



DRAFT NATIONAL YOUTH POLICY 2014-2019

A submission from the Human Sciences Research Council and University of Cape Town together with key youth stakeholders

27 February 2015

Table of Contents

Introduction.....	1
Recognizing the strengths of the policy	1
Three overarching recommendations for improving NYP 2014-2019.....	2
<i>Recommendation One: Setting out a clear conceptual framework with substantiating data to inform the policy</i>	2
<i>Recommendation Two: Optimising the 'machinery' for youth development in South Africa</i>	3
<i>Recommendation Three: Addressing the issue of a lack of homogeneity amongst youth</i>	4
Critiques/recommendations by specific policy area.....	5
<i>Economic inclusion</i>	5
<i>Education, skills and second chances</i>	6
<i>Health, substance abuse and disability</i>	8
<i>Nation building and social cohesion</i>	9
Conclusion	9
Appendix 1 List of Participants	11

Introduction

On 16 February 2015, the Human Sciences Research Council in partnership with the Children's Institute, the Southern African Labour and Development Research Unit and the Poverty and Inequality initiative (all at the University of Cape Town) held a workshop in order to consider the draft National Youth Policy.

There were 98 participants in attendance, from 9 academic institutions, 38 non-governmental organisations with youth interests and 3 government departments. Appendix 1 gives their names, organisations and a contact email address. All contributed to the input from which this submission is made, although the combined submission was drafted by Professor Sharlene Swartz, Dr Ariane De Lannoy, Dr Cecil Mlatsheni and Professor Monde Makiwane.

Recognizing the strengths of the policy

We welcome the draft policy for youth development for 2014-2019 (or is it 2015-2020, since both dates are used in the draft policy) in shared recognition of the fact that youth, and the often

dire situations they find themselves in, require a firm commitment from government and development actors to bring about change in both individual lives and at the macro level of economic development. Given the size of the youth cohort in South Africa, there is enormous potential for youth to contribute to their own well-being and to that of South Africa at large. Without targeted interventions many will continue to live in poverty, de facto excluded from the socio-economic and political processes of transformation that are key objectives of national Government.

The policy describes various forms of marginalisation and the multiple ways in which youth are excluded with a strong and appropriate focus on economic marginalisation through high levels of youth unemployment. We especially appreciate the fact that the document, at the onset, recognises that:

- We, as a society, need to move away from a deficiency-oriented understanding of youth to one that sees youth as agents in their own environments, who need to be empowered to enable them to create the kinds of lives that they would value for themselves:

The NYP recognizes that young people are not passive but are the champions of their own development and need space to actively participate in their own growth and in the development of members of society. (p. 3)

- 'Youth' in the SA definition refers to the broad group of young people age 14 to 35. The policy reminds us that this is not a homogenous group: we need to keep in mind various socio-economic, gender, and age differences when developing policy and implementation plans.

The policy sets itself an ambitious goal:

The National Youth Policy 2014-2019 takes into account progress made since 1994, builds on the success of previous policies, further articulates the youth specific proposals of the NDP, strengthens existing interventions, introduces new ones, sheds those that have not worked, enhances the quality of services rendered, extends coverage and increases impact. It attempts to tackle the gaps and stubborn challenges needing new approaches. (p. 5)

However, while we applaud the efforts of the Department of Monitoring and Evaluation to develop this highly important document, we wish to express our concern over a large number of gaps, problems, and inconsistencies within the policy. The bulk of this submission therefore addresses these by making three overarching recommendations to make sure the policy can live up to the goals it sets itself as well as offering specific comments on each of the substantive areas the youth policy addresses.

Three overarching recommendations for improving NYP 2014-2019

Recommendation One: Setting out a clear conceptual framework with substantiating data to inform the policy

1. Despite the strong preamble of the policy, the document clearly lacks a coherent conceptual framework and does not employ an intelligible 'youth lens' that would allow government to respond to issues related to youth.
2. The policy lacks an analysis of previous youth policies and the ways in which these have or have not been successful. It does not seem to build on any previous experience, despite claiming that it will do so.

