

Submission on the Draft SA Health Climate Change Framework

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My role as Commissioner for Children and Young People was established under the *Children and Young People (Oversight and Advocacy Bodies) Act 2016* to promote and advocate for the rights, interests and wellbeing of all children and young people living in South Australia, and to help bring about improvements to systems that impact them. This submission addresses the Draft SA Health Climate Change Framework in relation to these rights and interests.

Under the *Children and Young People (Oversight and Advocacy Bodies) Act 2016* each State authority 'must, in carrying out its function or exercising its powers, protect, respect and seek to give effect to the rights set out from time to time in the United Nations Convention on the Rights of the Child' including:

- the right of every child to enjoy the highest attainable standard of health (Article 24);
- the right to have a say on all issues that affect them and for their views to be taken seriously (Article 12); and
- the best interests of the child to be considered in all actions affecting children (Article 3).

In addition, the United Nations Committee on the Rights of the Child has emphasised the undeniable impact climate change is having on children's rights, including their right to life, health, and access to an adequate standard of living. In view of this, I am disappointed to see only one mention of young people in the Draft SA Health Climate Change Framework, albeit to acknowledge that younger people will 'bear a disproportionate burden' in relation to the impacts of climate change on health. There is no mention of how health providers will better understand these impacts or meet these special needs in a tailored way for this population.

Currently, children and young people have minimal voice in the development of the State's health policies and services despite forming 23 per cent¹ of the SA population and being in regular contact with health systems for tests, vaccinations, childhood diseases and other common health matters.

It is essential that those responsible for the design and operation of our state's health services understand that children and young people are key stakeholders and should be informed and consulted as part of their planning and delivery. Understanding the nuances and complexity of young people's experiences will provide the Department for Health and Wellbeing and its agencies with insights into how best to focus their coordinated efforts to uphold their rights.

In my conversations and interactions with thousands of children and young people across SA, I have heard their concerns about the services that affect them and their aspirations and ideas for the future of our State. They have told me what they need to live better, more connected, supported, healthier, safer and happier lives. Most of all, they have said that they want to be given the opportunity to have a voice in the decisions that affect them.

While I welcome developments that acknowledge and seek to address the impacts of climate change on the health and wellbeing of children and young people, the development of this framework in isolation risks failing to meet its goals due to the current siloed and fragmented nature of health and other relevant services. A broader state-wide plan for improving children's and young people's physical and mental health is required to provide an effective environment for the Department to be able to address climate impacts on health in a coherent and broad reaching way.

The submission highlights:

- The impact of climate change on the health of children and young people;
- The need to engage children and young people; and
- The need for an overarching health plan for children and young people.

Yours sincerely,



Helen Connolly

Commissioner for Children and Young People
Adelaide, South Australia

Introduction

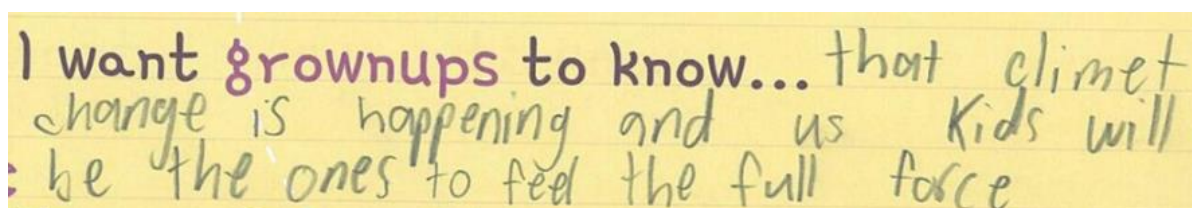
The health and wellbeing of children and young people is integral to the ongoing prosperity and cohesion of South Australia in the face of risks and issues like those resulting from climate change.

Focusing specifically on the health and wellbeing of children and young people is a way to invest effectively in the current and future health of the State. We know that many chronic health problems in adulthood, such as obesity, heart disease and mental health issues, have their origins in childhood. Furthermore, we know that the early years are vital to long-term health and wellbeing. In addition, the health of children impacts the wellbeing of their families and communities.

