



## **Child Poverty Strategy and Delivery Plan – Consultation**

### **Response of the National Childminding Association Cymru / Cymdeithas Genedlaethol Gwarchod Plant Cymru**

#### **NCMA Cymru General Information**

The National Childminding Association (NCMA) is the only national charity and membership organisation that represents home-based childcare in Wales and England, delivered by registered childminders and nannies. NCMA has approximately 43,000 members.

We promote quality home-based childcare so that children, families and communities can benefit from the best in childcare and education. Working in partnership with Welsh Assembly Government, CSSIW, local authorities, Integrated Children's Centres, community-focused schools and other childcare organisations, NCMA Cymru aims to ensure that every registered childminder has access to services, training, information and support to enable them to provide a professional service. NCMA offers to work with all local authorities across Wales and England. We also aim to ensure that everyone who supports registered childminding has access to the information, training and support they need.

#### **Consultation Questions**

1. What are your views on our three strategic objectives for our new child poverty strategy for Wales?
2. What are your views on the policy action we set out in the delivery plan?
3. Do you think the policy action set out in the Delivery Plan will enable us to achieve our three strategic objectives and our vision for 2020?
4. What is the best way to integrate local multi agency support for families living in poverty?
5. Any Further comments.

## Response

### 1. What are your views on our three strategic objectives for our new child poverty strategy for Wales?

- NCMA Cymru broadly supports the **objectives** contained within the strategy. Reducing the number of families living in workless households is important in freeing children and their families from poverty and paid employment is recognised as the most sustainable route to achieving this. Ensuring that families are able to access training is also an important element, as this will increase the chances of finding employment in the future.
- NCMA Cymru support the objective to improve the **skill levels of parents**, improving the chances of securing well paid employment. However, given the current economic climate and with high unemployment levels in Wales suggesting that job losses remain a reality, it will not necessarily follow that improving the skills of parents will lead to well paid employment, which is how it reads in the document. Improving the skills of parents should be encouraged and supported, and the Assembly Government is to be commended for initiatives focusing on economic regeneration and workforce development. However, an assumption that ‘well paid employment’ (definition required) will follow improvements in skill levels would be misleading. Other factors, such as the continued creation of such jobs, will also be important.
- The third objective - ‘Reducing inequalities that exist’ – is clearly necessary but it is the detailed action, involving cross sector support and investment, that will be key to achieving this.
- Given the reduction in public spending and the fact that the Welsh Assembly Government will have a reduced budget this year and in the coming years, it is reasonable to express concern that an ambitious strategy such as this one could suffer from reduced resources and it is important that spending reductions do not threaten ongoing work that is currently delivering positive outcomes for children and families in Wales.
- It is important to note however that it is not only financial resources that will address child poverty. It is vital that broader support is provided in the right ways, so that the life chances of all children are improved. Children should have access to experiences and opportunities that can enrich their lives, regardless of background and finances.
- Registered childminders have an important role to play for families seeking to develop their skills or gain employment, thus helping them emerge from poverty. Childminders are able to provide the flexible, quality, consistent care that parents require for their children in order that they themselves feel comfortable in seeking employment or training.
- Childminders are community enterprises in their own right and their role in meeting the objectives of the strategy should be recognised, not only for their role in supporting families back into work, but for improving outcomes for disadvantaged families.
- As the strategy mentions, employment does not always provide a route out of relative poverty and therefore action on ‘in work poverty’ is to be welcomed. Action to improve job quality is important to ensure that employment provides enough financial reward to ensure families are not living in income poverty.

- Due to the flexible nature of the care they provide, childminders are able to support those parents who work atypical or irregular hours and the provision of this wraparound care is important in ensuring that parents are able to undertake such employment whilst having access to childcare.
- Whilst sustained employment is recognised as the most effective route out of poverty it should also be noted however that for some families, it may be of benefit for parents to care for their children full time as opposed to accessing formal childcare arrangements. Similarly, families who want to care for children full time may want to explore childminding as a career.
- NCMA Cymru welcomes the objective to tackle inequalities that exist for children living in poverty. This will require genuine cross departmental working and must coordinate objectives between areas such as health, education, housing and the economy. It is possible however that measuring such an objective may prove problematic and it will be vital that the evaluation framework contains robust measurements relating to these inequalities that currently exist and how progress against these will be measured.