3. The policy states that it is moving away from a deficit-reduction framework, but is in fact firmly positioned within such a framework. Youth are not considered as having agency and as trying to negotiate very dysfunctional and often oppressive systems.
4. This perception of youth as a 'problem' is exacerbated by the selection of the data presented in the situational analyses. First, it is unclear why the data presented are old, or how these data are being interpreted. Second, the situational analysis lacks a clear understanding of the needs and aspirations of various groups of young people. Third, the policy does not engage with the ways in which youth are violenceed both contextually and structurally.
5. We suggest that a much better job could be done on designing a national 'baseline state of the youth' that could then inform the way forward. This kind of evidence and recent data are available in several research and academic institutes that could be consulted when updating the draft document.
6. An overview of existing interventions and policies that *have* managed to make a difference in the lives of young people could help inform the action points, but is missing. This can extend beyond the national context: we can draw on lessons learned in other countries as well as linking policy more specifically to the regional context.
7. On an international level, the policy refers to the UN's Millennium Development Goals (MDGs) without taking into account that those come to an end in 2015. The UN has developed a "post 2015" process to engage various stakeholders – including young people – in the development of what will become the new Sustainable Development Goals (SDGs).
8. Because of the lack of a clear conceptual framework, and the absence of a clear overview of deliverables, the policy also fails to engage with issues of infrastructure: what is needed to be able to deliver on the goals the policy sets out?
9. The Science Councils, Universities and STATSSA should be tasked to ensure that data is up to date for youth and that a rigorous monitoring and evaluation programme is implemented each year.

Recommendation Two: Optimising the 'machinery' for youth development in South Africa

1. The draft policy acknowledges that there is poor coordination between different youth-related policies, "youth desks", implementing departments and programmes. Despite this the policy does not outline who should be responsible for such coordination, nor for oversight of coordination. This is a key area in which the NYP 2014-2019 could place emphasis for the coming five years – we need to urgently get the machinery for youth development right – at the very least.
2. Currently the roles of the Youth Desk in the Presidency, the NYDA and the Department of Planning Monitoring and Evaluation are not aligned or coordinated.
3. A key suggestion is that the Youth Desk becomes a Ministry rather than a Desk in the office of the Presidency. The NYDA could also be subsumed by a Youth Ministry although it could be unbundled to maintain a funding role similar to the South African Social Security Agency (SASSA) – and like the erstwhile Umsobomvu Fund. Alternatively the NYDA could become a Chapter 9 institution ensuring the rights of youth.
4. This will mean that there will also be the need for a Parliamentary Oversight Committee (POC) and a Minister.
5. If the NYDA remains as it is, a newly formed POC could assume oversight of the NYDA which will then monitor performance and prevent the poor performance of the past (which the policy does well to acknowledge).
6. A Youth Ministry could serve as the central hub that helps various government departments coordinate youth-related development programmes and interventions to ensure an integrated approach. Related to the issue of coordination, it is important that relevant departments, e.g. Department of Small Business Development, Department of Higher Education and Training etc., be aware of their proposed roles and duties implied in the draft. If there is no buy-in from those role-players, nor a commitment to share responsibilities and

information with the other departments for delivering on this policy right from the start, then the requests in the policy run the risk of simply remaining a wish list.

7. A Youth Ministry would also ensure the implementation of the National Youth Policy at both national and provincial levels.
8. Alongside this policy, it is recommended that a comparison of how the new youth policy articulates with specific policies in each of the government departments with a youth focus and interest be commissioned along with a set of position statements from each department, as a start to coordination. This could then contribute towards a set of minimum standards that would set the agenda for youth policy across all sectors.

Recommendation Three: Addressing the issue of a lack of homogeneity amongst youth

