

Childcare Strategy Consultation
Room E3.18
Castle Buildings
Stormont Estate
Belfast
BT4 3SR

13 November 2015

Dear Sir/Madam

RE: 'Delivering Social Change Through Childcare' Consultation Response

Employers For Childcare Charitable Group aims to make it easier for parents with dependent children to get into work and to stay in work. We recognise the need to actively lobby Government on issues which affect parents and families. We specifically address the barriers parents, in particular mothers, face in participating in or re-entering the labour market. For many years we have been calling for Government to recognise childcare as both a social and an economic issue. Much research, including our own, has shown that childcare is a real barrier to employment.

We were encouraged that a commitment to develop an up-to-date Childcare Strategy for the region was given in the Programme For Government 2011-15 and that the Executive made its first steps towards addressing the problems associated with childcare through the *Bright Start Framework* in 2013. We welcome the development of a full ten-year, childcare strategy for Northern Ireland and would like to take this opportunity to respond to the Northern Ireland Executive's *Delivering Social Change Through Childcare – A Ten Year Strategy for Affordable and Integrated Childcare 2015-2025* consultation. Our comments and recommendations are outlined below.

Evidence Base

Employers For Childcare Charitable Group has carried out some key pieces of research which can provide a sound evidence base, these include:

- Sizing Up: a comparative study of childcare policy and legislation across the UK (2010)
- Northern Ireland Childcare Cost Survey 2010 (responses from 622 childcare providers and 1,047 parents)
- Childcare for All? Consulting families of children with disabilities and/or special needs about childcare and employment (2011) (responses from 235 parents)
- Northern Ireland Childcare Cost Survey 2011 (responses from 639 childcare providers and 2,478 parents)
- Wraparound childcare in primary schools: consulting primary schools on the provision of wraparound services (2012) (responses from 342 schools)

M A K I N G W O R K B E T T E R F O R E V E R Y O N E

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- Northern Ireland Childcare Cost Survey 2012 (responses from 886 childcare providers and 3,719 parents)
- Managing Expectations: A Survey of New Mums and Dads (2013) (responses from 492 parents).
- Northern Ireland Childcare Cost Survey 2013 (responses from 761 childcare providers and 4,396 parents)
- Childcare Cost Survey 2014 (responses from 900 childcare providers and 4,263 parents)
Striking the Balance: The impact becoming a parent has on employment, working life and career (2015) (responses from 4,263 parents)
- Northern Ireland Childcare Cost Survey 2015 (responses from 909 childcare providers and 4,943 parents).

Each of these pieces of research explore the key problems associated with childcare in Northern Ireland and draw recommendations. Our findings will be used to inform this consultation response.

In addition, since 2010 we have provided a Family Benefits Advice Service for parents. Our specialist advisors carry out personalised benefits checks for parents and better off calculations to ensure that every parent is claiming all the financial help they are entitled to, particularly with the cost of childcare. We also deal with queries on all childcare and work related issues.

Through our Childcare Solutions business we provide employment opportunities for those interested in a career in childcare. We provide an Approved Home Childcare service to parents and recruitment services to day nurseries and other childcare settings. We also offer a unique childcare service to parents of children with a disability.

Employers For Childcare also operates its own training company Blaris Training Solutions, providing training to childcare providers, parents and employers. Popular courses include Childminders' Core Training and Promoting Positive Behaviour.

Finally, since 2004 we have been working with employers across the UK to offer the Childcare Voucher scheme to help parents save money on the cost of registered childcare. Childcare Solutions, Blaris Training Solutions and Employers For Childcare Vouchers are social enterprises. 100% of the profit made from these companies is donated to our charitable services.

1. Comments on the Aims and Objectives of the Childcare Strategy

Aims

We are pleased that the aims of the strategy focus both on childcare's role in supporting the development needs of children and in enabling parents to join the workforce. Childcare is multifaceted and any strategy which seeks to address the problems associated with childcare provision must recognise this.

Good quality childcare can play a key role in child development, particularly when childcare services and early years education are linked. This lays a sound foundation for educational achievement in later years. Early investment reaps advantages for children by giving them the best start in life. Additionally, today's children are the workforce of the future and it makes sense to invest in them from an early age. The years of 0-3 are the most important years in child development.

The lack of affordable and available childcare is a barrier to work. Year-on-year our Childcare Cost Surveys show the struggle parents face in balancing work and childcare. The 2015 Childcare Cost Survey showed that 46% of parents (of 4,943 respondents) changed their working hours, by either reducing the number of hours worked or leaving work altogether,

because of the high cost of childcare. Many parents commented that the lack of available and affordable childcare services caused them to reconsider whether it was worthwhile staying in work. In many cases women are directly affected by this as they are more likely to be viewed as the main carer. When parents leave work due to childcare responsibilities this has a knock-on effect on the economy. Affordable and accessible childcare provision is necessary to enable parents to enter employment, stay in work and contribute to the economy. Furthermore, the childcare sector itself, in terms of workforce, contributes to the Northern Ireland economy. Increased childcare provision in turn increases jobs within the labour market.

To what extent the interventions set out in the strategy will help meet these aims will be discussed later in our response.

Objectives

We broadly agree with the objectives of the strategy, however we would like to make the following amendments:

- Objective 6 – “Detailed and up to date information on the childcare sector that is readily available to parents, allowing them to make informed choices regarding the childcare services they use”.

