Response to the European Commission’s Communication on a Comprehensive Approach to Mental Health

July 2023

The First Years, First Priority campaign welcomes the European Commission’s Communication on a Comprehensive Approach to Mental Health, published on 7 June 2023.

We welcome the recognition that childhood is a crucial life stage in determining future mental health, and the attention to the mental health needs of children, families, and communities. We also welcome the recognition that these require a comprehensive response at national and EU level.

Children’s mental health must become a priority for all Member States, with interventions starting in their earliest years. High levels of stress experienced early in life, for a long period of time, can impact a child’s developing brain and affect their development, with consequences for their health later in life. Poverty and exclusion, as well as poor living conditions, are also important stressors in children’s and caregivers’ lives.

It is clear that the multiple crises and risk factors currently experienced by people across Europe, and beyond, are taking a huge toll on people’s mental health, especially among children and young people. This Communication is part of the Commission’s drive towards a European Health Union, one which can respond to growing health challenges, and which sees mental health as an integral and indivisible part of overall health. With suicide as the second leading cause of death among young people aged 15-19 in Europe, Member States and EU institutions must respond with urgency and commitment to the mental health needs of children, their families, and communities, address the underlying causes and invest in early intervention support.

Our Recommendations:

⇒ Member States should endorse the Commission’s proposals through a Council Recommendation and elaborate clear national action plans to address the growing mental health needs of children and young people, and of their parents and caregivers, starting in early childhood.
⇒ Member States should use all resources available to them to address poverty and social exclusion, and to fully implement the European Child Guarantee.
⇒ The European Commission and Member States should monitor progress on children’s overall health and wellbeing – including mental health – as part of their reporting on health in the European Semester process. This should include attention to the wellbeing of very young children, their families, and other caregivers.
⇒ The European Parliament should consider the mental health needs of young children, their families, and caregivers in their response to the Commission’s Communication, including the own-initiative

1 In Brief. Connecting the brain to the rest of the body. Center on the Developing Child Harvard University
Member States should invest in early intervention and maternal mental health services, including prevention, screening and support programmes for all women, including refugee and undocumented migrant women. Investment in mental health services for vulnerable families will reduce the number of children separated from their biological families.

Member States should increase public investment in early years services focusing on prevention, including home visiting services and mental health support during pregnancy, infancy and early childhood, and ensure a well-prepared early childhood workforce able to intervene early and provide tailored support to children and caregivers.

Member States must invest in mental health services for children in all situations, including children in alternative care and children who are victims of violence and abuse. A trauma-informed approach is necessary to support these children and meet their specific needs.

Member States should adopt integrated, cross-sector approaches to early childhood and ensure that children’s holistic development in their early years, including parent, caregiver and infant mental health, are considered in all policy areas affecting children’s rights and wellbeing.

Member States should ensure mental health support to children suffering from harm in the digital environment, including early intervention strategies, and enhance cross-sector cooperation with helplines and hotlines, as well as victims’ support services, civil society organisations working with children, and existing regulatory bodies.

**Mental health in early childhood**

Children’s early years play a crucial role in their development and wellbeing. The mental health and wellbeing of babies and young children is fundamental to their healthy development and their ability to grow and thrive. Children’s early years, from conception to 5, shape their physiological and mental wellbeing, and lay the foundation for their mental health later in life.

Adverse early childhood experiences, including neglect, trauma, violence, and chronic stress, have a profound impact on children’s lives and their future as adults. Conversely, if infants and young children feel safe to learn, play and explore, to develop responsive relationships with adults and peers, they are more likely to develop abilities to regulate emotions, learn healthy behaviours and build healthy relationships, and to learn and participate in early education and in school. The safe development of children should be ensured both offline and online.

We therefore welcome the Communication’s emphasis on childhood as a crucial life stage in determining future mental health, and its focus on early intervention and prevention – including in nurseries, early childhood education and care (ECEC) settings and in schools – and the need for measures that support the safety and wellbeing of children, including in the digital sphere.

We welcome the Commission’s plan to support the creation of a child and youth mental health network in 2024 – financed by the EU4Health programme – to exchange information, provide mutual support and deliver outreach via youth ambassadors. We urge this initiative to consider the needs of children from their earliest years and to consider how early childhood experiences shape children’s and young people’s mental health.

---

2 Understanding and supporting mental health in infancy and early childhood. A toolkit to support local action in the UK UNICEF UK, 2023
We welcome the Commission’s intention to strengthen mental health promotion by supporting the implementation of the Pathways to School Success initiative, and to develop guidelines on a whole-school approach for wellbeing for schools and policy-makers. We urge the Commission and all those involved to take young children into account, and to consider the ways in which pre-school settings can respond better to supporting young children’s mental health by increased investment in quality staff and services. Nurturing care for very young children – including health, nutrition, early learning, responsive caregiving and safety and security – provides the foundation for children’s growth and physical and mental health, and shapes their preparation for school. Preparing children for school success and supporting their mental health and wellbeing requires governments to invest early in nurturing care for all very young children, as essential for their healthy development and for their lifelong learning, and to prevent higher costs later in life.

