

## **The NSPCC response to Conservative Party Childcare Consultation**

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## Introduction

The National Society for the Prevention of Cruelty to Children (NSPCC) is the UK's leading charity specialising in child protection and the prevention of cruelty to children. The NSPCC aims to end cruelty to children by seeking to influence legislation, policy, practice, attitudes and behaviours for the benefit of children and young people. This is achieved through a combination of service provision, lobbying, campaigning and public education.

The NSPCC believes that, given the will, all cruelty can be prevented. In order to achieve this, it is vital that all children, whatever their needs, have a range of services that are flexible and offer them support and protection. The NSPCC has more than 180 services in the UK and the Channel Islands. These services aim to:

- Prevent children being abused by working with parents and carers in vulnerable families to improve their knowledge and skills in safeguarding, and giving children and young people someone to turn to through the provision of our Listening Services.
- Protect vulnerable children and young people from abuse by providing direct services in a number of settings, including schools and young people's centres. We also protect them by providing Listening Services for adults to ensure they have someone to turn to with their concerns; by ensuring that abused children and young people are identified and effective action is taken to protect them, and by working with young people and adults who pose a risk to children and young people to reduce the risk of abuse.
- Help children and young people who have been abused overcome the effects of abuse and achieve their potential.

We set out below a summary of our position on childcare. Where the NSPCC does not respond to specific questions is because we do not consider that we have sufficient expertise in these areas to comment authoritatively. Some of the information included in this response is based on the outcome of a joint research project of the NSPCC, York University and the Frank Buttle Trust, which sought to increase understanding of the complex relationships between poverty, parenting and children's well-being in diverse social circumstances.

### **NSPCC publications on child-friendly working practices**

The NSPCC has urged businesses to adopt a more flexible approach to working parents, through publications such as *Getting it Right – improving work-life balance in your business*<sup>1</sup>, published with the Federation of Small Businesses and the British Chambers of Commerce. The DTI supported this publication through matching financial support. There is much evidence in this publication that flexible working helps both families and businesses. If parents

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<sup>1</sup> NSPCC (2003) *Getting it Right – improving work-life balance in your business*, London, NSPCC

are given the opportunity to spend more time with their children when they are very young and are given more choices about flexible working as their children grow and develop, this reduces the stress of balancing work and home life. We also know that over time the additional costs of such an approach to work are low and that many employers have secured distinct benefits, such as reduced staff turnover, improved recruitment and enhanced staff loyalty.

*Getting it Right: Improving Work-Life balance in your Business* made the following conclusions based on case studies from 11 businesses in the UK. These case studies focus on the business case for introducing work-life balance policies. The businesses reflect diversity in terms of size of work force, ownership, sector and location within the UK. The examples have workforces ranging from seven to 216 employees. Most were privately owned, either as partnerships or companies.

- Only a few of the businesses had a written work-life balance policy and these tended to be the ones with more employees. The others preferred to rely on a flexible and open culture and to respond to individual needs when these arise.
- Each of the businesses had developed their own approach to how to balance the business needs with the needs of individual staff members.
- There were clear business benefits to the employer of having work-life balance policies in place, in particular the ability to retain experienced and valuable members of staff. The benefits were considered to be long lasting.
- In every case the importance of people to the business was cited. Valuing staff and staff loyalty were seen as key to the success of the business.
- Working culture was also seen as very important. Having a policy for work-life balance on its own is not enough. A flexible and open approach is crucial in finding workable solutions for business and employee needs.
- Work-life balance is not an optional extra but an essential part of the business. Once these small and medium-sized enterprises had experienced the benefits of running their companies in this way, they could not really understand why others did not also operate such policies.
- These are all successful businesses. Several have achieved awards in recognition of their success in many different fields.

In 2003 we published *Finding the Balance: young people's views on parental employment*. This argues the case for two developments:

- First, we need research on the impact of parental employment on the lives of older children. There is now a copious body of research which looks at the impact of prenatal employment (particularly mother's employment) on the emotional, educational and social development of babies and young children. There has been no corresponding focus on the impact on older children.
- Secondly, we need to know the views of children and young people about parental employment. In 2003 we launched the Family Friendly

Award, in partnership with Working Families. Groups of young people assisted us in developing an understanding of what makes a good family-friendly employer, and also helped us determine the winner of the Award. This work also illuminates the need for more extensive and rigorous research.