The provision of timely information is essential for helping parents source suitable and affordable childcare. In 2015, 38% of parents in our Childcare Cost Survey found it difficult or very difficult to access information on affordable childcare in their area. 47% found it difficult or very difficult to access information on flexible childcare services. We are pleased therefore that one of the objectives of the strategy is to make this type of information readily available to parents. However, considering that the cost of childcare is a barrier to work for many parents and that for those using childcare the bill can cause families to struggle financially, we are disappointed that this objective does not include the specific provision of advice and information on the financial help available with the cost of childcare. We believe that this type of support is essential for families availing of, or looking for, childcare. Considering that there is current financial help available to families, of which take-up rates in Northern Ireland are low (indeed 51% of parents this year told us that they were unsure that they were claiming all the financial help available to their family) we are disappointed that the objectives of a ten-year childcare strategy do not include the promotion of such vital support. Furthermore, the landscape of family support with regard to childcare costs will change dramatically over the next couple of years, with the introduction of Tax-Free Childcare, changes to Tax Credits, the possible introduction of Universal Credit and the closure of the Childcare Voucher scheme to new entrants. It is essential that parents can easily access information on these types of support. We recommend redrafting the objective to read:

“Detailed and up to date information on the childcare sector, *and the financial support available to families*, that is readily available to parents, allowing them to make informed choices regarding the childcare services they use”.

- We propose including an eighth objective:

“Childcare services that support the needs of working parents in terms of flexibility, regarding availability of service and opening hours.”

Considering that one of the aims of the strategy is to aid the employment of parents, none of the suggested objectives meet this need from the perspective of childcare settings practically supporting parents. The interventions touch on flexible childcare, therefore one of the objectives of the strategy should address this as an important issue also.

Actions

The actions state that this strategy will require co-ordinated action across a range of government departments and services. We welcome this acknowledgement, as childcare policy spans across a number of government departments; DE, DSD, DARD, DEL, DETI, OFMDFM and DHSSPS. It is essential that each of these departments work together for the strategy to meet its aims and objectives. We welcome the Children's Bill, which recently passed its final stage, as a measure which will ensure that departments take a more co-ordinated and integrated approach to childcare policy. Each of the outlined Interventions (1-22) should be assigned, where possible, to a specific department who will take responsibility for implementing the plans laid out under that Intervention.

We are disappointed that a lead department has not been detailed in the strategy. We would be interested to discover if the Department for Education will take on this role in 2016, as previously announced? Although this is an Executive Strategy and requires co-operation between the various departments, we firmly advocate that one department must take overall responsibility for childcare, underpinned by a commitment from all Executive Ministers to co-operate and work in partnership. As members of the Early Years Strategic Alliance, we believe that responsibility for childcare would sit best under the new Communities Department.

The documents refers to the 15 Key first actions under the Bright Start Framework, commenting that these actions will be replaced by the 22 areas of development set out in the draft strategy. It would have been useful for the document to provide an update on the progress and achievements of the Bright Start Framework. In general, it is difficult to ascertain what has been achieved under each of the Key First Actions. Furthermore, to the best of our knowledge some of the key first actions have not been implemented or progressed, for example Key First Action 10 which sought to promote the financial assistance available to families with the cost of childcare. Page 19 of the document states that a "full account has also been taken of the Key First Actions, including their current and projected performance". We would ask that this be made available.

Vision

It is important that the vision reflects the multifaceted nature of childcare. The vision contained in section 4.1 outlines the main features a childcare strategy should hope to achieve, however we have included some inserts which provide a more comprehensive vision for childcare, these are in italics.

"Every child, parent and family will have access to affordable, integrated, quality childcare. Through childcare, *we will support the development needs of children*; we will support the transformation of our society, promoting equality, social inclusion and social mobility. We will use childcare as a stepping stone to lifelong achievement, from formal education into adult life. Through childcare, we will instil lifelong respect for diversity. By making affordable childcare services more widely available *and enhancing the information available to parents*, we will enable all parents, but especially mothers, to join *and remain in* the workforce. In this way, childcare will contribute to greater gender equality. Finally, by developing local childcare services, we will create childcare jobs and develop the skills of people working in the childcare sector".

2. Comments on the proposed Interventions in the Childcare Sector

As part of the co-design process a range of stakeholders were both interviewed and involved in a series of group sessions with OFMDFM officials to discuss the key actions a childcare strategy should contain. After the co-design process we were expecting a full and complete strategy to

be released for consultation, containing firm commitments and actions to address the problems associated with childcare provision. This should outline the actions which will be taken and how these will be tracked and measured over the ten year period. The document that has been released contains, for many of the Interventions, designated areas which require extensive further examination and research before (or if) actions can be developed to address the problems associated with childcare.

This is research which should have been conducted before the draft strategy was released, resulting in a series of firm actions which can be consulted on and carried forward as part of the strategy. For example under Intervention iv: Supporting Private Sector Childcare Providers there should be a commitment to roll out a grant/loan scheme to private sector providers, not a commitment to explore the feasibility of this. An exploration exercise is not a commitment to support private sector providers. It is disappointing that so many of the proposed Interventions contain similar approaches.

Furthermore, it was our understanding that the Strategic Investment Board (SIB) were commissioned to explore possible interventions. According to a briefing provided to the OFMDFM committee on 6 March 2013, OFMDFM commissioned the Strategic Investment Board (SIB) to:

“Examine factors relevant to childcare, such as need, cost and capacity, and to start identifying, assessing and costing options for intervention. That research, which is being undertaken by the Strategic Investment Board (SIB), will identify potential options for government intervention in the provision of childcare and, ultimately, produce, if necessary, a business case for any preferred option”

The Bright Start Framework document indicated that that research was still taking place at the time of publication in September 2013. We would be interested to discover the options explored though this commissioned research and how many of these feature in the draft childcare strategy. 14 of the 22 proposed interventions (64%) require further research and examination and the commitment is to carry out this work, not to provide measurable actions.

The draft Childcare Strategy outlines 22 interventions; our response will comment on all of the actions mentioned in the strategy, these will be discussed under each of the sections of the draft strategy.