## **2. What are your views on the policy action we set out in the delivery plan?**

The delivery plan covers a wide range of policies and policy actions covering key portfolio areas which have an impact on child poverty. NCMA Cymru welcomes the fact that the delivery plan encompasses such a broad range of policy areas and lays out policy actions within each that it intends will lead to progress on child poverty.

The policy action relating to childcare is vague and it would be useful to see more detail regarding what exactly the Government intends to do to close the gap between demand and supply for childcare and to provide integrated solutions to improve supply and diversity of this care. NCMA Cymru will support the Government and partners to achieve this objective but it is the detail which will be important.

The delivery plan, along with the strategy, is though by definition a collection of commitments and statements and it is how this is carried forward 'on the ground' that will be important. Ensuring 'buy-in' from all Government departments and sectors will be vital in order to continue the mainstreaming of child poverty into policy. The creation of the post of Deputy Minister for Children is welcome and the Government should be commended for this.

The delivery plan does outline many existing initiatives and whilst many of these will have an impact on child poverty rates, recent stalled progress in this area suggests that not all of these are as effective as they might be hence a clear distinction between existing policies and new policies in the document would be useful. This would provide an opportunity to evaluate new policies to see whether they are making a difference. Consistent evaluation of existing policies is obviously also important, especially in these austere times where it is even more vital the Welsh pound is delivering maximum value for the people of Wales.

## Chapter 2 – Income poverty

- NCMA Cymru welcomes the listing of specific **policy actions** in the delivery plan. This allows readers to see clearly all the policies and initiatives currently in place in Wales that are intended to have an impact on tackling child poverty and should highlight to all those working in related fields that their work is fundamental to reducing child poverty.
- However, it could be useful if a distinction was made in the delivery plan between **existing** actions which are to be continued and **new** policy actions that are to be implemented.
- Greater detail would also be welcome in some areas regarding exactly how objectives are to be met – this could include roles and responsibilities relating to aspects of policy. This would clearly indicate which organisations will be/are expected to undertake which aspect of the work and could also avoid overlap. Whilst current funding uncertainties make the situation difficult, especially for local authorities and the voluntary sector, it is still important that a strategy and delivery plan contains detail in addition to strategic objectives.
- Policy actions aimed at **Economic Renewal and Strategic Regeneration** are to be welcomed, especially in areas of high deprivation, to help boost local employment whilst also improving local communities and the quality of life. NCMA Cymru would suggest that childminders have a role to play in such economic renewal, as they are providing childcare which allows parents to access employment and contribute to the local economy. Successful childminder businesses also represent private enterprise with social objectives, which can be a key driver in local economic regeneration.
- Initiatives regarding debt and financial advice, fuel poverty and improving housing are all vital in helping to ensure children and families remain free from poverty.

## Childcare

- NCMA Cymru supports a strategic and coherent approach to childcare policy in Wales. Childminders play a vital role in the provision of integrated and diverse childcare options for families in all parts of Wales. NCMA Cymru works with the Welsh Assembly Government, CSSIW, local authorities Integrated Children's Centres, Community Focused Schools and other childcare organisations to ensure that childminders have access to services, training and support and parents and families have access to information about childminding as part of a vibrant childcare sector.
- The delivery plan is fairly weak and vague on childcare action which is disappointing given the importance of childcare to many aspects of family and community life. NCMA Cymru would like to have seen greater detail contained in the Childcare section of the delivery plan, reflecting the contribution of the childcare sector in Wales and the significant proportion of families who interact with it on a daily basis. The latest official CSSIW figures from 2009 stated that there were 4,447 daycare settings in Wales providing

73,645 places for children. Childminders account for 2,427 of these registered settings – 54% - and it is clear that a large number of families rely on such care, which in turn allows parents to access employment. Whilst there are obviously many other factors contributing to parents taking up work, it is clear that childcare is a significant one and the Child Poverty strategy ought to reflect this fact more specifically.

