

## Submission to the Joint Committee on Children and Youth Affairs

Re: The Affordable Childcare Scheme (ACS)

6<sup>th</sup> February 2017

### Introduction

Barnardos works directly with the children and families who need us most, providing services and support in more than 40 centres around the country. We also campaign for the rights of all children in Ireland, and provide training and knowledge resources to childcare professionals.

Barnardos has long advocated for the introduction of subsidised quality childcare system for all children, and for the roll out of these places to begin with children experiencing disadvantage. Good early years care and education experiences encourage babies and young children to develop and learn. It helps them to share, make friends, and find out new things for themselves.

Quality early years' experiences can also help to protect children from the adverse effects of living in at-risk families or disadvantaged homes so these children can benefit even more. The role of early years care and education in reducing child poverty is far more than the financial contribution parents have to make to the cost. Participation in early years care and education is one of the most effective tools in tackling the negative impacts of poverty on a child's development.

Barnardos' welcomes the publication of the General Scheme of the Affordable Childcare Scheme and commend the Minister for advancing the Scheme. This is definitely a step in the right direction from a child development point of view. Specifically, we commend that there is a universal element to the Scheme and it is based on a foundation that recognises the quality of intervention for the child's own sake and in the child's own best interests.

There are many aspects to the proposals that Barnardos supports so our submission will focus on some areas we believe the scheme can be enhanced. We also provide a list of recommendations we would like the Committee to consider.

### Children must not lose their current care entitlements because of this scheme

Barnardos is particularly concerned about those children particularly at risk of intergenerational cycles of poverty and disadvantage as this scheme will exacerbate these cycles instead of breaking them. There are a number of children whose parents are not in training or employment but who are currently entitled to full time care over a 52 week period under the Community Childcare Subvention scheme. Under the new scheme these children would now only be entitled to 15 hours per week out of term time. This means these children will face a disproportionate reduction in the care they are entitled to receive currently under the provisions of this new scheme. This is in contravention to many of the aims of this scheme. We would suggest, similar to the situation that arises when an applicant qualifies for both a universal subsidy and an income-related subsidy, that the scheme administrator facilitates whichever care arrangement is most favourable to the applicant.

A similar issue arises in relation to community based homework clubs. Currently Pobal allocates funds for children to attend such afterschool programmes in school or community based settings during term time. However, these children would now in most cases only qualify for 15 hours per week out of term time. Again they would be disproportionately disadvantaged by the scheme. Considering these children come from communities where intervention is required, they should be aided rather than penalised if the aim of this scheme is to target those most in need.

We would recommend that any current childcare or afterschool care being provided to the child be considered in the application process, and that no reduction in childcare or afterschool entitlement should occur under the new scheme.

### Relevant 'childcare services' must be regulated and broadened in scope

Approved childcare services under this scheme will be those registered services that have been approved by Tusla. However, it also recognises 'the possibility of other categories of childcare service providers being approved, subject to clear eligibility procedures being established and schedules of such providers being maintained and published'. This is extremely important as it would include childminders. Already work has commenced to ensure their inclusion and this must be prioritised. Given that the

vast majority of children are being cared for by childminders it is crucial childminders offer a quality service, are regulated and vetted and appropriately paid.

#### Application process should be simple, easy to use, and available to all

It is proposed that all applications are entered using the scheme administrator's IT system – people must apply online for the scheme. We would recommend that consideration be made for those parents who may have low levels of computer literacy or who may not have reasonable access to the internet. Also, the scheme has an annual budget cap in place, which means that any subsidy is subject to there being sufficient funds available at the point of application. If someone cannot access the application in a timely manner they risk not receiving any subsidy they may be entitled too. We would suggest that alternative means to apply are developed, to ensure that those most in need do not miss out.

#### Childcare must be **both** accessible to all and of high quality

It is very important that childcare and afterschool is not just accessible to all, but it must also be of a high quality. Poor quality childcare and afterschool care is not in the child's best interests and can in fact be damaging to the child. In order to ensure the highest quality standards, investment is needed. This would ensure continuity of staff, recognition of their qualifications, and would increase the professionalism of the sector. This is in everyone's best interests. There must not be an expectation on providers to respond to increased demand and increased quality requirements without additional support, funding and better pay and conditions for their staff.

Barnardos fully supports incentivising quality care with higher subsidies, available for continuous quality improvement. Incentives should be linked to Siolta accreditation and implementation of Aistear for example. This will require a significant expansion of the quality infrastructure, for example the number and geographical spread of Síolta mentors. Quality should be assessed by the number of staff with a Level 6 qualification or higher, and linked to an expanded Síolta and Aistear accreditation. There should be clear quality measures in all childcare regulations.

Barnardos fully supports compulsory Tusla registration for childcare providers and childminders who are included in the scheme. However, there should be reasonable opportunities to allow greater number of childminders to achieve registration and be subject to inspection.

There should be no public subsidies without minimum conditions attached. Ratios for childminders should be stricter than they are currently and in line with ratios for childcare providers. There should be concerted education and awareness campaign for childminders on the benefit of being part of the scheme.

The scheme must also invest in the professional development of those engaged in afterschool care, as these children have very different needs than pre-school aged children. Barnardos welcomes the inclusion of children in the scheme up to the age of 15 but note there is a dearth of providers offering services appropriate for children aged 8 years and older. And subsequently an absence of recognition of the different skillsets required when working with these older aged children. While subsidies are welcome there needs to be a tandem investment in professional development for this cohort

Investment is needed throughout the sector if we are to ensure quality as well as access.

## Conclusion

Barnardos welcomes the scheme as an important first step in a subsidised quality childcare system with the potential to develop and extend the subsidy available to both parents and providers. The universal element to the scheme is particularly to be welcomed as it recognises the importance of care in the child's best interests. That the scheme targets those most disadvantaged is also to be welcomed.

However, the scheme must also be sensitive to the specific instances in which those who need the scheme most may be at risk of losing their current entitlements. Also the application process must also be simple and accessible to all.

Investment, finally, is crucial if we are to provide high quality services to all.

## Recommendations:

- Reduction in child poverty should be a core aim of the scheme.
- Universal element of scheme should be promoted and developed as it is in the best interests of the child, rather than solely as an advantage to facilitate parents to return to work or training.
- Children must not lose their current care entitlements because of this scheme. Those most in need must not be disproportionately disadvantaged, in contravention of the aims of the new scheme.

- Applicants should get the most favourable childcare arrangements to their circumstances in all instances, in situations where they qualify for both a universal and income-related subsidy, but also in cases where the applicants are currently in receipt of childcare provision for their children.
- There is a necessity to bring childminders within the remit of this scheme in a formal way; to regulate the current procedures relating to childminders; and to enable and facilitate childminders to become approved for the scheme.
- In relation to the application process, consideration should be made to those who may have low levels of computer literacy or who may not have reasonable access to the internet. We would suggest that alternative means to apply are developed, to ensure that those most in need do not miss out.
- Childcare and afterschool care must be both accessible to all and of a high quality. Investment is needed to ensure quality services and enhanced professionalisation of the sector.
- There should be clear quality measures in all childcare and afterschool care regulations and there should be no public subsidies without minimum conditions attached.