Supporting Increased Childcare Provision

The School Age Childcare Grant Scheme will be formally evaluated in 2016

We welcome the evaluation of the School Age Childcare Grant Scheme as it was considered to be one of the most prominent and ambitious Key First Actions of the Bright Start Framework. However, considering that phase three of this funding programme will not be open for applications until late 2015, a phase which will seek to attract more new providers than the previous two phases, can a full and proper evaluation be carried out at during 2016?

The following four actions, Interventions i-iv, rely on the evaluation of the School Age Childcare Grant Scheme, particularly the possible expansion of the scheme for all types of childcare. To date the scheme has sustained or created 2,300 childcare places. The Bright Start Framework aimed that it would create or sustain 7,000 places; with at least 3,000 of these new places. Currently the scheme has sustained 1,600 places, but only created 700 new places in the first two phases. The third phase will focus its attention on new providers. It will be interesting to see what a positive evaluation result will entail. Furthermore, if the evaluation is negative will there be an alternative approach for addressing school age childcare, or indeed services for the 0-4 and 12-14 age groups, which hinge on the evaluation of the School Age Childcare Scheme?

These options are not set out in the strategy and considering that the evaluation will take place during the ten-year strategy period, actions to address these needs in the event that the evaluation produces negative results, should also be set out.

Intervention i: School Age Childcare Grant Scheme

We commend the extension of the School Age Childcare Grant Scheme. However, it is estimated that over the ten year period the scheme could create as many as 18,500 childcare places. How is this figure calculated? Between 2014 and 2015 the scheme created 700 new places, and it is too soon to tell if these will be sustainable beyond the three year funding allowance.

The School Age Childcare Grant scheme provides low cost childcare places, the third round of funding will be focused on schools. It must be noted that there is a need for partnership between the leading childcare department and the Education and Skills Authority to ensure that there is a consistent cost across providers so that all parents can avail of available wraparound care and can avail of a low cost despite the setting they choose.

Intervention ii, meeting the needs of the 12-14 year old age group

It is important that the childcare needs of all children are explored to ensure that every child who needs a childcare place can access one, as the document states. However, as with many of the actions detailed in the draft strategy, this is only a commitment to 'examine options' to address the needs of the 12-14 year old age group, no indication is given to what this will entail or the types of programmes/measures which could be implemented as a result.

Intervention iii, supporting childcare for 0-4s

The introductory sections of the draft strategy document make reference to the overall provision of childcare places. Based on the economist's evaluations set out in page 22 of the document there is 'extreme under provision' in Northern Ireland. The document comments that 44,000 of the 56,000 childcare places currently available are aimed at the 0-4 age group. However, this total includes playgroup provision, totalling 11,885 places. We disagree with including the places provided by playgroups in the total count of childcare places. One of the aims of the childcare strategy is to help parents access and remain in work. Playgroup care typically only lasts for around two and a half hours per day, usually for 38 weeks in a year. This type of care does not support working parents.

The types of childcare which support working parents are childminders, day nurseries and school age childcare. Taking the total of these places and 'other' forms of provision (including Approved Home Childcare) there are 44,028 childcare places. Considering that economists estimate that the various types of childcare referred to in the 56,000 places estimate represent a 'high degree' of under provision, this underestimates the actual level of under-provision.

If the grant scheme cannot be extended for this age group what other measures can be implemented to address the need? Furthermore, providing for the 0-4 age group requires settings to adhere to a different set of rules and regulations, for example higher staff to child ratios, and longer set hours, therefore the existing grant scheme cannot be easily extended to cover the needs of this group, the level of funding available, in particular, would need extensively enhanced.

Intervention iv: Supporting Private Sector Childcare Providers

This intervention is another commitment to 'look into the feasibility' of support, rather than committing to provide support to private sector providers. It is unclear why this project will take place as part of the evaluation of the School Age Childcare Grant scheme, considering that it is a

new development and does not focus exclusively on school age childcare. Furthermore, the intervention also commits to 'look at options' for assisting childminder networks. These are also mentioned as part of Intervention ix, is this a separate study, or are both Intervention iv and Intervention ix dependent on the evaluation of the school age childcare grant scheme?

The intervention, 'if feasible' hopes to provide up to 1,500 places, we would be interested to discover how this estimate was calculated.

We agree with supporting the private sector as it provides the bulk of existing childcare places, which are invaluable to parents. The introduction of the Living Wage from next April has raised concerns amongst private sector providers, therefore the strategy should provide support to these businesses, particularly at this time.

Intervention V: Supporting Private Firms to Provide Childcare

This intervention comprises of three more commitments to research a particular option, rather than a firm commitment to provide support:

- To 'look at how' private firms might provide onsite childcare – there is no detail on what this research will involve;
- To 'assess the feasibility' of providing some initial assistance with running costs and small capital works, and;
- To 'review how' private sector providers might provide childcare on behalf of the statutory sector.

The provision of onsite childcare is hugely beneficial for working parents, not only because childcare situated in the workplace is convenient, and will assumedly mirror the opening hours of businesses, but because parents can make greater savings on their childcare costs through the Workplace Nurseries Exemption Scheme – a provision which the draft strategy makes no reference to. For employees using a workplace nursery, the whole childcare cost is Tax and National Insurance Contribution free, helping parents save up to a third on their childcare bill. This can be very helpful particularly considering that 61% of parents in this year's Childcare Cost Survey struggled with the cost of childcare either throughout the year or at some point during it.

These interventions therefore could be beneficial for parents and employers, enhancing overall childcare provision which is flexible, affordable and suitable for working parent. We are disappointed that the actions under this intervention are not definite and hope that the full strategy will implement some actions around the provision of childcare support to private firms.

Intervention VI: Supporting Community Based Childcare Providers

This intervention appears to be a firm commitment, yet it is dependent on achieving EU Peace funding, if funding is not achieved will this action fail to be put in place?

