

21 December 2016

Programme for Government Team
Room 5.06
Castle Buildings
Stormont
Belfast
BT4 3SR

Dear Sir/Madam

Re: Programme for Government Framework Consultation Response

Employers For Childcare aims to support parents to access work and to stay in work. We encompass a campaigning charity which works on behalf of local parents and families, and three social enterprises, Employers For Childcare Vouchers, Employers For Childcare Solutions and Employers For Childcare Training. Our charitable activities include carrying out research on issues which impact on families, such as the annual Childcare Cost Survey series (2010-present), which tracks the cost of childcare and the impact high costs have on local families. We actively lobby for better support for families. We also operate the Family Benefits Advice Service. Our specialist Advisors work with parents to make them aware of the financial support available to them. We carry out personal benefits checks and advise on support with the cost of childcare.

We welcome the opportunity to respond to the Programme for Government Framework 2016-21 Consultation Document. Our comments on the document are outlined below.

Outcomes based approach

As stated in our response to the Draft Programme for Government Framework (July 2016), we welcome the Executive's Outcomes Based Approach to the Programme for Government. The Outcomes Based Approach is an opportunity to move away from silo based working and encourage a joined-up approach. We welcome the document's commitment to work across boundaries and traditional department lines; this is essential for the outcomes to be achieved. Many of the outcomes mentioned in the document will require actions which will stretch across Departments,

therefore we welcome the inclusion of the action plans for each of the outcomes to see how this will be achieved. We agree that the plans made through the Programme for Government are long term and will create change which will last beyond the current government period. Focusing on impact is a forward-thinking and progressive approach and we agree with this shift in policy development.

Purpose

We are pleased that wellbeing is the underpinning purpose of the Programme for Government, however we ask for a full and proper definition of what the Executive means by wellbeing.

We welcome that the purpose mentions both social and economic factors by addressing disadvantage and driving economic growth. We are hopeful that this signals the Executive's acknowledgement that social issues and economic issues are inextricably linked and should be addressed jointly. It is much welcomed that the Programme aims to tackle disadvantage, however this is a loaded term and again further definition is required.

Outcomes

The 14 outcomes are aspirational and few could argue with them. Taken together as end goals they are ambitious but worthy of achieving to ensure improved wellbeing for all. We are pleased that the structure of the Programme for Government has been simplified and that indicators are now linked to specific outcomes. We welcome further detail on the data which will be used to measure progress. In addition we are pleased that a commitment has been given to produce an annual report to the Assembly on progress against each indicator. However, the entire document is complex and in many cases there are overlaps in indicators for the various outcomes, with many action plans linking indicators. This makes the Programme for Government difficult to grasp and comment on.

We have set out our responses to relevant outcomes below.

Outcome 1: We prosper through a strong, competitive, regionally balanced economy

The role of Social Enterprises is not recognised under this outcome. Social Enterprises are profit making businesses which donate their profits to charitable activities. These businesses are competitive and innovative, indeed Northern Ireland has a vibrant and strong Social Enterprise

sector. These businesses benefit the local economy and labour market while also addressing key social issues. It is disappointing that Social Enterprise is not mentioned, particularly considering the overall purpose of the Programme for Government is 'Improving wellbeing for all – by tackling disadvantage and driving economic growth'. Indeed, the text supporting this outcome specifically mentions the need to address "social and economic challenges", the Social Enterprise sector is best placed to tackle and address these challenges.

The last Programme for Government committed to ensuring that social clauses were included in public procurement, yet recent research by NICVA showed that in very few cases social clauses were included in tenders. It is essential that this Programme for Government encourages the growth of the Social Enterprise Sector and the use of social clauses in public procurement.

Suggested indicator -

- Increase in the number of Social Enterprises.

Associated measures –

- Number of Social Enterprises operating in Northern Ireland.
- Measure of number of social clauses included in public procurement (this will involve the collection of additional data).

Suggested Actions –

- Include teaching about Social Enterprise in all school Business Studies curriculums.
- Grants to encourage start-up social enterprises.
- Introduce legislation similar to the Social Value Act for Northern Ireland.
- Refreshed commitment to include social clauses in all public procurement.

Outcome 3: We have a more equal society

In our response to the Programme for Government Framework we commented that this outcome should be reworded to read 'We have an equal society'. We still call for this change; the word 'more' is limiting, the end goal should be an equal society.

We are pleased this outcome has been expanded to encompass a broader range of underrepresented groups. However, much more emphasis must be directed at addressing income inequality and gender inequality, for example.