The children and young people of South Australia have diverse interests and needs:

- 28.4 per cent of students in SA schools receive adjustments for a disability;²
- 18.8 per cent of 5-15 year olds report having a mental health condition;³
- 8.3 in every 100 0-14 year olds report having had a long-term health condition;⁴
- 23.8 per cent are developmentally vulnerable on one or more domains;⁵
- 32.5 per cent are reported to be overweight or obese;⁶
- The highest proportions of children and young people are centred in our poorest suburbs.⁷

Since 2017, I have been actively engaging with the children and young people of SA to hear their thoughts in order to advocate on their behalf. This includes my consultation with thousands of 8-12 year olds through my annual [Student Voice Postcards initiative](#) which gives primary school students a chance to share their views and concerns with me. I have included some of their comments and illustrations in this submission because climate change and listening to children are matters that they repeatedly raise with me.



I want grownups to know... that climate change is happening and us kids will be the ones to feel the full force

Impact of climate change on the health of children and young people

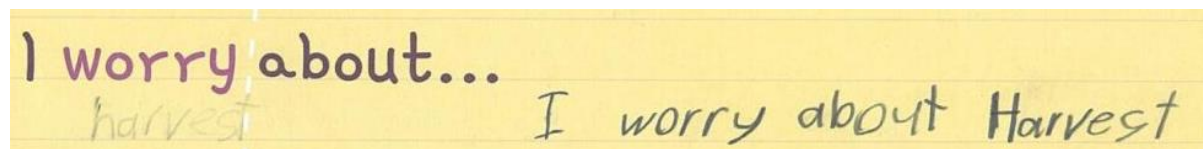
'In South Australia, some of us live in communities that have been directly affected by bushfire, drought, flood, storms, heatwaves, and other extreme weather events. This has left some of us traumatised and many of us extremely concerned and anxious about what comes next.'

– Open Letter to the Australian Delegates attending COP 27 on behalf of South Australia's children and young people⁸

We know that South Australia is getting hotter and drier with more extreme weather events and more frequent climate related disasters. We also know that children and young people are disproportionately impacted by climate change, despite being least responsible for contributing to it.⁹ Many young people in South Australia have experienced the impacts of drought, floods and bushfires, and are likely to again. Today's children and young people are being exposed to emergency events and disasters much more frequently than those of previous generations. Children and young people in South Australia are likely to face regular heatwaves, droughts, floods and bushfires.

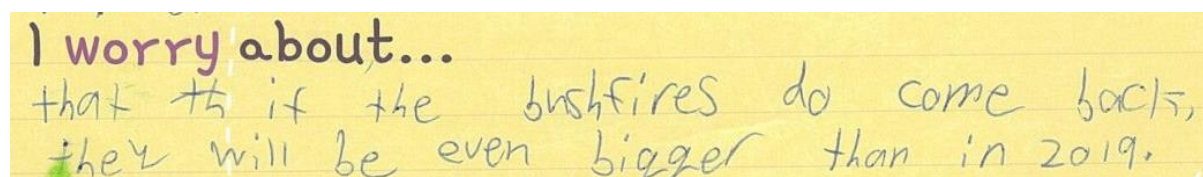
Across South Australia, climate change is already having a significant impact on children's and young people's daily lives and on how they feel about their future. South Australian primary aged children worry about the environment more than anything else. Hundreds of children have said climate change, pollution, the ocean, waste, plastics, drought, deforestation, and bushfires make them feel uncertain about the future and contribute to a feeling of hopelessness.

Many children and young people across South Australia are living in communities directly affected by natural disasters and climatic events, including bushfires, droughts, floods and heatwaves. These disasters have significant effects on their physical and mental health and wellbeing, and have been declared by the UNCRC as a major child rights issue. Children are more likely to suffer post-traumatic stress and mental health disorders from climate related events; they are more likely to be affected by respiratory, diarrheal and vector-borne diseases; and to suffer disruptions to their care and family functioning, which can have widespread impacts.¹⁰



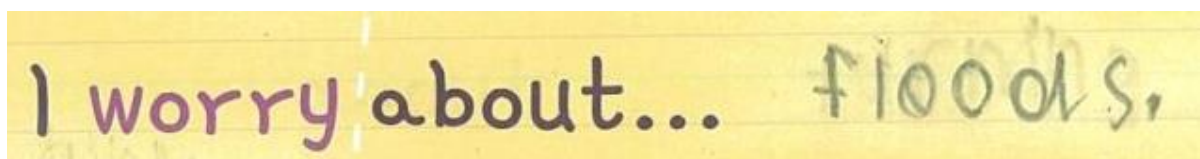
I worry about...
harvest I worry about Harvest

- 10 year old boy, Karoonda



I worry about...
that if the bushfires do come back,
they will be even bigger than in 2019.