Intervention VII: Supporting Cross Border Childcare Services

It is commendable that the draft strategy desires to address rural childcare needs though this intervention, yet again this intervention is dependent on EU Peace funding. Once again, if funding is not achieved will this area of need be addressed?

Furthermore, how will these cross-border childcare settings be registered? The Republic of Ireland and Northern Ireland have different legislation and systems of registration. Failure to ensure that the childcare settings are registered in Northern Ireland will mean that parents will be unable to access financial support with the cost of using these services. This could potentially leave families worse off.

Intervention VIII: Capital Fund for Childcare

This intervention is also a commitment to explore a particular area, rather than to enact necessary change.

We support the provision of financial assistance to private providers to expand services. As per our comment under Intervention IV, the introduction of the Living Wage from next April has raised concerns amongst private sector providers, and therefore the strategy should provide some support to these businesses, particularly at this time.

Intervention IX: Rural Childminding Services Model

The document states that as a result of further research the affordability of childminding services in rural areas is a larger problem than availability. It is our understanding that this conclusion was drawn from an analysis by the Department of Agriculture and Rural Development (DARD), it would be useful if this paper could be made publically available.

Our annual Childcare Cost Surveys show that affordability is one of the largest, if not the main, problem associated with childcare provision in Northern Ireland. Therefore it is not surprising that childcare affordability is a key problem in rural areas. Even if childcare provision is available to parents, if it is unaffordable it becomes inaccessible for parents. We welcome any measure which will address the affordability of childcare.

The draft strategy commits to "look at" the needs and rationale of progressing a centrebased childminding hub or a childminding network approach. We would welcome more detail on both of these models and how they will address affordability. Furthermore there are already four childminding networks in existence in Northern Ireland, how will the proposed networks differ from those already operating and is there a possibility of extending existing networks rather than starting again from scratch?

There is a need for a childcare network which childcarers can join which offer training, networking opportunities and business support. This could be included in the proposed networks or hub.

The draft strategy also 'intends' to mainstream rural childcare needs across the full range of actions in the Childcare Strategy. This is commendable and should be specifically included in the objectives which underpin the strategy if it is to be achieved.

Intervention X: Transport Services Supportive of Rural Provision

We welcome any action to address the transport needs of rural childcare provision and the extension of the Bright Start action in this area, however it would be useful to have detailed information on the progress of this key first action, particularly if it is to be carried forward in the full strategy.

Intervention XI: Childcare for Children with a Disability

We agree with actions to address the childcare needs of children with a disability, as we know from our own research and work with parents that childcare can be particularly difficult to access and is more expensive than other formal childcare services. We are pleased that a firm commitment is given under this intervention to "ensure that every child with a disability that requires a childcare place can access provision appropriate to his or her needs".

The document suggests extending the measures taken under Bright Start, and will review the feasibility of continuing similar assistance. At this stage the document states that this will take place as part of an evaluation of the first phase, which seems to contradict the statement on

page 19 which states that a “full account has also been taken of the Key First Actions, including their current and projected performance”. Has an evaluation of Bright Start been completed or is the evaluation mentioned here similar to the evaluation of the School Age Childcare Grant Scheme? If so, if the evaluation is negative what measures will be taken to achieve the commitment for children with a disability?

Intervention XII: Flexible Childcare

We welcome a focus on flexibility of childcare services but disagree that the majority of childcare settings are available during regular business hours. Although we agree with this need, the strategy must also acknowledge that many childcare settings do not exercise enough flexibility for parents working ‘typical’ hours. Indeed in our 2013 consultation with parents to inform our ‘Towards a Childcare Strategy’ consultation response 96% of parents stated that they agreed with the objective of all childcare settings being open from at least 8am to 6pm. When asked for their preferred opening and closing times, 52% of parents stated that they would like childcare settings to open between 7am and 8am in the morning. 62% stated that they would ideally like childcare settings to close after 6pm in the evening.

Many of the parents we work with through our Family Benefits Advice Service comment that their childcare provider opens too late or closes too early. This is a particular problem with school age childcare provision, especially in school provided provision. In 2012 we carried out research with primary schools in Northern Ireland. 342 schools responded and of those which offered wraparound childcare, 34% of afterschool clubs closed at 4pm, and only 41% opened until 6pm in the evening – making it particularly difficult for working parents (especially those working full-time) to make use of the care provided.

We agree with the strategy’s acknowledgement that childcare must be available for those parents working atypical and unconventional hours, however it must also ensure that at its core the childcare infrastructure supports the majority of parents who work typical hours, ensuring that at a minimum all settings open between 8am and 6pm.

Beyond this, as working hours change, there is an increasing need to address the needs of workers who are employed outside ‘traditional’ hours and we welcome the strategy’s proposal to address this. We call for a firmer commitment beyond exploring options, by putting in place time bound, measurable actions to address this need.

The strategy’s proposal to ‘consider developing’ a cohort of centre based staff who can work in a centre or as childminders is a duplication of existing services. Employers For Childcare Solutions is just one provider which offers such a service. Rather than starting from scratch the strategy should look at funding existing and established services, enabling them to scale and progress. This will be quicker to implement and more beneficial for the sector and for parents.

This intervention also includes the statement “the strategy will encourage employers to adopt family friendly working policies”. We welcome this commitment and agree that employers have a role to play in facilitating the work life balance of their employees. Our recent report, ‘Striking the Balance: the impact becoming a parent has on working life, employment and career’, showed that 91% of our 4,200 respondents stated that it was difficult to combine work with family commitments and responsibilities. Parents with supportive employers were more likely to be happy with their work-life balance than those with unsupportive employers. Therefore we agree that a Childcare Strategy should encourage employers to be more family friendly. We work with employers to help facilitate work life balance policies and would be happy to work with the Executive in delivering this aim.