1. The policy mentions in its preamble that youth is not homogenous, but there seems little or no substantive engagement with the heterogeneity of youth and how that should be dealt with in implementation of the policy.
2. There are different age groups within the broad SA definition of 'youth' – there can therefore not be a blanket approach to youth. All age groups should be considered when developing policy and subsections thereof. The health section, for example, talks only about sexual and reproductive health among *adolescents*. What about other health issues that affect young people, and what about older age categories? What about gender differences and the different needs for young men and young women? It is important to be specific enough in the design of policy, to allow for transparency, and to be able to measure progress made in various areas of youth well-being.
3. There is only a superficial mention of LGBTI youth. This is not carried through in a substantive manner (e.g. general heteronormative treatment in policy, no engagement with LGBTI youth and their experiences, including violence and bullying at school that drives drop-out, hate crimes, health care seeking behaviour, etc.).
4. The policy does not address different layers of oppression and their intersectionality encountered by youth, such as race, class, gender or location as influencing youth vulnerability.
5. The policy should recognise the different needs of people with different disabilities; this cannot be covered by one general paragraph. In each substantive section disability needs to be addressed, e.g. vocational training, career guidance, access to learning institutions, employment, health, social cohesion. Furthermore, few solutions for disabled youth are offered. This policy needs to be strongly linked to educational policies and special needs education support. The education system should lead to qualification also for children with mental health issues, for example. There is also no attention given to the ways in which disability grants are administered. Parents/caregivers are, for example, may be so dependent on the grant because of high levels of poverty that they may not want to give up on it and allow disabled youth a place into the labour market.
6. There is no mention of the ways in which the policy aims to address the needs of Youth in detention or in conflict with the law, involvement in organised crime/gangsterism, youth experiencing violence, including high levels of sexual violence.
7. Youth in care organisations and the issues they face when transitioning out of care are not discussed.
8. Consideration of the rural/urban 'divide' are missing: the needs and experiences of young people in remote rural areas are different from those in the rapidly growing – often informal – urban areas. The policy does not reflect how those differences will be taken into account.
9. The previous point is also related to youth and migration or 'youth mobility': what do we know about the situation of young people who migrate into the country from neighbouring African countries. How do we deal with their realities? How do we protect their rights?
10. Intergenerational relations and issues that shape the lives of young people are overlooked.
11. The lack of detail and attention to the different experiences, needs and aspirations of different groups of young people and the often general statements listed as "proposed

interventions” makes this a very difficult document to translate into an implementation plan. Because of this lack of detail, the policy does not, or cannot set forward a clear monitoring and evaluation framework and therefore seems to lack ambition. The policy needs to at least pay attention to the following questions: What are the targets? Who will the beneficiaries be? How will targets be achieved? What are the timelines? When will the policy be reviewed. Midterm? Only at the end? Who can be held accountable for delivering on the various parts of the policy? What are the consequences for non-delivery on the targets?

12. It seems important that at this juncture policies for three different youth age cohorts be distinguished – those aged 15–19 – transitioning out of secondary education; those 20-29 attempting to transition into employment; and those aged 30-35 who would hope to join the cohort of fully independent adults.
13. In future youth policies the question of the age range of youth needs to be addressed, especially those aged 14 and those aged 30-35 - to align with developmental and international conventions.

Critiques/recommendations by specific policy area

The situational analysis and policy recommendations could easily be combined into one section. This will ensure that the conceptual frame is consistent with aspirations for youth, their current context and ensure focussed recommendations to address each aspect identified by the situational analysis for action. Below we offer specific critiques by area in the draft policy alongside recommendations.

Economic inclusion

The draft highlighted some of the most important issues regarding youth and employment, namely the high unemployment rate (2/3 of youth are unemployed by the narrow definition); the link between education and the labour market, that there is a lack of sufficient progression to higher education and a resultant skills deficit; the scarring effect of long term unemployment; and the non-homogeneity of youth, for example 15-19 year olds still in education or under skilled would have different needs to 25-29 year olds. It also notes that its recommendations are largely not new.

Critiques

1. The business sector, as key strategic partner in youth development, is not sufficiently engaged in the policy. The policy mentions that business should be consulted on the characteristics required of youth job seekers - but the policy should also recommend that trade unions be consulted on this topic, along with input on the nature, extent and feasibility of apprenticeships and learnerships.
2. The role and importance of the informal sector is not recognised.
3. The role of agriculture in youth economic empowerment is missing.
4. While the policy recognises that there many interventions by various youth stakeholders (government departments and beyond) and that these efforts are largely uncoordinated it does not identify a process to ensure coordination nor does it suggest who the coordinator should be.
5. Similarly, the policy recognises the necessity for increased community service and public employment schemes since, at the very least it keeps youth engaged and reduces NEETs in line with World Development Report, yet it fails to address sustainability of these interventions or a progression pathway for youth who are engaged by them.
6. The Draft calls on a number of departments/ organisations to carry out certain tasks, e.g. page 34 and page 35 (numbering at the bottom of page) Small Business Development Department, Economics Development Department, Department of Public Enterprises, Department of Mineral Resources. Tasks like impact assessments are important and it is

good that they are suggested. However, it is important that the Departments that are called upon to carry out these tasks are in agreement otherwise these will just be instructions that will never be fulfilled. In that case the efficacy of the Policy Document will be severely diminished.