- 10 year old girl, Lobethal



- 8 year old boy, Meningie

Children living in disadvantaged areas are particularly at risk of being badly affected, for example, because they live on flood plains or in places with little shade, in houses without air-conditioning or insulation.¹¹ Impacts on their health and wellbeing include the exacerbation of chronic diseases, reduced ability to exercise, reduced access to nutritious food, issues related to poor water quality, and impacts on their mental health. However, there is limited information available about how their health and wellbeing is being affected.

If the Department for Health and Welfare is to meet the goals of its Framework to be 'climate resilient to the impacts of change,' and be a 'provider of high quality health services for patients and communities,' it needs to understand the diverse and increasing impacts of climate change on children and young people and respond appropriately. To do this it must understand the impacts and address them effectively, and it cannot do this meaningfully without engaging with children and young people as experts in their own lives.

Engage children and young people

'We see continued lack of action as a lack of respect and consideration for the wellbeing and interests of present and future generations of all people, but particularly children and young people. We feel invisible, ignored, and 'cut off' from decision-making at school, in our community, and across government.'

- Open Letter to the Australian Delegates attending COP 27 on behalf of South Australia's children and young people¹²


There is limited information made by and for children and young people about climate change-related risks, impacts and solutions, including what positive action is already being taken, and what opportunities are available to them to contribute to these efforts. A lack of information and feelings of powerlessness undermine children's and young people's trust in adults and institutions and exacerbates their climate anxiety. There are also few mechanisms to support their participation in policy and decision-making as it relates to the impact of climate change on the environment and on their lives.

In conversations about the 2019/2020 bushfires and 2020 COVID-19 pandemic, children and young people told me that they were concerned about their inability to have influence over, or be included in, decisions being made in relation to their own recovery. Some young people described feeling ignored and 'cut off' from information and decision-making. They said they felt invisible and were not heard or understood by community leaders.

Many described their reliance on family, friends, teachers, and other community members for reassurance and their most trusted sources of information as inadequate, particularly

as no other 'official' information or communication was being tailored for or directed to them. In fact, the consistent message they heard throughout these two crises was 'you're too young, you don't understand.' What they would have preferred was to have information tailored to their needs communicated through channels to which they are already attuned.

The findings of a Victoria University study echo what SA kids have told me. Associate Professor MacDonald found that, 'When young people are included in disaster management, there are benefits for themselves, their peers, community, and the environment. Yet as they increasingly seek opportunities to engage with issues that will impact them and their futures, they often find they are sidelined'.¹³ This study recommended that young people should be provided with opportunities to help with recovery, as well as being meaningful included in the governance committees that make decisions about disaster preparedness and recovery.¹⁴

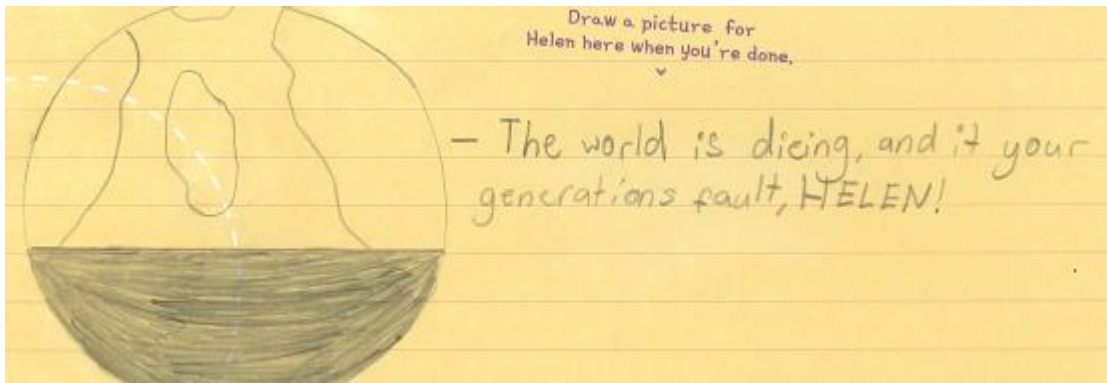


I want grownups to know... I want grownups to know they should listen to kids more. pa

It is essential that decision makers take into account the diverse interests of South Australia's children and young people when making decisions about climate change. They have valuable insights into their world today, and the interests of future generations, however, their voices are seldom heard.