Intervention XIII: Public Sector Franchises and Private Managed Provision

This intervention contains another proposal which seeks to consider an option rather than committing to an action. The intervention will “consider” making available unused rooms and buildings on the public sector estate to childcare providers. This proposal could be hugely beneficial to working parents, particularly if public sector employers were involved in the management of the childcare setting whereby enabling parents to avail of the workplace nurseries exemption scheme. This intervention should be linked with Intervention V, and considering that the public sector is the largest employing sector in Northern Ireland, it could be to the benefit of a wide range of working parents.

This type of scheme could be used to provide short term childcare, for example to cover school holidays, if a long term option is not feasible. This could be particularly beneficial for working parents.

Intervention XIV: Childcare Places for Low Income Families

We agree that good quality formal childcare services can greatly benefit children’s development, and that all children should be able to access childcare, particularly those from low income families. In addition to the School Age Childcare Grant scheme, what other options will be included in the exploration of meeting the needs of these families? In addition, the funding available to Women’s Centres which currently provide vital childcare services to low income families is under threat. The strategy should commit to support the work of these centres in addition to looking at other means of supporting these families.

Improving Childcare Services

Intervention XV: Improvements to Information

The availability of accessible and easy to understand information for parents on how to source suitable childcare, as well as information on available help with the cost of childcare, is vitally important for parents. Our 2015 Childcare Cost Survey showed that 38% of parents found it difficult or very difficult to access affordable childcare in their area and 47% found it difficult or very difficult to find information on flexible childcare.

The improvements to the Family Support NI website to date have been very beneficial for parents in finding local childcare services, however from our own work with parents we know that very few are aware that the website exists. There is a need to promote the Family Support NI website, and associated app, to parents to enable them to benefit from the information available to them.

We welcome any enhancement in information for parents and particularly agree with the commitment to making the information available in other languages. We also agree with making childcare inspection reports available online for parents to access. Parents in England can use the Ofsted website to view inspection reports and we agree with mirroring this system in Northern Ireland. We believe that this will help parents in choosing a suitable, quality childcare service for their children, and will also encourage childcare providers to improve their services.

It may be beneficial for a central source of information which provides parents with information of all provider’s current capacity, costs and other relevant information. This could be part of making inspection reports available online.

Although the proposed star rating system could work in theory, it would require extensive research to develop a system which could rate childcarers in a way which will benefit parents. We feel that making inspection reports available online will serve a greater purpose and will be more beneficial for parents in benchmarking suitable childcare providers. At a time of limited resources available funds should be invested widely and we do not see a star rating system as a

necessary expense at this time. There are other areas of information which need urgent investment and money could be better spent on these areas.

The accessibility of information extends beyond online resources, therefore we also welcome other means of communicating information to parents, in particular providing information in Bounty Packs to all new parents. The provision of information on the financial assistance available to families is particularly important to deliver at this stage. Any communication should therefore contain information on family benefits and entitlements, including signposting information to services which can carry out personalised checks for families.

The draft strategy proposes to 'consider' a promotional campaign highlighting for parents the long term child development benefits of quality childcare services. In our 2015 Childcare Cost Survey, of almost 5,000 local parents, there was a clear awareness amongst respondents that children benefit from quality formal childcare services, with many parents calling for government to recognise the associated benefits and invest in quality childcare services which are available and affordable. The cost of childcare is the main barrier to parents accessing childcare provision. Indeed in our survey many parents who could not afford formal childcare regrettably commented that their children were missing out on the developmental benefits it offers. Therefore, although the message of the proposed promotion campaign is sound and important, considering the limited resources to implement this strategy, we firmly believe that funds are better targeted at removing the affordability barrier for parents, enabling them to use childcare, for the benefit of themselves and their children. Ensuring that parents are aware of all financial support with the cost of childcare is vitally important in achieving this, a childcare strategy should invest in making parents aware of the support available for their specific circumstances. We ask for the strategy to include a firm commitment to ensure that all parents are aware and availing of the support available with the cost of childcare, for their individual circumstances. The main types of financial assistance with the cost of childcare come from the UK Government, therefore increasing uptake will benefit local parents, children and the economy, but at the same time will not cost our Assembly a penny beyond promotion costs.

In our 2015 Childcare Cost Survey, 51% of parents were unsure that they were claiming all the help available to them. This figure is largely a result of lack of awareness. We are pleased that the draft document will "promote the new support [Tax-Free Childcare] scheme as well as other forms of assistance", however details of how this promotion will take place are unclear.

Providing information on a website can ensure that parents can access information, however the support on offer is complex to understand and direct and personal advice is necessary to ensure that parents are availing of the correct support for their circumstances. This is particularly crucial considering that the landscape of support will change in the coming months. From next April a series of changes to Tax Credits will be made, furthermore the Tax-Free Childcare scheme will be introduced and the Childcare Voucher scheme will close to new entrants in 2017.

It is crucial that parents are aware of the coming changes to financial support as they will make it even more difficult for parents to navigate the types of support available to them and vitally which types will be more financially beneficial to them. For example many parents are unaware that if they join the Tax-Free Childcare scheme they will lose eligibility for Tax Credits, a detail which is not widely publicised but will be financially detrimental for numerous families. The draft Childcare Strategy fails to put in place measures which will address the issue of awareness.

It is already very confusing for parents to work out what is the best support in their circumstances, personal advice is necessary in ensuring that every parent is claiming the correct support. The document states that it will "review the best options for directly advising parents on the support available". Page 17 of the document states "we will promote the financial

assistance currently available with the costs of childcare, by supporting existing advice services within the programmes, to ensure that all parents eligible for this support are benefiting from it". The action to "ensure that all parents eligible" are claiming support should be included in the 22 Interventions and should be a firm and flagship commitment. A promotional drive similar to the 'make the call' campaign referring parents to relevant services is necessary if all parents are to fully understand the support available to them. Funding should be made available to roll this out urgently.

