref-6)
7. Children’s Rights Alliance, Report Card 2016, p. 69. [↑](#endnote-ref-7)
8. The Office of Social Inclusion, *National Action Plan for Social Inclusion 2007-2016* (Stationary Office 2007), p. 35. [↑](#endnote-ref-8)
9. Ibid 31. [↑](#endnote-ref-9)
10. Ibid 31. [↑](#endnote-ref-10)
11. Ibid 35. [↑](#endnote-ref-11)
12. Health and Information Quality Authority, *Report on inspection of the child protection and welfare services provided to children living in direct provision accommodation under the National Standards for the Protection and Welfare of Children, and Section 8(1)(c ) of the Health Act 2007,* (HIQA, 25 May 2015) 14. [↑](#endnote-ref-12)
13. Department of the Environment, Community and Local Government, Homelessness Report January 2016. [↑](#endnote-ref-13)
14. Concluding Observations on the combined third and fourth periodic reports of Ireland, CRC/C/IRL/CO/3-4, para. 49. [↑](#endnote-ref-14)
15. Health Service Executive, *Fourth Annual Child and Adolescent Mental Health Service Report 2011-2012* (2012) 12. [↑](#endnote-ref-15)
16. The *HSE CAMHS Annual Report 2012-2013* states community based CAMHS services have 44.6% of the staffing level recommended *in A Vision for Change* (the current Government mental health policy document published in 2006). In November 2015, there were 2,273 children waiting for a first appointment with CAMHS, of which 1,177 children were waiting longer than 3 months and 207 children waiting longer than one year. (Health Service Executive, *November Performance Report* (Health Service Executive 2015) p. 10-11). [↑](#endnote-ref-16)
17. Between January and November 2015, 331 young people received acute inpatient mental health care. Of these 241 were admitted to child and adolescent mental health units directly and 90 (27.2%) were initially admitted to an adult unit. Of the 90 children admitted to Adult Approved Centres up to November 2015, 65.6% (59) of these discharged within a week and 41.1% (37) either the same day or within 3 days. Health Service Executive, *November Performance Report* (HSE 2015, p.11). [↑](#endnote-ref-17)
18. Children's Mental Health Coalition, *Meeting the mental health support needs of children and adolescents*, Dublin, April 2015. <http://www.childrensmentalhealth.ie/meeting-the-mental-health-support-needs-of-children-and-adolescents/>.

    The HSE published a standard operating procedure which aims to ensure that the delivery of services by child and CAMHS teams is carried out in a consistent and transparent manner. (HSE, *Child and Adolescent Mental Health Services Standard Operating Procedure,* June 2015.) While a welcome development, this does not address many of the inadequacies in the design and delivery mental health provision for children and adolescents in Ireland. [↑](#endnote-ref-18)
19. In Quarter 3 of 2015, 12% (20% during the same period in 2014) of initial assessments were completed within the target of 21 days of receipt of the referrals. Of the total number of child welfare concern referrals, 64% (62% during the same period in 2014) received a preliminary enquiry within 24 hours. TUSLA, *Quarter 3 2015, Quarterly management, Data Activity Report*, p. 30. [↑](#endnote-ref-19)
20. Galway-based Child and Adolescent Sexual Assault Treatment Service (CASATS). [↑](#endnote-ref-20)
21. “*State’s only 24-hour service for abused children closes”*, Irish Times, January 4th 2016. <http://www.irishtimes.com/news/ireland/irish-news/state-s-only-24-hour-service-for-abused-children-closes-1.2483607> [↑](#endnote-ref-21)
22. As recommended by the UN Committee on the Rights of the Child, *, Concluding observations on the combined third and fourth periodic reports of Ireland,* para 50. [↑](#endnote-ref-22)
23. 108.3 *Consider reviewing its law on the minimum age of criminal responsibility, to be in conformity with international human rights standards* (Timor-Este) [↑](#endnote-ref-23)
24. 107.20. *Adopt immediate measures to assign an ad litem tutor or adviser to unaccompanied minors independently of whether an application for protection has been submitted* (Uruguay) [↑](#endnote-ref-24)
25. 108.15. Introduce a law allowing for family reunions as well as a law granting refugees the right to work (Czech Republic). [↑](#endnote-ref-25)
26. Section 15 of the International Protection Bill does allow for an employee of the Child and Family Agency, on the basis of information, including legal advice, available to it, to make an application for international protection for a child in respect of whom the Agency is providing care and protection, and shall arrange for an employee of the Agency or such other person as it may determine, to make such an application on behalf of the child and to represent and assist the child with respect to the examination of the application. [↑](#endnote-ref-26)
27. Children’s Rights Alliance, Report Card 2016, p. 112. [↑](#endnote-ref-27)
28. Reception and Integration ‘Monthly Statistics Report – September 2015- <http://www.ria.gov.ie/en/RIA/RIA%20Monthly%20Report%209-2015.pdf/Files/RIA%20Monthly%20Report%209-2015.pdf>, accessed 15 March 2016. [↑](#endnote-ref-28)
29. Working Group on the Protection Process (2015) Working Group Report to Government on Improvements to the Protection Process, including Direct Provision and Supports to Asylum Seekers. Final Report, June 2015 (Dublin: June 2015). [↑](#endnote-ref-29)
30. [↑](#endnote-ref-30)
31. 107.27. Accelerate efforts in establishing a national network of schools that guarantee equality of access to children irrespective of their religious, cultural or social background (Malaysia). [↑](#endnote-ref-31)
32. United Nations High Commissioner for Human Rights, Towards Better Investment in the Rights of the Child, A/HRC/28/33 (December 2014), paragraph 35. [↑](#endnote-ref-32)