## General comments

The NSPCC has a particular contribution to make to on the debate on childcare and family-friendly employment due to our child-centred perspective on this issue. We are particularly concerned with the impact of parental employment on children's emotional health and well-being. We would like to see a change in the UK's working culture that recognises children's well-being as an important and relevant consideration in the wider debate on employment matters.

We have consistently argued that the best way to develop child-friendly working practices is to give their parents real choices about their working arrangements. This should include better pay for maternity and paternity leave (making it earnings-related), paid parental leave, and an improved right to work flexibly, including opportunities for employment tribunals to independently scrutinise negative decisions on requests to work flexibly.

It is essential that childcare policies are developed to ensure the paramountcy of the best interests of the child and their right to protection.. It is crucial that the guidance focuses first and foremost on the fact that a child has a right to protection from all forms of violence and exploitation, to protect themselves and to expect that people will protect and help them. Article 3 of the United Nations Conventions on the Rights of the Child, which the UK ratified in 1991, states that the best interests of the child must be a primary consideration in all matters affecting them.

Childcare must also have safeguards in place to effectively protect children from harm. Alongside rigorous recruitment and vetting procedures, this requires a culture of safeguarding and vigilance about risks to children. This includes workers having a clear understanding about appropriate interaction with children, challenging unacceptable behaviour of both adults and children, providing examples of good conduct and ensuring that children and young people know where to turn to if they have problems or are being abused.

Staff working in childcare settings must be properly qualified and receive regular training through continuing professional development to ensure they are updated on child protection and safeguarding issues. At least one member of staff must have completed child protection training or a child protection awareness-raising distance learning programme, such as the Educare programme<sup>2</sup>. This person must be the designated staff member responsible for child protection issues. Clear timescales for staff refresher courses and reporting procedures must also be part of a provider's safeguarding policy.

Through both induction and continuing professional development staff should be familiar with the booklet *What to do if you're worried a child is being*

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<sup>2</sup> NSPCC Educare® child protection awareness programmes enable those who have contact with children through their work or leisure activities to gain the confidence to act upon concerns about children and play a role in preventing abuse.

*abused*<sup>3</sup> which offers sensible and accurate information and can be accessed quickly. It sets out the level of understanding required by anyone whose work brings them into contact with children and families and who contributes to promoting children's welfare and safeguarding them from harm.

### Children's Centres and Sure Start

- **Will Children's Centres succeed in providing access to childminder networks, health, family services and employment support?**
- **What should be the future of the Children's Centres programme and free part-time provision?**
- **Are Children's Centres set to provide high quality extended care outside school hours, and how can better provision be offered outside the school term, and help be provided for older children and children with disabilities?**

We do not have sufficient expertise in these areas to comment authoritatively.

### Financial support for families

- **Where do the main problems lie with the present system? How should the system respond to the link between lone parent poverty and worklessness?**

The potential gains from work income should not be undermined by the loss of housing benefit and council tax benefit. These are both important contributors to parents deciding that working is not worth it. We would like to see a gradual reduction of these benefits in line with income and greater flexibility built into the benefits system to allow for short-term changes in circumstances.

Specific changes to the benefit and tax credit systems, including eligibility for passported benefits (such as free school meals) and social fund grants should remain open to those in work but whose income remains under a predetermined threshold.

Eligibility for the social fund should be extended to those out of work who receive benefits other than income support (e.g. Incapacity Benefit, Disability Living Allowance and Carer's Allowance, and contribution-based Jobseeker's Allowance).

In addition, access to advice on benefits and tax credits needs to be improved with consideration given to making it available in locations parents already go to, such as GP surgeries, or via practitioners they already see, such as health visitors. Initiatives of this kind are beginning and should be extended. Application forms also need to be simplified.