Services, such as our Family Benefits Advice Service, already exist to provide parents with information and personal advice on their entitlements. Our service is well-established, but we have limited resources to promote it widely enough to ensure that all parents are fully aware of their entitlements. To date in 2015 we have advised almost 4,000 parents of their entitlements and carried out around 150 roadshows across Northern Ireland. The average increase in benefits and entitlements is £1,429 per household. There are many more parents who could be availing of support but are unaware of their entitlement. This is another instance where funds could be directed at existing services to meet the needs of the strategy, this is both effective and saves time and money.

Interventions XVI-XVIII Workforce development

Investment in the childcare workforce is essential for developing and maintaining a quality childcare infrastructure for Northern Ireland. We agree with any policy which will enhance the skillset of the childcare workforce. It will be interesting to see the Skills Audit being carried out by the Childcare Partnerships and we hope this will be made available upon completion.

We agree that any improvements to the childcare workforce should be continuous, guaranteeing a high quality childcare sector.

An issue which must be addressed is the cost of completing childcare qualifications. Childcare courses can be expensive and unaffordable for childcare providers. The strategy should provide funding to help childcares achieve their training goals. This could be included under intervention IV and linked with Intervention XVI.

Investment in organisations already providing training to childcarers should also be included in the strategy, such as Blaris Training Solutions, a new social enterprise which provides training, including Childminder Core Training packages as well as continual professional development training with soft skills, such as Promoting Positive Behaviour, Phonics, Developmental Milestones and Play.

Intervention XIX: Childcare Stakeholders' Panel

We agree with retaining the Programme Board to manage and monitor the performance of the full strategy. It is vital that a set of performance indicators, targets and outcomes are both set out clearly and adequately monitor the progress of the strategy. We agree with the publication of an annual progress report and a formal evaluation of the strategy's progress at the mid-term.

We are pleased that the strategy contains a commitment to a Childcare Stakeholders' Panel as the sector contains much first-hand knowledge and expertise on all aspects of childcare. We would hope to be included on the panel.

Joined Up Childcare

The body of the text contains a number of actions under the 'Joined Up Childcare' heading, although only one Intervention is detailed. We will comment on all the mentioned actions under the heading:

“This Strategy will review options for supporting informal carers such as providing information and guidance and establishing local networks to enable informal carers to meet and share experiences”

“The Strategy will look closely into local use of informal childcare, the experience of local informal childcarers, and the developmental benefits of the care provided”

Informal childcare meets the childcare needs of many families. Whether it is an option taken by parental choice or as a reaction to the failings of the existing childcare infrastructure, the role informal carers provide is invaluable. We are pleased, therefore, that the strategy will ‘review’ options for supporting informal carers and hope that this will become a firm commitment.

In the 2015 Childcare Cost Survey almost half of families (49%) relied on informal childcare, either on a full-time or part-time basis, to make up their weekly pattern of childcare. On average, for those families using a mix of formal and informal care, 20 hours per week was provided through informal childcarers, of which 78% were grandparents.

The help of grandparents is invaluable for families, and for the majority of parents the reason for using informal care was because of the high cost of formal childcare services. Although this was the main reason, parents also commented that grandparents also provided flexibility which formal services did not offer.

Parents commented on the benefits of using informal childcare, including children being in a home environment, bonding between grandparents and grandchildren, a stronger relationship between grandparents and grandchildren, and that grandparents can contribute to the children’s upbringing. Many parents also commented on the benefits, particularly the developmental benefits, of formal childcare. Those parents who were able to afford some hours of formal childcare, because of the help of grandparents, were grateful that their child was able to experience time in a formal childcare setting, as well as benefiting from informal care. Other parents who simply could not afford to use formal childcare were regretful that their child/ren missed out on the benefits of formal childcare.

A childcare strategy should facilitate parental choice. Some parents will choose to use informal childcare and they should be supported to do so. It is therefore positive that the strategy will review options to support informal childcarers. One way this could be achieved is through the provision of training to informal carers to increase their confidence and skills, for example the provision of paediatric first aid, understanding phonics, or dealing with difficult behaviour courses/workshops. These will support informal childcarers and can also address concerns about the developmental benefits of informal childcare.

However in addition, the strategy should ensure that those who want to use formal childcare are not prohibited from doing so due to cost or flexibility issues. Although we agree with providing support to informal childcarers, we cautiously welcome the research into the local use of informal childcare and the experience of informal childcarers, we are concerned that funds dedicated to this area will not be as effective in addressing the childcare needs of families as, for example, targeting funds at removing the barriers which prohibit families from accessing formal childcare services, such as unaffordability.

“Possibility of providing training and induction packages to attract new entrants to childminding will also be examined”

There are already organisations who provide training and induction packages to new childminders, such as Blaris Training Solutions. Funds should be targeted at supporting and enhancing the support already available through these well-established and trusted services. We

also advice that any core Childminding training package should include business and marketing support to ensure sustainability.

Intervention XX: Promotion of registered childcare

We are pleased that this intervention contains a firm commitment with a time line, to end unregistered childcare by 2025. We would welcome further information about how this will be achieved, but note that the availability of inspection reports (Intervention XV) if promoted well could act as a vital tool for parents choosing formal childcare and as such could factor in to encouraging unregistered providers to register. Furthermore, the proper promotion of available financial support should also act as an incentive as only those parents using registered childcare can avail of Government help with their childcare costs.