**Perinatal mental health**

We welcome the Commission’s acknowledgement of the impacts of discrimination, violence - including gender-based violence - on mental health, and the need to support women and families affected by postnatal depression and other mental health issues. Mental health services that support parents also need to include attention to the needs of very young children.³

Pregnancy and the post-partum period constitute a time of great physiological, psychological and social change in the lives of women, men and other caregivers. This can increase their vulnerability to poor mental health, especially if they are also facing poverty, limited access to services, exclusion, poor living conditions, insecurity or violence. Poor perinatal mental health is associated with an increased risk of obstetric complications, of low birthweight, a lower likelihood of attending antenatal and postnatal check-ups and more difficulties with infant feeding and child-parent bonding. Mental ill-health during the perinatal period is often not detected or addressed and is more common in situations of heightened stress and social disadvantage.⁴ Mental health and social support for mothers, fathers and caregivers can buffer stress and build resilience while also helping the child to be able to regulate stress and other adversities in the future.

All women – including those who often face the greatest difficulties, such as migrant and undocumented women – must have **access to maternal mental health services**, including prevention, screening and support programmes. **Engaged fatherhood** should also be promoted and significant attention should be paid to the needs of fathers/men and to building parenting alliances which result in improved wellbeing of parents, which is crucial for the mental health of children.

**Early childhood home visiting services** are an effective way to improve parental and young children’s physical and mental health, development and wellbeing, to support parents and families and identify any mental health needs they may have. To unlock the potential of home visiting services and support the health of pregnant women and young children, home visitors must be empowered to provide responsive and nurturing care, to support a stimulating and safe home environment, enable the prevention of child maltreatment and early detection of risk and vulnerability.⁵ Additionally, health systems, especially routine

---

³ *In Brief, Early Childhood Mental Health* Center on the Developing Child Harvard University

⁴ *Parental wellbeing, Module 7* UNICEF and the International Step by Step Association, a series of Resource Modules for Home Visitors

⁵ In some European countries a lot of attention is paid to pre- and in-service training of home visitors and equipping them with knowledge and skills that goes beyond care for physical health. For that purpose UNICEF ECARO and ISSA developed Supporting Families for Nurturing Care resource modules for home visitors, including a module on parental wellbeing.
health services - to optimize child development and provide support to primary caregivers - need to be more “developmentally oriented” and family centred.6

**Action needed on underlying determinants**

The physical and mental health of parents and other caregivers affects their ability to care for children. As young children’s emotional and psychological wellbeing is directly linked to the environment in which they live and grow7, their mental health must be considered in the context of their caregivers, families, home environment and wider community. If these relationships are consistently neglectful or harmful, they can cause early mental health problems, while if they are nurturing, responsive and supportive, they promote mental health and an ability to cope with other stressors.8

**Poverty** contributes to poor mental health, with children in low-income households three times more likely to suffer mental health problems than their wealthier peers.9 As the cost of living crisis pushes more households into poverty, children are at increased risk of suffering from poor mental health.10 Child poverty rates in the EU are rising – **24.7 % of children were at risk of poverty in 2022**, compared to 24.4% in 2021 – according to Eurostat figures published in June 2023 and the latest data on poverty and social exclusion in the EU. More than 90% of Roma children are at risk of poverty, with many living in extreme poverty and increased vulnerability to hunger, malnutrition and physical and mental ill-health.11

It is therefore imperative to address the social determinants of health – especially poverty, exclusion, insecurity, homelessness (or the risk of homelessness), discrimination and exclusion. **Poor quality housing** is linked to a range of physical and mental health problems. Overcrowded, insecure and poor-quality housing conditions are risk factors for parental mental health. They can hinder parents, families and caregivers in providing nurturing care for infants and young children. Member States must fully implement the European Child Guarantee, with a focus on children and families most in need.

**Protecting children and ensuring their rights are upheld both online and offline**

We welcome the focus on protecting children’s rights and safeguarding against violence and abuse, including in the digital sphere. The Digital Services Act, which will protect children from targeted advertisement and addition-prone digital design, and the drafting of an EU Code of Conduct on Age-appropriate Design will be key in ensuring children can harness all the opportunities from the online world from early stages. However, children should not be regarded only as victims in need of protection, but as full rights holders. The digital environment should be designed with a holistic child-rights approach in mind, as outlined in General Comment 25 on children’s rights in the digital environment, taking into account the specific needs, vulnerabilities and development of all children.