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<sup>3</sup> HM Government (2003) *What to do if you're worried a child is being abused* HM Government

Access to help with budgeting and managing debt needs to be increased, including free legal advice. A limit to the interest that can legally be charged for loans should be introduced to reduce debt and its escalation.<sup>4</sup>

- **What should be the next steps for maternity and paternity support?**

We recommend that additional statutory paternity pay should be payable at an earnings-related weekly rate rather than at a fixed weekly rate.

If the additional statutory paternity pay was set at a fixed weekly rate of approximately £106 a week there would be very little take up, as the current gross average full time weekly wage for men is £505.

Statutory paternity pay should be payable at an earnings-related weekly rate, and not below the minimum wage. Both parents need to be supported in balancing their work and family commitments and it is important that take up is closely monitored.

#### The childcare workforce and quality

- **To what degree is quality of provision linked to qualified childcare workers?**

People who work with children in childcare settings need a range of skills: to keep children safe and healthy; to provide stimulating activities matched to the children's needs and capacities; to maintain good relationships with parents; and for some the ability to run their own business successfully. Training and support, both for those intending to work with children and for those already doing so, helps to ensure the necessary competences, and achieving qualifications gives individuals recognition for their skills and knowledge and demonstrates to employers and parents their competence to look after children.

Quality of provision in childcare is very important. Parents who prefer to look after their own children for most of the time, and relatives and other informal carers, want the children to have access to a good range of additional development opportunities, for example in playgroups, or out of school study arrangements. In addition, those parents who need or want to work or to train will leave their children only if they are satisfied that they will be well cared for by others. Deciding who should look after their children is a major and very personal decision for parents. They are likely to look first for someone who is kind and trustworthy, but they also want to be reassured that the carer is competent

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<sup>4</sup> Hooper, C. A., Gorin, S., Cabral, C., Dyson, C., *Living with hardship 24/7: diverse experiences of families in, diversity and 21<sup>st</sup> century poverty [working title]*. (Publication expected April 2007). The Frank Buttle Trust; University of York Department of Social Policy & Social Work; NSPCC Research Department.

There is also clear evidence that good quality day care in the earliest years has long-term benefits for children's social and intellectual development<sup>5</sup>. Children and their parents benefit from the stimulus of new environments, social contacts and different educational opportunities. For children from disadvantaged backgrounds, the benefits are particularly strong. For school-age children, facilities must offer support for learning – for example, quiet places for homework. And for older children, supervised activities must also be more attractive.

- **Should government aim to ensure that a higher number and percentage of staff workers are qualified and, if so, what should that number and percentage be, and over what period of time?**

Yes. Government must ensure that a comprehensive and flexible framework of training and qualifications is put in place. This must be recognised by employers and would enable workers in the sector to add to their skills, progress in their careers or to work with children of different ages, and to move freely from one employer to another.

- **What could be done to open up the childcare workforce to more men, and to older, ethnic minority and disabled workers?**

Greater value and importance must be attached to the childcare workforce. The job title of 'nursery' or 'childcare' 'worker' often conjures an image of a well-meaning amateur who has learned many of the skills on the job. The work is undervalued, underpaid and underfunded and its low status has made it an unattractive proposition for graduates looking to forge a career in child development.

The childcare workforce needs to be 'professionalised' with training covering behavioural sciences, working with conflict, promoting teamwork and subjects aimed at building self-esteem. It is essential that better financial rewards and pay structures are put in place and that ongoing professional development and training is an integral part of childcare roles.

#### Informal care and information

- **Should government seek to support informal care as well as formal care and if so, how? Should the childcare tax credit be made available to informal carers as well as formal carers?**

Childcare from friends and family should be eligible for subsidy under the tax credit scheme to allow parents to make use of childcare that may be more available and acceptable to them than formal arrangements. While family

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<sup>5</sup> Sylva, K., Melhuish, E. C., Sammons, P., Siraj-Blatchford, I. and Taggart, B.(2004),The Effective Provision of Pre-School Education (EPPE) Project: *Technical Paper 12 - The Final Report: Effective Pre-School Education*. London: DfES / Institute of Education, University of London.

members can become registered childminders at present, if they provide care for at least one other child, there are costs for registration, and some may prefer not to submit family relationships to formal regulation.<sup>6</sup>

- **What in particular could be done to make more information available to the parents of disabled children, ethnic minority children and children with special needs?**

It is essential that information about childcare is available to parents of disabled children, ethnic minority children and children with special needs. It should also be available in different formats, for example for parents who are themselves disabled. Information should be specifically designed and targeted towards these groups to clarify the safeguards needed to protect their child in childcare settings.