There must be in place confidential support for unregistered childcare providers to encourage them to become registered without the worry of being prosecuted. This should be a commitment, as particularly in rural areas unregistered providers can be unaware that it is illegal or that they began operating for family and friends and took on other children without the intention of ever setting up a business.

“The Strategy will work to ensure greater complementary between childcare and formal education...all will prepare children for education or complement ongoing education”

We believe that childcare and education should be inextricably linked. The integration of childcare and education, referred to as ‘educare’, is central to the childcare strategies in the other regions of the UK. This emphasis is grounded in ensuring that every child has the best start in life. As such, in England, all children in formal childcare benefit from the Early Years Foundation Stage. In Northern Ireland due to departmental structuring, childcare and education are very much viewed as separate and distinct policy areas, with no overlap. We would be interested to receive more information on how the strategy hopes to achieve greater complementary between childcare and education, and how progress in this Intervention will be measured.

Changing the Childcare Context

Intervention XXI: Regulation and Inspection

We agree with working with existing providers to ensure that the regulation and inspection process is as straightforward and hassle-free as possible. Is there a possibility of outsourcing the inspection of childcare settings to an external body? The inspector would follow the regulations set out in the Children Order 1995 and the Minimum Standards and the process could be overseen by a Social Worker. This could lessen some the burden on Social Workers, freeing up their time for other duties.

Intervention XXII: Review Options for Statutory Responsibility

We fully agree with ensuring that there is sufficient childcare in local areas to meet parental need. We welcome the duty which will be delegated to the Childcare Partnerships to ensure that going forward the obligations under the Children Order are upheld in this area. It is vital that all parents and families can access childcare provision to meet their needs, including 0-4 provision, wraparound care, flexible childcare, rural childcare and childcare for children with disabilities and/or special needs.

3. Employers For Childcare’s Key Asks

Employers For Childcare welcomes the development of a childcare strategy for Northern Ireland. For many years we have been calling for the Executive to address the many problems associated with childcare provision. This section sets out our main asks of the Childcare Strategy.

We welcome the draft childcare strategy and broadly agree with its aims of addressing the developmental needs of childcare and supporting parental employment, however there are six key points we would like to raise. We are calling for:

1. A progress report on the Bright Start Framework Key First Actions

It would be useful for OFMDFM to provide an update on the progress and achievements of the Bright Start Framework. In general, it is difficult to ascertain what has been achieved under each of the Key First Actions. Furthermore, to the best of our knowledge some of the key first actions have not been implemented or progressed, for example Key First Action 10 which sought to promote the financial assistance available to families with the cost of childcare. Page 19 of the draft childcare strategy states that a "full account has also been taken of the Key First Actions, including their current and projected performance". We would ask that this be made available.

2. More firm commitments in the development of the Childcare Strategy

Many of the interventions suggested in the draft strategy are commendable, however, the majority contain a commitment to explore/review/assess the feasibility of the proposed idea, rather than a commitment to put in place measures to implement the proposal. For example the draft strategy commits to:

- *"Look at how private firms might meet the childcare needs of their employees through onsite childcare"*
- *"Review how private sector providers might provide childcare on behalf of the statutory sector"*
- *"look at options for assisting childcare providers with the capital costs of expanding their services"*
- *"Consider making available, on a pilot basis, unused rooms and buildings in the public sector estate"*
- *"Review the best options for directly advising parents on the [financial] support available"*
- *"Consider developing, on a pilot basis, a cohort of centrebased staff"*

Many of the proposed ideas, such as those mentioned above, could help address childcare provision. In particular we support the development of on-site childcare (iv), the provision of a capital fund for childcare (viii), flexible childcare (xii), public sector franchises and private managed provision (xiii), support for informal childcarers, childcare places for low income families (xiv), improvements in information (particularly the provision of information on financial support) (xv), and the continuation of a Programme Board which will regularly report on progress (xix), as well as measures which ensure that suitable, quality childcare provision is readily available to all who require it.

Going forward we call on the Executive to ensure that the full Childcare Strategy will put in place these actions and make firm commitments to implement them, alongside a range of performance indicators, targets and outcomes against which progress can be tracked.

3. Targeted investment on crucial areas of need

The document comments the funding available for the strategy is constrained. Indeed the strategy omits funding figures. It is concerning therefore how any of the plans can be rolled out. We ask that the strategy will outline the budget required and the amount that will be dedicated to the strategy to allow the implementation of the interventions outlined. It is crucial that any available funds are targeted at areas of need, firstly though targeting support at the most prominent areas and secondly through supporting the expansion of existing services.

Addressing Affordability

It is apparent from our yearly Childcare Cost Surveys that the cost of childcare is one of, if not the main, problem associated with childcare provision which is faced by parents. Even if childcare is available and flexible, if it is unaffordable parents cannot access it. Affordability must be an underpinning factor of the strategy.

Our annual Northern Ireland Childcare Cost Surveys (2010-2015) provide evidence for the need to assist parents in sourcing affordable, suitable and flexible childcare. The lack of affordable childcare is arguably the main problem associated with childcare provision in Northern Ireland. In 2015, our survey of almost 5,000 parents showed that:

- 61% struggled with their childcare costs either throughout the year or at some point during it.
- The childcare bill is the largest monthly outgoing for 25% of families and the largest outgoing after housing costs for the majority of families.
- 56% of parents said their childcare costs put them under increased financial pressure.
- 24% of parents regularly relied on other means to meet their childcare bill, such as credit cards, overdrafts, loans from family and friends or payday loans.
- The average cost of a full-time childcare place is £164 per week per child.

A childcare strategy should therefore seek to address this problem and make childcare affordable for families. At a time of limited resources any money spent should be invested wisely and targeted at ways of addressing the problem of affordability.