- NCMA Cymru supports the aim to close the gap between demand and supply for childcare in Wales and works with local authorities on the production of Childcare Sufficiency Assessments, in order to identify gaps in provision and undertake work to fill those gaps and meet the needs of children and families. NCMA Cymru would however like to see further information about what additional action will be undertaken to close the gap between demand and supply of childcare in Wales and what precisely this will involve for childminders, other childcare providers, local authorities and other organisations along with any additional resources that will be allocated to support this.
- The ability of childminders to provide care for their community is also affected by the actions of other agencies and in some cases in Wales the work of childminders is being hindered by such actions. One example of this is local interpretation of planning guidance which is hindering childminders who are seeking to increase the numbers of children they care for. Planning authorities are in some cases also limiting the number of children that childminders can care for without planning permission, to incorrect amounts. NCMA Cymru and childminders are supportive of the need for planning authorities to take into consideration the needs of the local community when assessing a childminding business. However, NCMA Cymru has evidence that this is being taken too far and that limits are being placed on childminders when there is little or no change to the conditions in the local community eg. traffic flow. Such limits are threatening childminder businesses and the sustainability of childcare in local areas. Childminders work with neighbours to ensure their business has minimal impact on the local environment.
- NCMA Cymru believes there is further need for collaboration and joint working to ensure that childminders, local authorities, planning authorities and others recognise the importance of childminders in Welsh communities. It is also vital that childminders receive the support they require when setting up their business.
- The delivery plan refers to ‘high quality’ childcare and it would be useful for this to be defined as this could potentially refer to the qualifications and experiences of staff, resources available to childcare staff, changes to the inspection regime or the grading of childcare setting which occurs in England.
- NCMA Cymru is currently working on a new Quality Assurance scheme for childminders in Wales, focusing on clear outcomes for children and improving quality across the childminder sector. The new quality assurance scheme will be developed in line with the seven core aims relating to the United Nations

Convention on the Rights of the Child and the aim is to extend the scheme to greater numbers of childminders to ensure further development and improvement across the sector. NCMA Cymru is currently working with childminders, local authorities and key stakeholders to develop and pilot this scheme.

- It is important that further publicity work is undertaken by Welsh Assembly Government and UK Government to publicize assistance that is available to parents to help with childcare costs eg. Child Tax Credits. It is important that take up of such assistance is maximized for those who need it. The Family Information Service and its role must also be supported and highlighted and ongoing work in this area is to be welcomed. The Strategy and Delivery Plan must reflect the important role of the Family Information Service in this and many other areas as an information point.

### Chapter 3 – Children have a Flying Start

- Policy action that will develop a more coherent approach to family support is to be welcomed. Holistic models that integrate interventions with families are vital in ensuring each family receives the most effective support and also in making sure that resources are being used effectively. It is important that families who require the most help are receiving tailored support. Childminders are providing such support in a variety of ways, for example by providing care for children in families undergoing severe stress, which in turn allows parents to carry out other activities eg. shopping, accessing support. Such work is helping to develop clear pathways for parents, enabling them to access the help they may need to become self sufficient as families. It is important that the support childminders receive, enabling them to develop and progress their skills, is maintained and the allocation of resources and support to this will be vital.
- Flying Start – Childminders should be key partners within Flying Start and NCMA Cymru works within local areas to ensure childminders are fully integrated and equal partners. This is vital in order that parents have access to a full choice of childcare options and children can receive the benefits of the care childminders provide, should it suit the particular child. It is important that childminders are seen as equal partners and that they are utilised and supported through the Flying Start programme.
- NCMA Cymru see ICCs as key partners, with several NCMA Cymru staff based locally within ICCs. This puts NCMA Cymru in a good position to work with ICC staff and develop and promote ICCs to parents and local partners within the community.

#### Chapter 4 – Children have access to education, training and learning

- NCMA Cymru employs a Foundation Phase Development Officer who, as part of the role, supports childminding settings across Wales who are funded early years education providers. NCMA Cymru would like to see more consistency across Wales in the choice for parents to choose a registered, quality assured childminder as a provider for their child/children's early entitlement or nursery education. Currently there are huge discrepancies between Local Education Authorities (LEAs) with some pro-actively working with childminders as funded providers while other LEA's will not allow parents to choose a childminder as an alternative to other maintained or non-maintained provision.
- In some areas of Wales quality assured registered childminders are able to provide care to vulnerable children and those who are eligible for Flying Start provision but then not able to continue this by becoming educational providers. This is something NCMA Cymru feel could be of significant benefit to the children concerned through continuity of care and education, partnership with parents and families from more deprived areas and workforce development of childminders across Wales.