Recommendations

1. Business and trade unions to input on what skills are needed by the labour market and to offer input on how to shape apprenticeships and learnerships (as is currently done in the German model).
2. A national M&E framework where all efforts to create employment can be reported on, recognised, and possibly rewarded (along with increased incentives for businesses who are contributing to youth employment).
3. A strategy to include youth in rural development, including in agriculture and recommendations for how current farmers can contribute to youth employment.
4. Schools need to be helped to strengthen the connections between school and labour market by teaching 'soft skills' that relate to employment, e.g. ethics in the workplace; life skills such as conflict resolution; qualities necessary for employment (see for example, www.pyda.org.za).
5. Business to provide volunteer positions (with small stipends) during school holidays in addition to learnerships.
6. Introduce a 20% employment of youth target in all organisations, similar to BBBEE targets; along with incentives for doing so, and incentives for youth development in general.
7. Create a skills portal (for mobile phones) that offers one-stop access to education, employment and other job skills opportunities.
8. Look into creative ways that volunteerism can contribute to young people's lives and well-being, e.g. enable access to UIF; university fee credits; short skills courses.
9. Coordination of government departments around strategic interventions and targets is critical.

Education, skills and second chances

The policy sets out the different challenges for youth and how these challenges impact on their 'employability' and the impact of this on the economy. It presents a set of tasks for government to develop a system of support for both young people who are in school ('improving the quality of education') and those who may have dropped out ('second chance education'). But some of the action points remain very broad and lack clarity.

Critiques

1. We need more detail on how objectives in the policy, e.g. 'bolstering teacher training' will be achieved. The implementation of this will have different consequences for different cohorts of young people. Does the policy mean that current teachers will be trained on the job? If so, what will the main points of focus of that training be? Or does it refer to teachers who are currently in the training system? The latter is important as it is necessary for trying to avoid a continuation or repetition of the situation of low quality education, but will make no difference for the cohort of youth currently in school. More details on how the objectives will be achieved are necessary to allow for transparency and measuring outcomes.
2. The high drop-out rates in higher education, especially in grade 11, are not engaged with in-depth and yet form a major barrier to the future life chances of youth. Are those who are currently in grades 7-12 de facto being relegated to so-called second chance education, or will policies and interventions be put in place that will allow these learners to 'catch up' (through curriculum support for example) and have a chance at writing and passing their matric exams?

3. The reference to FET (TVET) Colleges is missing accurate data on the context of the colleges. What is the number of private and public FET (TVET) colleges? What is the total number of people they can accommodate? What is the age range of the 115 000 to which reference is made on p. 20;? What grades are needed to enter the colleges, and what is their throughput rate? How do employers feel about the quality of education offered at the colleges – in other words, do diplomas and degrees from the colleges ensure employability?
4. The policy doesn't speak to the role and responsibilities of adults in societies (leadership, coaching, mentorship). Many adults in the poorer communities did not receive higher education. This has an impact on the ways in which and extent to which parents and others can support their children with schoolwork. What can be done to strengthen adults' capabilities so they too can provide more leadership and mentorship?
5. Community colleges are a great avenue to respond to drop-out - but how will one identify such youth, how will access to such colleges be ensured, and how will funding be secured? Who will be responsible for developing a tracking system for youth who drop out of school and ensure that they do not drop out of the entire system of support that is being described? How do young people feel about community colleges? How will colleges respond to the needs of a diverse learner body?
6. Do universities meet their students' needs? If not, what will be done to ensure that they do?
7. Rural youth are more isolated and may need increased access to resources (such as internet access). How will the policy and its implementation deal with this?
8. The policy reflects marginalisation of children not in school, such as street children, where alternative programs other than school-based are needed.
9. We know that economic hardship at home, violence at schools including that perpetrated by educators, contribute to drop-out. We know that effective learning cannot take place in schools that are not safe places for learners. How will safety issues at school and on the way to school be addressed?
10. What kind of teachers do we want for our children and youth? The health section mentions explicitly that health care providers should be empathic and open. We need a team of teachers that are committed to teaching ethics and who are engaged and concerned about young people's lives and the issues they face both at school and at home. How will that be established? We also need an informed teacher body. Are teachers aware of the so-called second chance opportunities, of community colleges and what they offer? If we want pupils to be able to make informed decisions, then we need teachers who can inform them.

