Brussels, 1st September 2008


Dear Sir/Madam,

The European Children’s Network (EURONET) welcomes the initiative of the Fundamental Rights Agency (FRA) to consult with civil society on its Work Programme 2009. EURONET looks forward to a specific strand of work on children’s rights being included in the Agency’s work in future. EURONET calls on the FRA to take into account the following recommendations when elaborating the Work Programme 2009.

1. The FRA should adopt a child rights perspective when dealing with all the thematic areas set out in the Multi-annual Framework (MAF). Despite the inclusion of children’s rights in the field of action of the FRA, EURONET regrets that in the 2008 Work Programme children’s rights have been dealt with only in the context of one of the nine’s MAF’s areas (“the rights of the child, including the protection of children” Art.2, (d) MAF). 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.

2. The FRA should develop child participatory approaches to ensure that children are given a voice in relevant consultations, processes, research studies and analysis. Children’s views currently go unheard in the FRA’s work. Children should be considered as partners and actors in the FRA’s activities in line with article 12 of the UNCRC. The FRA could also explore the role that the EU institutions and Member States can play in exchanging good practice and encouraging participation by children in all decisions that affect them.

3. The FRA should promote research into the ways in which children are discriminated against as a group because of their age. Combating discrimination has been a main issue of concern for the FRA work in 2008. “Age discrimination”, however, often focuses on older people in the context of employment. There has been no discussion of the extent to which age discrimination affects children.

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4. **The FRA should take a lead in coordinating data collection in regard to the implementation of children’s rights standards across the European Union** - and ensure a follow up to the “Study on indicators measuring the implementation, protection, respect and promotion of children’s rights in the European Union.” EURONET welcomes the ongoing study as it will harmonize and make data comparable across member States. The FRA could play a useful role in encouraging member States to use the indicators, to report on them and to issue annual reports on the situation of children rights across the European Union.

5. **The FRA should be actively involved in the development of a “European Union Strategy on the Rights of the Child.”** EURONET 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 Strategy.

6. **The FRA should develop its own long-term child rights strategy to ensure a consistent approach towards children’s rights** – for methodology issues, consultation with civil society, identification of research priorities and data collection.

7. **The FRA should collaborate with the Council of Europe and the UN Committee on the Rights of the Child and jointly organize a regional meeting with EU member states on the implementation of children rights in Europe.** Regional meetings have already been held for the Southern America region and the Asia region. A meeting at the European level would be an effective mechanism for exchange of information and best practices in relation to implanting children’s rights standards.

We thank you for taking these suggestions into account when elaborating the FRA Work Programme 2009. We would be happy to provide more detailed information if required and to meet to discuss further.

Yours sincerely,

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*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).*