#### Chapter 5 – Children enjoy best possible physical, mental, social and emotional health

- NCMA Cymru supports efforts to reduce health inequality in Wales. Improving the health outcomes of children and parents in low income families, along with the whole population, is vital if child poverty is to be tackled effectively.
- Childminders are playing an important part in promoting positive health messages, through the care they provide and the interaction they have with children and families. Childminders are involved in Early Years Health schemes and in many areas are working towards further qualifications in this field eg. working towards Healthy Snack standards. Wider health policies, such as sun safety, are also covered in the work of many childminders.
- As part of the National Minimum Standards for Childminders, children must receive food that is wholesome and nutritious, and childminders promote healthy eating messages by providing healthy snacks eg. Fruit, for the children in their care.
- Childminders integrate dental health into their daily routine with children, as part of the National Minimum Standards, helping children with teeth cleaning and promoting messages about dental health.
- Physical activity offers many benefits for children and adults. As part of the minimum standards, childminders are expected to help children with their physical development, providing play activities that develop their skills. Childminders visit local amenities such as parks and leisure centres, ensuring

children experience physical play, helping to combat obesity and other associated health issues.

#### Chapter 6 – Access to play, leisure, cultural and sporting activities

- Play and activities are at the centre of the care provided by childminders, and this is part of the National Minimum Standards. Childminders must provide a range of activities, designed to develop the physical skills of children in their care, and provide experiences to help foster the child's curiosity to learn and experience the world around them. The use of Welsh in childminder settings is a key way childminders are achieving this, with a recent NCMA survey of members in Wales finding that almost 50% of members speak some Welsh with 92% of these using Welsh in their setting, thus providing children with cultural and linguistic knowledge.

#### Chapter 7 – Children are listened to and treated with respect

- Childminders follow strict guidance to ensure children are treated in an appropriate and respectful manner, both physically and emotionally. Policies regarding behaviour are produced and parents have access to this and have discussions with childminders regarding the type of care children are receiving.

#### Chapter 8 – Children have access to a safe home and community which supports physical and emotional wellbeing

- NCMA Cymru believes that children should always be cared for in a safe and secure environment and be able to engage with cohesive communities and therefore we welcome commitments working towards this goal.
- The minimum standards for childminders stipulate that children must be cared for in safe, secure premises which are in a suitable state of cleanliness and decoration. Building and planning requirements have to be met and the premises must be free from hazards and be suitably spacious and contain room for play, rest, washing and toilet facilities. Childminders also follow stipulations regarding temperature and ventilation of the premises.
- Current programmes aimed at improving affordable housing are to be welcomed. Much of the housing stock in Wales is in poor condition and this can impact on many aspects of a child's life. It is vital that current investment in affordable housing and communities is maintained, to combat homelessness and to ensure families are able to live in safe, secure, quality housing which in turn may improve family prospects in terms of employment, combating poverty, health and general well-being.
- It is important that childminders are able to establish new businesses in both private and publicly owned housing, provided all stipulations are met to ensure premises are suitable. In many areas of Wales, poverty is often concentrated in affordable (social) housing and the provision of childcare in these areas, through childminders and other settings can help remove

barriers to people seeking employment. Childminders need to be able to meet local demand, in all tenures of housing including private and social/affordable housing. As key community organisations, landlords will acknowledge not only the housing needs of people, but their broader community needs. Childcare is one of those needs and NCMA Cymru will work positively with landlords and childminders to support the development of childminder businesses in all areas.

- Regular inspections by CSSIW ensure that childminders are following all standards and children are being cared for in an environment that is suitable. Prior to registration the premises will also be inspected regarding its suitability.
- As locally-based enterprises, embedded within the community, childminders are well placed to help the children they care for gain experiences and interactions with their local environment. This can involve visits to the park or local shops/libraries, where children experience new aspects of life.

#### Chapter 9 – Vulnerable families and children

- Vulnerable children and families must receive support, care and education that is tailored to the individual child and family. Families should be able to access a wide range of provision and work with the authorities to ensure they are able to access the service that best suits their particular needs.
- The fact that children from certain **ethnic minority groups** are more likely to be living in poverty, as stated in the delivery plan, needs to be addressed. It is likely that a lack of childcare provision for ethnic minority groups has compounded this problem, as parents in ethnic minority groups have been unable to find appropriate childcare for their children, thus preventing them from working. NCMA Cymru have been working towards addressing some of these issues by implementing a BME childminding recruitment project. The aim of this project is to recruit childminders from ethnic minority groups and provide training and support in order to provide childcare within these communities. The Assembly Government's Refugee Inclusion Strategy states that the main reason for women not being able to attend training courses is the lack of access to childcare so it is clear further work in this area is required.
- Childminders in Wales are working with families seeking asylum in Wales, providing care to children and much needed support for these families. Experience from NCMA Cymru staff is that childminders have been helpful to such families who can feel isolated within the system. The flexible support a childminder can provide has proved helpful to these families, especially as parents often have to attend meetings and appointments regarding their status and the childminder has therefore been able to look after the child. There are several examples in Wales where childminders have worked with families seeking asylum for a number of years, in which time they have moved from asylum seeker status to being granted asylum.