Recommendations

1. We need a much more specific plan that explains how "the quality of education" will be improved.
2. We need to engage and involve youth on the factors that allow them to stay in school or the issues that push them out of the educational system. We need a Task Force to investigate and address high levels of attrition in higher education.
3. Government should then tackle teacher union impediments to improving schools and classroom teaching. Teachers need to be aware of the ethics of teaching, and working with young people. One of the issues that need to be addressed is poor (and sometimes unethical) teacher-student relationships, which contribute to learner drop-out.
4. Government needs to also take responsibility for providing an adequate, appropriate, safe and healthy school environment conducive to learning (including but not limited to safe, comfortable classrooms, safe and effective sanitation systems, water supplies, safe private toilet facilities) for all learners. This is a precondition for improving school performance and retention in education. This should include guaranteed access to sexual and reproductive health counselling, health services, including condoms, contraception and screening for STIs and HIV.
5. We need to identify a coordinating body to maintain oversight and develop implementation plans.

6. Fund and support student-driven initiatives to tackle a culture of violence in schools.
7. Create structures to match honours and masters students' academic research projects with youth policy needs.
8. Encourage recent graduates to teach, e.g. Teach First programmes – both as a short term strategy and to inspire youth to follow teaching as a critical and important career. As is the case in Finland, make a master's degree a requirement for teaching.

Health, substance abuse and disability

Critiques

1. The focus is predominantly on adolescents, at the expense of other age groups.
2. The policy does not look at youth in relation to families (this despite pointing out that many youth become pregnant). How will the needs of young parents be met?
3. There is insufficient engagement with sexual violence and the impact thereof and required services and psycho-social support.
4. No mention is made of how access to healthcare without prejudice can be achieved for youth in general, but also for LGBTI youth.
5. Drug addiction is a huge problem in the country, but we currently do not have sufficient centres that can help drug addicts. How will this be dealt with?
6. Depression (and the scarring effect of long term unemployment) is mentioned in the section on employment and unemployment but youth mental health is entirely overlooked in the health section.

Recommendations

1. Better sexual and reproductive health initiatives (such as prenatal care, programmes to prevent foetal alcohol syndrome) are needed for youth.
2. Appropriate health services are still a priority. Allow youth to define what "youth friendly health services" should comprise.
3. Provide counselling and support for families under stress, in order to respond to youth holistically.
4. Programmes that address trauma, continuous trauma, address homophobia and difference as barriers to employment are needed.
5. Many more, free, accessible drug addiction and mental health services centres are needed.

Specific recommendations related to disability and special needs education

1. Priority should be given to the Care and Support for Learning and Teaching framework (SADC initiative, to which SA is signatory) in schools in order to coordinate services between Education and other departments (DOH, DSD, etc.) to address 9 priority areas at national, provincial and district level. Mechanisms to ensure collaboration between teacher training institutions and teachers to address reality of SA classrooms (eg. learning styles, psycho-social needs, learners at different ability levels in the same class) are needed.
2. White Paper 6 is a paper protecting and promoting an inclusive education policy (not special needs/ disabilities only) - the SA CAPS curricula document on diversity in education should be explained / rolled out / implemented.
3. Education departments should stop working in silos: Curriculum, assessment, management and inclusive units should collaborate and jointly implement WP6 and CAPS Diversity in Classroom guidelines for teacher training, assessment and reporting.
4. Support an Employment Grant to assist youth with disabilities access initial employments.
5. Address homophobic (and sexual non conformity) victimisation that reduces access to education for LGBTI learners.
6. We need stronger Private-Public sector partnerships to improve education.

Nation building and social cohesion

Nation building and social cohesion including promoting patriotism is important and appears throughout the draft policy but should never be used as a panacea for economic and social inclusion. The policy should remove all references to nation building, patriotism and social cohesion that only serve rhetorical purposes. As it stands there is no clear argument for why this is important and how it might be achieved.