We believe that the funds which will be required to put in place some of the proposed interventions could be better invested elsewhere. For example, under Intervention XV the document states it will 'Examine the feasibility of developing a system of star ratings for childcare settings'; considering that the document will seek to make the full inspection reports of all childcare settings available, a resource which could be more beneficial for parents than a star rating system, this is an action for which money could be better invested elsewhere. In addition, other proposals such as the proposal to "look closely at the local use of informal childcare" or one which will "examine the reasons why people use unregistered childcare providers", or "to look closely at the local use of informal childcare" could be better spent on other areas, such as the promotion of the financial support available to families with the cost of childcare, or supporting childcare providers to provide low cost places to low income families.

The majority of interventions should seek to address the unaffordable nature of childcare. Interventions such as the development of onsite childcare, flexible childcare, supporting private providers and enhancing information, amongst others, can help make childcare more affordable, and therefore accessible, for parents. These are areas which can create a greater impact and should be prioritised for investment when funds are limited.

Supporting existing services

Some of the proposed interventions, such as the development of a "cohort of centrebased staff" and the possible provision of "training and induction packages" for new childminders, are

already provided through the community/voluntary sector. Money is better spent investing in the expansion of these existing services, rather than starting again from scratch.

For example, at Employers For Childcare we provide training to informal carers and potential childcarers through our Blaris Training business. We provide childcare recruitment services, including a bank of childcare providers who can work atypical hours, through our Childcare Solutions business. We also provide confidential and specialist advice and information, with a particular focus on family benefits and entitlements, through our Family Benefits Advice Service. Through our charity services we encourage employers to implement family friendly working policies, including on-site childcare.

Furthermore the funding available to Women's Centres which provide vital childcare for low income families is under threat. The strategy should continue to support the work of these centres instead of looking into other means of supporting these families.

There are many examples of organisations providing services which meet the needs of the childcare strategy. These are services which are well established. Investing in already existing services is more efficient than starting again from scratch.

4. Ensure all parents are aware of the financial support available to them

We ask for the strategy to include a firm commitment to ensure that all parents are aware and availing of the support available with the cost of childcare, for their individual circumstances.

In our 2015 Childcare Cost Survey, 51% of parents were unsure that they were claiming all the help available to them. This figure is largely a result of lack of awareness. We are pleased that the draft document will "promote the new support [Tax-Free Childcare] scheme as well as other forms of assistance", however details of how this promotion will take place are unclear. Providing information on a website can ensure that parents can access information, however the support on offer is complex to understand and direct and personal advice is necessary to ensure that parents are availing of the correct support for their circumstances. This is particularly crucial considering that the landscape of support will change in the coming months. From next April a series of changes to Tax Credits will be made, furthermore the Tax-Free Childcare scheme will be introduced and the Childcare Voucher scheme will close to new entrants in 2017. It is already very confusing for parents to work out what is the best support in their circumstances, personal advice is necessary in ensuring that every parent is claiming the correct support. The document states that it will "review the best options for directly advising parents on the support available". This should be a firm and flagship commitment, a promotional drive similar to the 'make the call' campaign is necessary if all parents are to fully understand the support available to them. Funding should be made available to roll this out urgently.

5. Addressing contextual factors

The draft strategy fails to take into consideration contextual factors which will impact upon childcare costs, namely the changes to financial support and the introduction of the National Living Wage.

It is expected that from next April a series of changes to the financial support available to families will commence, beginning with a number of changes to the way Tax Credits are calculated and awarded. Department of Social Development estimates suggest that 121,000 local households will see their Tax Credit award reduced as a result of the changes. The draft strategy fails to take into account the impact of these changes on local families, many of whom are already under extreme financial pressure due to the cost of childcare. There is therefore a greater need to ensure parents are claiming all the available financial help for their

circumstances and are prepared for the forthcoming changes. Furthermore, a commitment to addressing affordability of childcare services will ease the burden on family finances helping to alleviate some of the impact the Tax Credit cuts will have.

In addition, the introduction of the National Living Wage from next April, which will increase the minimum wage of workers aged 25 and over to £7.20 per hour, will have consequences for both parents and childcare providers. Many childcare workers are paid minimum wage and as such nurseries and out of school clubs will have to offer increased pay. Some representatives from the childcare sector have already raised concerns about this increase and the impact it will have on childcare costs.

The draft strategy focuses on the quality of the childcare workforce, which is a vital area which requires investment. However good quality costs and the effect of this on childcare businesses, coupled with the rise in Living Wage, can impact on the sustainability of childcare settings. The draft strategy should address this by supporting childcare providers and enabling parents to afford childcare services through the promotion and provision of financial assistance.

6. Flexibility as standard

The underpinning objectives of the strategy should include flexibility. Childcare settings which are not flexible do not support working parents. Furthermore, although flexibility is a key issue, many settings do not have suitable opening and closing times for working parents in the first instance, such as those closing at 4pm or opening after 8am. The strategy should commit to ensuring that all childcare settings open as standard between 8am and 6pm to facilitate working parents.

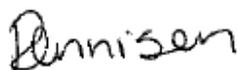
The draft strategy commits to rising the number of childcare places to 100,000 by 2025. However unless the places available are affordable and flexible they are not suitable for working parents. The focus should not be on creating a set number of places but ensuring that all existing settings are sustainable, fully support parents and are accessible to them.

Conclusions

We are pleased that policy makers are working on developing a Childcare Strategy for Northern Ireland and we welcome many of the measures contained within the draft document. However, at a time of limited resources, and in the context of changes to vital family support, we believe that any money spent should be invested wisely and targeted at ways which will address the problem of affordability.

We would very much welcome the opportunity to discuss the points that we have raised in more detail with you. My contact details are rachel.dennison@employersforchildcare.org or telephone 028 9267 8200.

Yours sincerely



Rachel Dennison

Research and Policy Officer

Employers For Childcare Charitable Group