Our youngest citizens are aware of the need to plan in the interests of future generations, as evidenced by the case of *Sharma v Minister for the Environment* which called on the government to fulfil its duty of care to young people¹⁵. Young South Australians tell me that they want decision makers to be future focussed; they want fully integrated solutions that address problems simultaneously and comprehensively, taking into account the most vulnerable in our societies. They're also deeply critical of the decisions that leaders and other adults in their lives are making, which show a lack of consideration for the wellbeing and interests of present and future generations.

Children and young people view the world differently to previous generations and have different expectations of leadership. For some time now, children and young people have been vocalising their increasing concern about growing inequality, fragmenting societies, and the impact of climate change, particularly on vulnerable populations around the world. In the 21st century these concerns are emerging as key issues affecting intergenerational trust, particularly when governments and leaders dismiss children and young people's concerns, and take limited or no action to address the issues they see as critical.



Young people frequently express concern that although they are often best placed to identify their own needs, they are rarely asked to do so. Similarly, although they have ideas and opinions about what will improve their situation, these ideas and opinions are rarely sought. On the rare occasions when they are sought, they are often overlooked.

Governments and other decision makers often underestimate the competencies of children and young people. They tend to rely heavily on adult representations and assumptions, rather than sourcing children and young people's perspectives and experiences direct. At the core of valuing and respecting children and young people is acknowledging and legitimising the view that they are critical stakeholders who have a right to have input into decisions that impact on their lives.

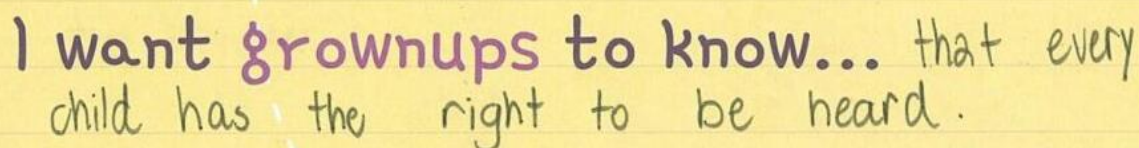
Systems and services cannot presume to meet children and young people's needs without directly sourcing children and young people's views and experiences. Yet children's participation rights are often diluted in favour of other priorities and agendas. This not only undermines effective decision-making, but also impacts children and young people's confidence and trust in adults and institutions.

In 2022 and 2023, I hosted Youth Climate Workshops with young South Australians aged 13 to 18 years old. During the workshops, young people shared their vision for a positive future and discussed what needs to happen to make this vision a reality. This included exploring what existing attitudes, behaviours, policies and practices need to change and what needs to be preserved or scaled up to achieve this vision.

The students developed submissions to [COP 27](#) and [COP 28](#) in which they highlighted 'the impact of climate anxiety on the day-to-day lives of all living creatures' and called for Australian and a world leaders to:

- Give effect to children's fundamental human rights as set out in the United Nations Convention on the Rights of the Child (UNCRC).
- Promote children and young people's access to information and public participation in addressing climate change.
- Rethink architecture and sustainable buildings, and introduce more policies about the impact of design and architecture on health.

We must do more to ensure that children and young people are provided with the opportunities, information and support to participate in decision making and feedback processes that inform the health policies and practices that impact them. Health systems need to value and support the participation of children and young people in decision making, both to ensure children and young people's safety and to tailor policies and services to their needs, experiences and expectations.



I want grownups to know... that every child has the right to be heard.

Meaningful engagement with children and young people improves the design and delivery of services, builds trust and drives better health and wellbeing outcomes at an individual as well as a system level. Meaningful engagement respects children and young people as active contributors and citizens and includes at a minimum:

- Providing a range of ways in which children and young people can be informed and involved across the planning, delivery and review of policies and services that aim to support them.
- Enabling children and young people to speak for themselves rather than through a parent, carer or other adult.
- Establishing or expanding child and youth friendly feedback mechanisms.
- Tailoring information to children and young people in age- and stage-appropriate language so they can understand their rights, supports available to them.
- Recognising and respecting the breadth and diversity of children and young people's experiences and identities, including diversity in terms of cultural background, religion, disability, age, sexual orientation, and gender identity.