We are pleased the role of childcare has been recognised in supporting greater gender equality and improving child development for long-term improvements in educational equality. However, in addition to this it is also essential to ensure that parents are able to access employment, particularly mothers. The lack of affordable and suitable childcare must be recognised as a structural barrier to employment and should be addressed as such.

We still call for additional indicators and measures, such as:

Suggested indicators –

- Reduction/end of maternity discrimination.
- Reduction/end of the gender pay gap.
- Reduce educational inequality and improved educational outcomes (these are indicators for other outcomes but should also be included under this outcome).
- Literacy levels.

Suggested measures –

- Number of maternity discrimination cases.
- Rates of pay for men and women.
- Number of pupils leaving school (primary and post-primary) with high levels of literacy.

Suggested actions -

- Encourage the use of family friendly working policies.
- Early intervention – such as extending the free preschool year to all disadvantaged two year olds.

In addition to our comments, we request more detail on the 'Cost of Work Allowance' as this is not expanded upon in the associated action plans.

Outcome 4: We enjoy long, healthy, active lives

It is interesting that ‘supporting parents in their role’, which was included as a key role for the Executive in the Framework Consultation document, has been removed for this outcome.

The text detailing the issues surrounding the outcome states that “health and wellbeing, and health inequalities, are shaped by many factors, including family, community, workplace, beliefs and traditions, economics, physical and social environments” (page 57). The role of family in ensuring that children grow up in good health is essential, the role poverty plays in undermining this aim must be considered. For this reason we suggest the following:

Suggested indicators –

- Reduce in-work poverty.

Suggested measures -

- Reduction in in-work poverty.

Suggested actions -

- Better parenting guidance and support, particularly concerning financial support.
- Implement a robust Childcare Strategy.

Outcome 5: We are an innovative, creative society, where people can fulfil their potential

As with our comments on Outcome 1, the role of Social Enterprise must be recognised. Social innovation is at the centre of the Social Enterprise sector.

In addition early intervention through good quality childcare is also a long-term method of achieving this outcome, particularly concerning improving educational outcomes. It is disappointing that childcare is not recognised under this outcome.

Furthermore, the role of childcare in supporting the workforce and economy must not be overlooked for this outcome or those which seek to improve the workforce and economy. Without childcare parents cannot work and the economy suffers. Without good quality childcare an opportunity for early intervention is missed, especially for children in disadvantaged areas.

Outcome 6: We have more people working in better jobs

We welcome that this outcome recognises the role of employment in promoting healthy wellbeing, in addition we would like to emphasise the role employment plays in enhancing a family's financial stability. This is undermined however when the cost of work, such as the childcare bill, outweighs or consumes a large amount of earned income. The document states that a 'holistic approach' is needed, this must include addressing the barriers to work such as childcare. The lack of affordable and suitable childcare is a barrier to work for many parents, in many cases it prevents parents from entering or remaining in the workforce or limits the types of jobs they can apply for. Our research shows that childcare is a barrier to work and progression for parents; the 2016 Childcare Cost Survey showed that 50% of parents reduced their working hours or left work as a result of the high cost of childcare.

If the Programme for Government aims to "support and actively assist people to get into work", a fit-for-purpose childcare infrastructure is essential.

In addition, our 2015 'Striking the Balance' report showed the challenges parents face in balancing work with family commitments. For many becoming a parent limited their career opportunities, the role of the employer in supporting parents is crucial to addressing this issue.

The framework recognises the need to attract and retain talented staff; for working parents the availability of family friendly working policies can help meet this need.

We welcome that early years are mentioned as a key period in providing a solid educational foundation for children.

Suggested indicators –

- Increase the number of family friendly employers.
- Enhance the childcare infrastructure.

Suggested measures –

- Break down the economic inactivity measure to show those who are inactive due to family commitments and the number of economically inactive who want to be in work.
- Number of successful flexible working requests.
- Number of job share arrangements.

Suggested actions –

- Encourage employers to implement family friendly working policies.
- Implement the Childcare Strategy.

Outcome 8: We care for others and help those in need

It is shocking that once again there is no mention of welfare reform under this outcome. The welfare changes that have begun to take place are biggest shake-up of the welfare system since its introduction. It is necessary that people are aware of the changes and how they will impact on their circumstances.

Suggested indicator –

- Benefits uptake.
- Use of advice services.

Suggested measure -

- Number of claimants of specific benefits.
- Impact of welfare reform.
- Number of callers to advice services.

Suggested action -

- Continued awareness rising efforts and targeted advice and information.