Critiques

1. The definition of 'social cohesion' is not clear. Without a clear conceptual understanding of this concept, the policy cannot be efficient.
2. We need more concrete recommendations on increasing political and public participation of youth. Do we recognise the fact that many young people want to be able to participate but do not always know how to?
3. We cannot create patriotic citizenship if youth are not heard.
4. There is a gap in terms of investment in social capital, i.e. trust and reciprocity are missing in the policy. This relates to all stakeholders who own the problems our youth are facing

Recommendations

1. Promoting social cohesion and patriotism without attending to economic and social inclusion is disingenuous. Redress and social cohesion must go hand in hand.
2. Teach non-violence and peace-building in schools and in communities; embrace religious, moral and spiritual education in schools.
3. To respond to lack of investment in social capital, ensure that all communities participate in development programmes that reach out to youth and build their efficacy.
4. Involve municipalities and local government in effective implementation of programmes to promote social cohesion – beyond mere symbolic action.
5. Leverage the role of NGOs in promoting social cohesion, citizenship and belonging.
6. Invest in sports and recreation infrastructure and use sports and recreation to develop skills for employment and promote social cohesion.
7. The powerful role of media in socialising young people is overlooked and could be harnessed to enhance social cohesion.
8. The role of religion and culture are not addressed; government cannot be expected to take on all the responsibilities outlined in the policy, but it can draw on the care and support provided by religion and culture.
9. There is no reference to security issues: there are new forms of conflict and terror that impact on youth and their sense of social cohesion and belonging.
10. Young people are referred to in isolation of their social and family contexts, which influence their life choices; we need to address the multiple vulnerabilities that youth face, rather than imagining that they face single or uni-dimensional challenges;
11. The role of technology in the lives of youth is not mentioned. It can both include and exclude – and contribute to social cohesion and opportunity. How will its strengths be harnessed and its threats mitigated?
12. There is no engagement with environmental awareness and climate change – both of these have important implications for sustainable development and citizenship.

Conclusion

Overall the draft NYP needs a thorough redrafting that includes clear and measurable objectives, indicators and targets. Editorially, the document does not read well and lacks adequate transitions and coherence in places. We strongly recommend that spelling,

grammatical errors, inconsistencies, poor referencing etc are all meticulously corrected as they reflect poorly on the priority given to youth development. In addition we recommend that prior to the policy being finalised the following occur:

1. A clear analysis of the 2009-2014 policy, its implementation and its outcomes, be done and accompany the new policy – or at least be commissioned as part of the roll out of the new policy. This should go beyond mere technical measures that reflect, for example, how many young people accessed skills training, but that also shows how those young people are doing subsequent to the skills training.
2. At the very least that the three overarching recommendations made by this submission be incorporated into the policy (or that mechanisms to do so be explicitly stated in the policy):
 - Setting out a clear conceptual framework with substantiating data to inform the policy.
 - Optimising the ‘machinery’ for youth development in South Africa whether by a Youth Ministry or coordination of existing structures through some other means.
 - Addressing the issue of a lack of homogeneity amongst youth , including disaggregating for at least the 15-19 age group and the 20-29 age group.
3. That the time frame for soliciting and receiving feedback be extended to include youth inputs and in depth discussions of new ideas and detailed implementation plans. This would give young people the opportunity to study the draft and formulate and submit their comments. Social media could be used for this purpose. Furthermore, in order to realise the potential of the National Youth Policy it is important that it be accessible and available to young people themselves. For this reason, once finalized it should be available in a summarized format, in a poster format, for example.
4. A well-defined policy should be accompanied by a clearly defined budget. It is therefore recommended that there should be wide consultation regarding budgetary appropriations towards the implementation of the youth policy.
5. That a proper and complete understanding of youth needs and experiences, and of how youth navigate the various systems and challenges they encounter, be commissioned. We need ongoing, longitudinal research to identify what young people are doing to address challenges, and then look into enhancing and supporting that work. In other words, we need to develop a set of well conceptualised indicators of youth well-being to track how youth are doing over time, against clear, unambiguous, non-rhetorical policy indicators. We therefore recommend that the Universities, Science Councils and STASSA be collaboratively commissioned to ensure up to date data and evidence-based recommendations become a key part of the youth machinery. This task should never be put out to tender or consultants for whom the quality of the product is frequently compromised through competitive bidding and unrealistic time lines.

As a group of academics and youth practitioners we are fully committed to youth development in our country and are keen to assist in any way possible to ensure that the National Youth Policy 2014-2019 is a useful and implementable policy. Please do not hesitate to contact any of the following people should we be able to assist further in its finalisation.

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