Comments on National Youth Policy Draft 2024

Submitted by Centre for Mental Health Law & Policy, ILS, Pune, India

Executive Summary

This document contains feedback and comments on the draft 'National Youth Policy' outlining a ten-year vision for youth development in India drafted by the Ministry of Youth Affairs and Sports. The comments contained in this document have been submitted by the Centre for Mental Health Law & Policy (hereafter referred to as 'the Centre'), Indian Law Society, Pune, India.

The mission of the Centre is to strengthen and transform the mental health of communities to be holistic and responsive in addressing individual and collective well-being. The Centre adopts a rights-based approach to mental health and works with governments to promote evidence-based policy reform for mental health and suicide prevention. The Centre works extensively in youth mental health and suicide prevention. Outlive is a project addressing urban youth suicides by engaging young people to develop suicide prevention interventions. ENGAGE is a gatekeeper training programme for schooleachers in Chhattisgarh to identify, assess, support, and refer at-risk adolescents for suicide prevention support. The SPIRIT study evaluates an integrated suicide prevention programme spanning across public health, suicide, and agriculture in rural areas. An important component of SPIRIT is the Youth Aware of Mental Health programme which trains adolescents to increase awareness of mental health, develop coping strategies, and encourage support-seeking behaviour. Atmiyata, a project listed by the World Health Organisation as one of twenty-five good practices for community outreach mental health services in the world, addresses young people's mental health in the community as one of its objectives. Most recently, the Being initiative undertook a landscape study to assesses the wellbeing drivers and mental health needs of young people in India.

The following comments on the draft National Youth Policy are drawn from this breadth of expertise of the Centre in youth mental health and suicide prevention.

General comments

In the following section, we provide broad suggestions on the draft policy.

Predominantly focused on the individual, needs to address systemic and structural gaps

The language in the draft policy primarily focuses on issues related to young people, at an individual or personal level. However, it does not acknowledge the systemic issues and socioeconomic factors that influence young people's wellbeing, growth, and development. This framing places disproportionate responsibility and burden on young people to bring about change, instead of identifying and addressing systemic challenges. Additionally, there is a need to recognize and acknowledge the needs of diverse identities of young people, in terms of their caste, class, gender, sexuality, religion, etc. and provide policy provisions that *meaningfully* ensure inclusive growth and development.

Technology as a means and not an end

While technology has been rightfully utilized as a *tool* to connect with young people, it should not be considered a panacea to achieve the policy's objectives. Aspects that must be factored into the use of technology include cyber security and safety, especially for young people from marginalized groups. It is imperative that sufficient guard rails are in place to protect confidentiality and privacy of young people's data. While it effectively highlights the need to "improve inclusion of marginalized and vulnerable youth population," addressing the need to build capacity on digital literacy and raise awareness on the existing systems is crucial to reach diverse youth populations.

Strengthening ecosystem barriers

Employability, entrepreneurship, and improved education outcomes are contingent upon strengthening ecosystem-related barriers that include youth-friendly economic, employment, climate change, and technology related policies and practices that focus on long-term sustainability and growth of young people. This would include ensuring that young people are meaningfully engaged in the agenda-setting, development, implementation and evaluation of such policies and programs. The Department of Youth Affairs can play a critical role in facilitating such consultative and collaborative processes in line with the goal of 'empowering young people as leaders of change'.

Another important barrier to be addressed is intersectoral collaboration and coordination to achieve the goals of the draft policy. Given the cross-sectoral priorities listed in the policy, it is important to highlight linkages and mechanisms with other ministries and departments within health, education and labor for effective governance and accountability to strengthen existing initiatives and avoid duplication of efforts.

Specific Comments

In the following section, we provide specific and detailed comments on relevant sections in the draft policy.

Chapter 3: Inculcating Social Responsibility Among Youth and Outreach to Vulnerable Groups

The chapter focuses on improving volunteering among youth, with a section dedicated to *Encouraging Inclusive Social and Economic Growth.*

Here the policy does acknowledge that certain groups of young people belonging to specific identities face challenges in accessing education and employment opportunities. The main focus is on improving access to government programs by improving dissemination activities. Missing from the policy are other facets that need to be addressed to promote inclusive development and promote diversity.

Some points to be addressed include:

- Broadening the recognition of marginalized youth to those who are invisibilized and excluded from mainstream policies and practice. This includes young people from groups marginalized by caste, religion, disability, ethnicity, gender (trans and non-binary youth), sexual orientation etc.
- Tackling structural and institutional discrimination that may prevent young people from marginalized backgrounds from accessing opportunities, this includes promoting anti-discriminatory practices and code of conducts within institutions, affirmative action policies etc.

- Ensuring support systems are in place for young people from marginalized communities in education institutions and workplaces. This includes mentorship programs, peer support and other financial and emotional support programs.
- Promoting sustainable development policies and programs that recognize and respect the diverse identities of youth and the communities where they belong. For instance, ensuring that in the process of striving for economic growth and development, the land and environment of indigenous and tribal communities are preserved and protected.

Chapter 5: To encourage a culture of fitness and healthy lifestyle

This chapter focuses on the importance of embedding a culture of a healthy lifestyle, which focuses on physical and mental health of the young person.

While the chapter emphasises physical fitness with the slogan "fitness ki dose adha ghanta roz," it lacks a comprehensive integration of mental health, which is crucial for overall well-being. The mental health component is only briefly mentioned in the context of physical fitness and not given enough prominence as a standalone issue. Given the increasing concern over youth mental health, this chapter should expand on strategies to enhance mental resilience and enable mental wellbeing through strengthening social and structural support alongside physical fitness.

Some points to be addressed include:

- Broadening the recognition of stress, anxiety and mental distress as structural issues rather than individual issues. This includes acknowledging life factors such as work, family, social or personal concerns, and expectations on young people to succeed and therefore requires a systemic rehaul to address stressors instead of the sole focus on individual factors and counselling. For instance, it is important to address that the major contributor to stress and anxiety among young people is related to life factors. For more information, please refer to the Being report on Youth Mental Health Landscape [here](#).

- Tackling stigma surrounding mental health as a key component, fostering an environment where young people feel comfortable seeking help. For instance, under "A holistic system of health care with a focus on mental health," it rightfully acknowledges the importance of institutional mechanisms. However, it overlooks the deeply ingrained stigma surrounding mental health in India, particularly in rural or disadvantaged communities.

- Promoting supportive initiatives for mental health beyond counselling and stress management techniques. It can highlight the importance of youth-based support systems such as youth-led initiatives, peer support programmes, and community-mental health programs. Peer supporters serve in [various capacities](#), including providing one-on-one support to mental health service users, increasing awareness and destigmatising mental health, facilitating mutual support groups, and managing alternative services to mainstream mental health care. This follows the notion that young people are equipped to provide support to one another and provide a safe space for young people to share their lived experiences.

- Explicitly acknowledging suicide as a major structural issue facing young people linked to personal, social, and socio-economic factors (including education, employment and social

discrimination) and implement policies and programs across sectors for suicide prevention. For instance, promoting anti-discriminatory practices in educational institutes and early-identification of suicide risk through gatekeeper programs.

- Furthermore, integrating mental health focus within school and university mental health systems could also be instrumental in normalizing conversations around mental health from an early age. Educational institutions are pivotal environments where youth spend much of their time, and the pressures they experience there can contribute significantly to mental health challenges. Programs that promote mental health literacy, early intervention, and peer-led counseling within educational institutions should be a priority. Integrating mental health education into the curriculum