- NCMA Cymru welcomes policy action designed to solve some of the issues facing **disabled children** and their families. It is evident that families with disabled children face an increased risk of poverty in Wales – a fact supported by research conducted by NCMA in March 2009. This research, entitled '*Childcare for Disabled Children and Young People*' found that disabled children and their families, through no fault of their own, disproportionately experience inequality and poverty. The often higher costs of childcare for disabled children and the different requirements and needs of each family, often mean that such families are left behind in policymaking and fail to receive the support they require, such as respite care.
- It is pleasing that the delivery plan supports grant funding in relation to the care of disabled children, support for families to receive respite care and short breaks. Childminders are often able to work with disabled children and their families and offer numerous benefits to them such as flexibility – child minders can provide short periods of care to provide respite for parents, or longer, more sustained care. Childminders are also able to offer specialist support to ensure the specific needs of the child are being met.
- It is important that the Assembly Government recognises the higher costs that can be associated with such specialist care however and that childminders receive the support necessary to ensure they are able to provide this care without threatening the viability of their service, given the higher costs for the childminder for example in providing one-to-one specialist care. Such support is vital as it can help remove a barrier to parents of disabled children who want to work but do not feel they can as there is a lack of specialist childcare available to them. Developing the capacity of the childcare sector to provide this support will require continued investment and support and can create major benefits for children and their families, especially in emerging from or avoiding poverty. It is important however that parents have access to this information so their childcare options are not reduced.

#### Chapter 10 – Working in partnership and local delivery

- NCMA Cymru works in partnership with local authorities, CSSIW, Assembly Government, children's organisations and other partners in the delivery of services for childminders across Wales and the provision of support and information regarding childminding. NCMA Cymru supports the view contained in the delivery plan, that progress on child poverty reduction goals depends on delivery through strong partnerships at all levels and NCMA Cymru will continue to support such action at all levels. It should be noted however that organisations sometimes have different ways of operating and may have differing attitudes towards multi-agency work so this aspect may require further definition, work and leadership to see consistent multi-agency

working realised across Wales, and with it, the principles embedded in the Beecham Review<sup>1</sup>.

- There are good examples of local, multi-agency working in Wales and NCMA Cymru works with local authorities and other key stakeholders, for example on Children and Young People's Plans and as part of the Early Years Development and Childcare Partnerships (EYDCP). NCMA Cymru on the whole enjoys largely positive relationships with local authorities on childcare issues and policies and aims to work with authorities to ensure childcare provision is mixed and meets the needs of families. NCMA Cymru staff are involved in key strategic planning groups, such as Core Aim 1: Flying Start in Life, delivering key services aimed at improving the life chances of children.
- NCMA Cymru staff work actively with local authorities and other local agencies on key areas such as the Childcare Sufficiency assessments. NCMA Cymru is a key partner in the production of the relevant action plans resulting from these assessments, which are vital in ensuring that shortages are addressed and outcomes are improved in all areas of childcare, not only childminding . NCMA Cymru also works with local partners on consultations, local policy planning and the delivery of childminder training. For example, working in collaboration with local authorities has led to the development of training sessions for potential childminders (Pre-ICP courses) which have helped identify those prospective childminders best able to demonstrate their ability and commitment to proceed to registration.
- NCMA Cymru staff work with other childcare organisations and value such partnership working designed to coordinate resources and support team goals and targets within an area.
- However, there are areas where multi agency working could be improved and it is important that local authorities, NCMA Cymru and other partners are engaged and maintain dialogue, so as to ensure quality childcare provision in all areas of Wales and to ensure childminding is an available form of childcare for parents. NCMA Cymru believes it must be seen as a key partner, with representation on these key strategic groups to ensure that all of the views within the childcare sector are heard. It is vital that all local partners are aware of what childminders can offer in terms of flexible, quality childcare and NCMA Cymru will continue to make the case for home-based childcare, with particular regard for its role in tackling child poverty.
- It is vital to note that partnership working involves a notion of equality, at least in relation to decision-making. However the third sector does not always have an equal position at the table when decisions are made, which could disadvantage the communities they represent and the work being done by third sector organisations.