---

6 To inspire and support these processes UNICEF ECARO, WHO Europe and ISSA initiated a new initiative **Health Systems for Early Child Development**. Under the Initiative a special attention is paid to the mental health of children and caregivers. This platform is also a meeting place for professionals across sectors
7 **Place Matters: The Environment We Create Shapes the Foundations of Healthy Development**, National Scientific Council on the Developing Child
8 **In Brief. Early Childhood Mental Health** Center on the Developing Child Harvard University
9 **Cost of living crisis: how it affects children in Europe and what governments need to do** Save the Children, December 2022
10 Ibid
11 **Extreme poverty afflicts many of the 10-12 million Roma in Europe** Council of Europe Newsroom, October 2019
We celebrate the Commission’s commitment to further implement the European strategy for a better internet for kids (BIK+) and its support for the implementation of the EU strategy for fighting child sexual exploitation and abuse, especially its intention to develop a prevention toolkit focusing on early intervention and links with other services and health determinants. Practical guidance for authorities and professionals working with children is key to ensure targeted and effective support to children at risk in the digital environment. Children are participating in the digital environment from very early stages, and younger children are more vulnerable and exposed to online risks. Therefore, it is important that these initiatives also take into account the needs of very young children, and their caregivers, and that infants and pre-school children are not overlooked.

**Access to mental health care and leaving no one left behind**

The Communication stresses the need to ensure that no one is left behind in access to mental health care and emphasises the need for particular attention to people in vulnerable situations, including children and young people, refugees and migrants, disabled people and those living in poverty and social exclusion. We welcome the focus on addressing the mental health needs of those facing particular and multiple vulnerabilities – such as Roma communities and refugees and migrants, including undocumented migrants.

In this regard we also welcome the EU4Health ‘Call for proposals on the prevention of NCDs in the area of mental health including actions supporting vulnerable population groups, such as migrants, refugees, Roma people and displaced people from Ukraine’.

The psychosocial wellbeing of Roma children and their families isn’t often emphasized enough, despite the known challenges these communities face. We understand that the Roma are disproportionately affected by factors such as social exclusion and discrimination, coupled with difficulties in securing employment, education, housing, and social support. These conditions can significantly influence their overall emotional and psychological resilience, wellbeing and life prospects. Research in Romania and Bulgaria has shown that Roma children often have higher rates (two to six times more likely than non-Roma) of anxiety or depression, demonstrating the need for early intervention.\(^{12}\)

The mental health needs of young children at risk of entering, or already in, institutional care must also be a priority. Placement in residential care is particularly harmful for young children and can significantly disrupt their healthy mental and physical development. The transition from institutional to community and family-based care is still incomplete, along with the underdeveloped foster care system and the refugee crisis, many young children are placed in residential care. Before children are placed in alternative care they usually experience trauma, it is therefore crucial to provide them with adequate mental health support. Moreover, very young children who move from institutional care to foster care or other forms of community-based care, may also need specialized mental health support to help them in the transition.

Much remains to be done to prevent family separation and to enable healthy attachments with caring, supported adults. Support to the mental health needs of parents and caregivers and investment in effective family support are needed to prevent unnecessary family separation.

**Refugee and migrant young children and their families** may also have specific and increased mental health support needs, due to the psychological and physical effects of their migration journey and the experience of trauma both during the journey and in their home country. They may face particular barriers to accessing

---

\(^{12}\)Roma Health and Housing: filling in the gaps. A Policy Paper by the Roma Health Network, European Public Health Alliance, 2022
mental health services, for example due to their migration status or inability to afford services, and may need specialised support.

While focusing on the most vulnerable children and families, high-quality universal services should be accessible to everybody. We therefore welcome the Commission’s re-affirmation of the European Pillar of Social Rights and the right of everyone to have timely access to good quality preventive and curative health care, and the commitment to ensure equal access to mental health services across the EU, as a public health priority.

In most countries mental health services are under-funded and it is often difficult to get mental health support, with long waiting times and high costs where public mental health services are limited. Private provision of mental health services is prohibitively expensive for many families, especially those living in poverty. Ensuring that no one is left behind in access to mental health care requires more public investment in both general and more specialised psychological support services that are available and accessible to all those who need them, including families who face the biggest barriers to public services, but who may have the greatest needs, such as refugees and migrants, families living in poverty, and those in remote places. Young children and their caregivers need tailored support, with dedicated professionals who can respond to their specific needs. At the same time, early detection and intervention of risk factors in children’s lives, through well prepared early childhood professionals working in education, health and social protection services, can significantly contribute to preventing the chronic effects of sustained adverse experiences.

We urge Member States to ensure that all families and caregivers have access to integrated services in order to support their physical and mental health and their ability to provide nurturing care in early childhood, through cross-sector coordination and joined up support systems.

For more information, please contact Dr. Agata D’Addato, Eurochild Head of Programmes and Campaign Coordinator (agata.daddato@eurochild.org).