Brussels, 9th February 2009


Dear Sir/Madam,

The European Children’s Network (EURONET) welcomes the opportunity to provide input to the Fundamental Rights Agency (FRA) Work Programme 2010. In doing so, EURONET calls on the FRA to take into account the following recommendations when elaborating the Work Programme 2010.

In general:

1. **The FRA should adopt a child rights perspective when dealing with all the thematic areas set out in the Multi-annual Framework (MAF).** While EURONET welcomes the inclusion of children in some of the work areas other than that of “The rights of the child, including the protection of children”, EURONET considers that it is crucial that a children’s rights perspective is included in all work areas. Children's Rights must be a cross-cutting theme across all of the MAF’s work framed by the 1989 United Nations Convention on the Rights of the Child (UNCRC) and other relevant human rights instruments. Certain specific examples of including children in other work areas include:

   a. Concerning the section on access to justice, a particularly affected group is that of child asylum seekers, for whom there is a lack of legal aid and lawyers who have expertise in immigration and child welfare legislation, and who can efficiently communicate with children. These children should be specifically dealt with in this section.

   b. Concerning the section on multiple discrimination, there are cases in which children are discriminated on grounds of both age and ethnicity and attention should be drawn to this.
Suggestions for new projects ("The rights of the child, including the protection of children"):  

2. **The FRA should be actively involved in the development of a "European Union Strategy on the Rights of the Child."** Euronsent regrets that despite the FRA’s commitment to promote children’s rights and some first activities in this regard, the Agency has not yet taken part in the discussions on a “European Union Strategy on the Rights of the Child”. The FRA as the EU’s key institution for human rights issues, including child rights, should play a key role in the development of such a Strategy.

Ongoing Projects:  

3. **The FRA should clarify its follow up activities concerning research on separated asylum seeking children and data collection in the field of the ‘rights of the child’.** While welcoming the FRA’s projects in the area of the rights of the child, EURONET questions the end goal of this research. What is the specific purpose of the data collection project in the field of the rights of the child? For example, how will the FRA ensure that the findings result in concrete change for separated asylum seeking children in Europe? This should be set out more explicitly. Furthermore, EURONET wishes to highlight that some of the findings could also be relevant to other groups of separated children.

4. **The FRA should consider the production of child friendly versions of the reports of the above mentioned studies.** EURONET welcomes the FRA’s project on communication and awareness-raising, and its continued publication of its S’cool Agenda aimed at school children and youth. EURONET would however like to stress the need for emphasizing such child-friendly publications more specifically within “The rights of the child, including the protection of children” MAF area of the work programme. Furthermore, such publications should be aimed at different age groups of children and young people so that the material remains relevant and purposeful.

New Projects:  

5. **EURONET regrets that children are not dealt with in any specific new project,** but wishes to stress the importance of including the meaningful and safe participation of children in the various structures mentioned in the Freedoms section dealing with asylum and immigration.

Structural comments:  

In addition, the FRA should consider a more effective mechanism in relation to stakeholder cooperation. EURONET considers that two annual stakeholder events for civil society are not sufficient, and not particularly efficient. EURONET suggests setting up sub-groups of stakeholders to obtain more targeted input, with some linkage between various groups as there will be cross-cutting issues.
We thank you for taking these suggestions into account when elaborating the FRA Work Programme 2010. We would be happy to provide more detailed information if required and to meet to discuss further.

Yours sincerely,

Elizabeth Niland
The European Children’s Network

The European Children’s Network is a coalition of networks and non-governmental organisations from across Europe campaigning at European level for the interests and rights of children. Since 1995 EURONET has contributed to the implementation of children’s rights at European level and gave extensive input to the European Commission’s Communication ‘Towards a European Strategy on the Rights of the Child’. (COM (2006)367 final).