

29 May 2009

**By Mail and By Fax (28400657)**

Constitutional and Mainland Affairs Bureau  
Central Government Offices, 3/F., East Wing  
Lower Albert Road, Hong Kong

Dear Sir/ Madam,

**Comments on the Topic Outline in Second Report on the UN Convention on the Rights of the Child**

I am most grateful for the opportunity to comment on the outline of the captioned report which has so much potential for the betterment of the lives of children in Hong Kong.

As a not-for-profit organisation promoting the child's right to play, Playright Children's Play Association ("Playright") has a clear vision – to enrich the quality life of every child through quality play. Therefore, we believe that the topics to be covered in your coming report, especially for Article 31, are particularly crucial to reflect the whole picture of the implementation of such Convention in Hong Kong.

The comments attached have been distilled from the views of Playright staff and volunteers, and we look forward to our closer collaboration in implementing the Convention for the benefits of children, the future of Hong Kong.

Thank you for your kind consideration.

Yours faithfully,

Kathy Kin-ho Wong  
Executive Director

**Comments on the  
Topic Outline in Second Report on the UN Convention on the Rights of the Child  
By  
Playright Children's Play Association (Playright)**

1. In the outline, the Constitutional and Mainland Affairs Bureau states in its Second Report to the UN Committee on the Rights of the Child that, with reference to Article 31 (which covers the child's right to rest, leisure, recreation and cultural and artistic activities), it will:

*"report to the Committee that the facilities, measures and programmes are broadly elucidated in paragraphs 384 to 396 of the previous report. We will provide updated data where necessary".*

2. With respect to Article 31, Playright reviewed this previous report and the existing outline for the next report, we suggest that summary information should additionally be included the following:
  - (a) the number, type and patronage of indoor and outdoor playgrounds and other designated play facilities in the Hong Kong SAR;
  - (b) any and all leisure and recreation facilities, measures and programmes offered to children in i) public hospitals under the Hospital Authority and in ii) school settings.
3. In addition, Playright proposes the addition of the following topics, which fall variously under other Articles:
  - (a) A response to paragraphs 16 and 17 of the Concluding Observations, regarding the need to establish in the Hong Kong SAR an independent human rights institution with a specific mandate for child rights;
  - (b) A response to paragraph 78 (c) of the Concluding Observations, regarding the recommendation that in the Hong Kong SAR the quality of education should be enhanced in a manner that seeks to reduce the competitiveness of the education system and promotes active learning capacities and the right of the child to play and leisure.
4. Finally, we would like to briefly outline Playright's long sustained concerns regarding the child's right to play in the Hong Kong SAR. Playright earnestly hopes that the upcoming report will take these views fully into account when reflecting the extent to which the Convention on the Rights of the Child is being implemented here.
  - (a) The right of all children to a safe, challenging and accessible play environment, to the design of which they themselves can valuably contribute;
  - (b) The rising level of professional and public anxiety over the rise in juvenile obesity and anti-social behaviour, to both of which the lack of opportunity to play contributes;
  - (c) Concern that advanced technology, traffic growth, loss of outdoor space and fears over safety are further depriving children of access to quality play and leisure opportunities;
  - (d) The inadequacy of play and leisure facilities, measures and programmes for sick children in public hospitals; and
  - (e) The lack of planning for toy library provision in new regional libraries.