Only by engaging with children and young people will the Department be able to meet the following Priority Action Areas stated in the Draft Framework:

- Leadership and governance: To prepare and build capability, health service leaders need to understand the actual and potential impacts of climate change on the health and wellbeing of children and young people.
- Integrated risk and early warning systems: Understanding the potential and actual impacts of climate change on the health of children and young people will form a vital part of any risk and early warning system not only for the health and wellbeing of children today, but also as an indicator of the health and wellbeing of the future adult population.
- Vulnerability, capacity and adaptation assessment: If the health system is to mitigate and respond to the risks of climate health impacts it must understand and implement an 'appropriate range of assessments to enable the generation of policy-level evidence' for one of its most vulnerable populations – children and young people.

A state-wide health plan for children and young people

While it is a positive development for the Department for Health and Wellbeing to be focusing its efforts on the impacts of climate change on health and wellbeing, this is a small part of what is required to improve the health and wellbeing of our children and young people.

I am calling for the South Australian government to develop and implement a state-wide plan for improving children's and young people's physical and mental health, as stated in my recent [Policy Position](#) paper. Any framework relating to the impact of climate change on child and youth health should form a part of this overarching plan.

South Australia currently lacks an overarching vision for children and young people's health and a way of aligning efforts to achieve a common set of goals. In the absence of clear ownership, coordination, and accountability, there are significant gaps in our understanding of how children and young people are faring, and whether current investments are actually working. This has implications for how we collect data, set priorities, and make decisions, as well as how we develop policy, and design and deliver services to children and young people in South Australia.

A range of policies, datasets and services currently cover different aspects of children's and young people's health in South Australia, each providing part of the picture of how children and young people are faring. However, without an overarching strategy summarising this disparate web of policy, programs or data insights, there is nothing that currently sets out specific and measurable commitments to guide action and accountability.

As a result, the best interests of SA's children and young people are not being met. In my latest [Keeping Our Promises Report](#), I have identified that there is little evidence that the Department for Health and Wellbeing is meeting its promises with regard to aspects of child and youth physical health and mental health.



We know that experiences across early childhood and adolescence lay the foundations for future health and wellbeing. The estimated costs associated with late intervention in Australia is \$15.2 billion each year,¹⁶ but this is not inevitable. Key opportunities to reduce preventable conditions arise during childhood, with early investment proven to provide substantial health gains across the lifespan.¹⁷

Decision-makers across all levels and areas of government and non-government agencies as well as service providers, families, and communities, will benefit from a shared understanding of the State's vision for realising children and young people's rights to health, and the actions and commitments put in place to realise this vision.

This need has been recognised at a national level as a result of which there are several health strategies in place that seek to improve children's and young people's health from a national perspective, including the Healthy, Safe and Thriving National Strategic Framework, the National Action Plan for the Health of Children and Young People: 2020–2030 and the National Children's Mental Health and Wellbeing Strategy.

Current strategies for promoting health and wellbeing in SA are often narrowly geared toward improving access to health services, the quality of services and workforce development. Where the focus takes a 'clinical' view of health and health services, key agencies may consider addressing the social determinants of health as being 'someone else's responsibility', with the risk that this becomes nobody's responsibility. In this context, there is also a risk of overlooking:

- the diversity of experiences of children and young people living with disability or chronic illness;
- important intersections between physical health and mental health;
- local-level and region-specific considerations that support healthy communities and consider experiences across systems;
- intersections of cultural background, religion, gender identity, and sexuality;
- the health impacts of racism, gender inequality, bullying, and discrimination; and
- consideration of issues and experiences specific to the 21st century, such as those relating to technology.

Currently, departments and agencies are developing policy and delivering services in a siloed manner. This 'fragmentation of effort' is evident across policymaking, data collection, and service delivery.

Siloes and fragmented effort cause inefficiencies, duplication, and a lack of coordination and collaboration towards a broader set of common goals. For children, young people, and their families attempting to navigate service systems across different agencies and levels of government, can mean contact with a range of providers, and lead to an increasing number of referrals that fail to get them the support they need.

Data issues are further complicated by different definitions of 'child' or 'youth' being applied by different agencies. An overarching approach to health would require the collection of better data about children's health and wellbeing, to inform frameworks like this one.

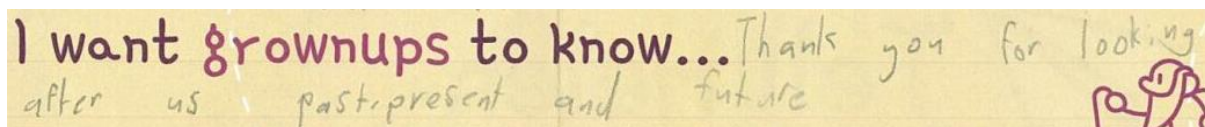
We know that health outcomes depend on outcomes across a range of areas that go beyond the health service system to include education, housing, employment, transport, infrastructure, child protection and youth justice. Climate change can impact health and wellbeing in multiple ways, broad approaches are therefore required to mitigate and respond to the public health risks and issues.