Outcome 11: We have high quality public services

This outcome should feature early intervention measures, especially as research shows that investing early saves the public purse in later years (see Heckman, 2012). Early investment in childcare in particular has significant long-term benefits for society. James Heckman's cost-benefit analysis of state provided childcare concluded that there was a 7% to 10% per year return on investment in early years, based on children's increased school and career achievement, and reduced costs in the health and criminal justice systems. In Northern Ireland the childcare infrastructure is failing local families, we call on the Executive to consider universal state provided childcare.

As will our comments on Outcome 1, the role of social clauses in public procurement would ensure that public money is invested wisely, producing additional social benefits.

Suggested measures –

- Measure of number of social clauses included in public procurement (this will involve the collection of additional data).

Suggested Actions –

- Refreshed commitment to include social clauses in all public procurement.
- Introduce legislation similar to the Social Value Act for Northern Ireland.

Outcome 12: We have created a place where people want to live and work, to visit and invest

This outcome raises concerns about jobs and employment opportunities. It states that “a better job is about more than earning potential”. In particular, there should be opportunity for career development and flexibility within job roles. In our 2015 ‘Striking the Balance’ report parents commented that on becoming a working parent career progression becomes more difficult. In addition the lack of flexible jobs was cited as a challenge for working parents. ‘Better jobs’ should include and address these concerns. It is positive that the document mentions caring responsibilities as an area that this outcome must address.

In addition, the infrastructural deficiencies, such as a fit-for-purpose childcare infrastructure, act as a barrier to work. Without a robust childcare infrastructure parents are not supported to work and children do not gain from the developmental benefits.

As previously mentioned ‘enhancing the childcare infrastructure’ should be an indicator under this outcome as well as others.

Outcome 13: We connect people and opportunities through our infrastructure

As above.

Outcome 14: We give our children and young people the best start in life

We fully support this outcome. It is essential that all children and young people are supported to grow and develop to their full potential, unhindered by societal barriers. We welcome the inclusion of the provision of high quality preschool education under this outcome. As previously stated childcare benefits children and families. From a child development perspective good quality childcare has many recognised benefits, in addition early intervention through quality childcare has long term benefits for the child and the public purse. This outcome underpins all the others, it is essential that the associated indicators and actions enable its full achievement.

It should be noted that high quality early years provision is not limited to preschool education. In Northern Ireland all 3-4 year old children are entitled to a free preschool place. This place is 12.5 hours per week for 38 weeks. Although this provision is beneficial for the child, particularly those in disadvantaged areas, there is a need to invest in early years services from birth to primary school.

The private childcare sector currently caters for the large majority of this need, it is essential that good quality childcare provision is available to all children to give the best start in life. The current childcare infrastructure is inflexible, unaffordable and unsuitable to meet the needs of many families; the inability to access childcare due to any of these factors has negative impacts on the child: it is a missed opportunity to enhance child development and can also act as a barrier to parental employment, disadvantaging the family as a whole.

We agree with the attached indicator, “% of children at appropriate stage of development in their immediate preschool year”. We will be interested to see how this data is collected, particularly as it is a new measure, beginning in autumn 2016.

Finally, we note with concern that in this document the indicator to ‘reduce poverty’ has been removed from Outcome 14. We believe that reducing child poverty is crucial to delivering on this outcome and ensuring that all children have the best start in life. We advise once again linking this indicator to Outcome 14.

General concerns

We have two general concerns about the Programme for Government:

1. Accountability

Although we welcome the Outcomes Based Approach, the success of each measure is dependent on 'turning the curve' whether this be a small or a significant change. Our concern is the lack of targets in the framework and associated measures. In some instances targets should not be assigned, however in some areas, such as poverty measures or economic inactivity measures, targets are necessary. At the end of five years a 1% decrease in the poverty rate would be classed as a success by this current framework, yet it is an indication that the framework is not addressing the underlying causes of poverty. There must be accountability and this should be delivered where possible through targets, or, at the very least, an expectation of anticipated pace.

2. Transparency

The Scottish Government uses an Outcomes Based Approach for its Programme for Government. Each of the data sets for the measurements and indicators are publically available and easily accessible through the 'Scotland Preforms' website. Each of the measures are grouped and accessible, we call on our Executive to introduce a similar resource so that every citizen can easily track Programme for Government progress.

3. Childcare

The Programme for Government makes a few references to childcare, including proposals to expand childcare and to provide better access to childcare provision for disabled children, however there is no clear commitment to implement the Childcare Strategy. This should be addressed in the final document.

Summary

We welcome the opportunity to respond to the Executive's Draft Programme for Government and hope that our response is useful in helping to shape the final document. 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.mcmenemy@employersforchildcare.org or telephone 028 9267 8200.

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