This information could be made available as part of postnatal care, by local authorities or by employers when parents return to work. In addition, information should be disseminated through black and ethnic minority media and community groups which parents of black and ethnic minority children may be involved with.

#### The role of Government

- **What should the role of government be in relation to childcare?**

Children in childcare settings can be particularly vulnerable and it is essential that the government puts in place safeguards and a rigorous system of protection which assures standards in terms of the vetting and fitness of carers, their qualifications, adult to child ratios and the physical environment in which care takes place.

The government should also set standards for providers and determine what role there should be for accreditation schemes or other means of assuring quality promoted by voluntary bodies and how informal carers might be offered advice on how to improve standards of childcare.

The Northern Ireland Department for Health, Social Services and Public Safety is currently carrying out a consultation on an accreditation scheme for unregulated childcare providers. We recommend that the findings of this consultation are reviewed when they are published to see how they could be used to inform an accreditation scheme in the UK as a whole.

- **Is the present allocation of responsibilities for childcare within Government right and, if not, how should it be reformed?**

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<sup>6</sup> Hooper, C. A., Gorin, S., Cabral, C., Dyson, C., *Living with hardship 24/7: diverse experiences of families in, diversity and 21<sup>st</sup> century poverty [working title]*. (Publication expected April 2007). The Frank Buttle Trust; University of York Department of Social Policy & Social Work; NSPCC Research Department.

We recommend that responsibility for maternity and paternity pay and flexible working is held by one Minister in the Department for Work and Pensions. At the moment responsibility for these two linked issues are split and held by two separate Ministers within the Department.

We also recommend that the Work and Pensions Minister who has responsibility for these two issues works closely with the Minister for Children, Young People and Family who currently resides in the Department for Education and Skills. It is important the two Ministers work together well to ensure seamless policy for childcare, the delivery of flexible working rights and high quality and standards in the provision of childcare.

- **Should Parliament improve its scrutiny of Government childcare policy and, if so, how?**

In line with closer working arrangements between the Department for Work and Pensions and the Department for Education and Skills, we recommend an annual joint evidence session between the Select Committee for Work and Pensions and the Select Committee for Education and Skills. The session would bring together members of these two influential committees to scrutinise childcare policy as a whole and the Ministers in each Department responsible for flexible working and maternity/paternity pay and standards in childcare collectively.

#### The future of childcare and education

- **How could childcare play an even greater role in the emotional and physical development of children in their early years and beyond?**
- **What further support do childcare providers require to help children's readiness for school, and prepare them for the many new pressures children face as part of their childhood?**

Childcare plays a key role in the emotional development of children. Caring for a child is first and foremost about their mental health and emotional well-being. A strong attachment figure to provide containment for the infant's projections of anxiety and their overwhelming emotions is vital to the development of their personality and emotional well-being. An infant who has internalised a strong attachment figure is then able to separate from that attachment figure and make relationships with other important adults in their lives. This is particularly important in preparing children for school.

- **The life chances of disabled children, children with special needs, and black and ethnic minority children are still lower than those of others. What should be done to raise them in relation to childcare provision?**

Childcare plays an important role in increasing the life chances of disabled children, children with special needs, and black and ethnic minority children. It is particularly important that assessments for learning disabilities and

attachment disorders are undertaken at an early stage and that targeted support and forms of learning are put in place.

The access and support needs of disabled children and/or those with special educational needs, and black and minority ethnic children, should be a particular focus for such support. Childcare staff should thus be trained to work with children with a range of a specific needs and access requirements.

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