I recommend a social determinants of health approach, which is considered best practice when developing health policy for children and young people. Such an approach is consistent with a rights-based approach and seeks to improve the conditions in which people live by ensuring 'secure, safe, adequate and sustainable livelihoods, lifestyles and environments, including housing, education, nutrition, information exchange, childcare, transportation, and necessary community and personal social health services' are available.¹⁸

Recommendations

I recommend that:

- The South Australian government develop and implement a state-wide child and youth health plan.
- The Department for Health and Wellbeing engages with children and young people to ensure its SA Health Climate Change Framework is responsive to their needs.



¹ South Australia 2021 Census All persons Quickstats, Australian Bureau of Statistics, <https://www.abs.gov.au/census/find-census-data/quickstats/2021/4>

² Australian Curriculum Assessment and Reporting Authority (ACARA), School students with disability, National Report on Schooling in Australia, 2022, accessed 17 November 2023, <https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/school-students-with-disability>

³ Wellbeing SA, South Australian Population Health Survey: 2022 annual report: Children, Government of South Australia, 2023, accessed 23 November 2023, <https://www.wellbeingsa.sa.gov.au/assets/downloads/SAPHS/SAPHS-2022-Annual-Children-Report.pdf>, pp 17, 18.

⁴ Social Health Atlas of Australia: South Australia, Published 2024, PHIDU, <https://phidu.torrens.edu.au/current/maps/sha-aust/lga-single-map/sa/atlas.html>

⁵ AEDC 2021 data quoted on <https://phidu.torrens.edu.au/current/maps/sha-aust/pha-single-map/sa/atlas.html>

⁶ Wellbeing SA, South Australian Population Health Survey: 2022 annual report: Children, p 31.

⁷ Regional population, Australian Bureau of Statistics, 2022-23, accessed 18 June 2024, <https://www.abs.gov.au/statistics/people/population/regional-population/latest-release#south-australia>

⁸ Open Letter to the Australian delegates attending COP 27 on behalf of South Australia's Children and Young People, 14 December 2022, <https://www.ccyp.com.au/open-letter-to-australian-delegates-attending-cop-27/>

⁹ Climate change impacts on child and adolescent health and well-being: A narrative review, K Proulx, B Daelmans, V Baltag, and P Banati, Journal of Global Health, 24 May 2024

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1115477/>

¹⁰ Ibid.

¹¹ The Undeniable Link Between Poverty and the Climate Emergency, 7 October 2022, Save the Children,

<https://www.savethechildren.org.uk/blogs/2022/poverty-climate-crisis-link-between-them>

¹² Open Letter to the Australian delegates attending COP 27 on behalf of South Australia's Children and Young People, 14 December 2022, <https://www.ccyp.com.au/open-letter-to-australian-delegates-attending-cop-27/>

¹³ Research shows young people want to contribute to natural disaster planning and recovery, 30 May 2023, The AIM Network, <https://theaimn.com/research-shows-young-people-want-to-contribute-to-natural-disaster-planning-and-recovery/>

¹⁴ Agents of change in bushfire recovery: Young people's acts of citizenship in a youth-focused, animal-welfare and environmental program, F MacDonald, C Lanyon, L Munnery, D Ryan, K Ellis and S Champion, International Journal of Disaster Risk Reduction, Volume 87, March 2023,

<https://www.sciencedirect.com/science/article/pii/S2212420923000316?via%3Dihub>

¹⁵ <https://www.fedcourt.gov.au/services/access-to-files-and-transcripts/online-files/minister-for-the-environment-v-sharma>

¹⁶ Teager, William, Stacey Fox, and Neil Stafford. How Australia can invest early and return more: A new look at the \$15b cost and opportunity. (Early Intervention Foundation, The Front Project and CoLab at the Telethon Kids Institute, 2019). <https://colab.telethonkids.org.au/siteas-sets/media-docs---colab/coli/how-australia-can-invest-in-children-and-return-more---final-bn-not-embargoed.pdf>

¹⁷ Royal Australasian College of Physicians. Inequities in Child Health. (May 2018).

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