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<sup>1</sup> Beyond Boundaries: Citizen-Centred Local Services for Wales. 2006

- There can be unacceptable inequalities in terms of power and control and this can hinder delivery and partnership working. Partnerships will not work if there are significant differences between partners in terms of their voice or power within the partnership and their ability to shape events. This is particularly the case where funding is controlled by one member of a partnership, which leads to inequality and a possible lack of honesty as the power relationship between funders and grantees is unequal.
- Working in partnership can also be costly in terms of stakeholders' time. It can involve frequent meetings to discuss the project and progress, which requires planning and support. This needs to be recognised by a partnership and allowances made to allow full accessibility around the table.
- It is clear that the reasons for a family being in poverty can vary greatly and as a result programmes of support must be tailored towards the particular needs of the individual family. The provision of accessible childcare can be one important element of support for a family and childminders should be seen as a valued and viable option as part of local childcare sectors. It is the job of NCMA Cymru, local authorities, Family Information Services, Social Services and others to work together to ensure parents have access to information regarding childminders, in order that they can access the childcare option that is most suitable for their family.
- It is right that local delivery of services tackling poverty should be family focused, bespoke, integrated, pro-active, intensive and local, as stated in the delivery plan. Childminders are able to deliver their services in a way that meets such objectives: through working with the family and building up a relationship, providing care which is tailored to the family's individual needs, working with other organisations such as Social Services on care placements and working in local communities, reflecting different circumstances eg. urban and rural.
- NCMA Cymru supports in principle the development of proposals to make much greater use of joint inspection by CSSIW and Estyn. Effective inspection is a vital part of quality improvement and development and joint working could help create more effective inspection. It will be important that any such regime would not lead to a disproportionate level of inspection and therefore detailed guidance and work will be needed to support joint inspection regimes.
- Budgets – NCMA Cymru agrees that it is important to explore creative ways to deliver more for the Welsh pound, given the current economic climate and the reductions in public funding currently being implemented. NCMA Cymru is clear that investment in childminding has a multiplier effect, thus maximizing the value of initial investments. Investment in childminding can offer numerous benefits: for the **child**, who receives quality care, highly beneficial to their early development; supports the **family**, as parents access employment or further support if they are facing particular issues. This can also make a vital contribution to keeping the family out of poverty/emerging from poverty; supporting the **local economy**, as childminders develop into

vibrant local enterprises, making an economic contribution, embedded in the area and providing a vital service for others.

- **Joining up action across WAG** – It is encouraging that the Assembly Government recognises that there is a need to ensure joined up action across Government departments. It is vital that different aspects of WAG policy compliment and are coordinated to ensure progress can be achieved towards reducing child poverty. NCMA Cymru is encouraged by the Cabinet Committee on Children and Young People and the Child Poverty Delivery Group. This high level work, in areas of shared responsibility must filter down to all officials and across work with external agencies to ensure that all those involved are aware of ongoing work in other departments/areas of interest that will compliment common goals.

For example, officials working on Assembly Government economic policy and those working on childcare will hopefully be able to share ideas to inform policy formulation, reflecting the fact that childcare is vital to ensuring people are able to gain employment and sustain this, and thus make an economic contribution for themselves and the wider economy. NCMA Cymru acknowledges its own role in ensuring it is communicating such messages to Government officials and will continue to work towards such objectives.

#### Chapter 11 – The role of place

- **Rural Areas** – It is important that policies aimed at tackling child poverty recognise the issues faced in rural parts of Wales and take account of the problems faced by many in rural Wales in accessing services. This is not to say that urban areas do not contain such problems – as the delivery plan states, problems such as a lack of childcare, poor housing, unemployment can affect both urban and rural areas. However it must be recognised that in rural areas, such issues can be more acute given that costs in providing services in rural areas can be higher and more difficult for a variety of reasons, such as poor transport links.
- NCMA Cymru sees the provision of childcare in rural areas as a key element in contributing to the creation of sustainable communities. It is vital that rural areas have access to local services and amenities such as shops, leisure facilities, schools and housing to enable people to live in those areas and ensure they remain vibrant and sustainable. Childcare is a key aspect in helping to ensure that families are able to live in an area, without having to travel great distances to access such care, which may lead to them simply migrating out of the area to more urban areas where childcare provision may be more accessible. The cultural future of rural areas is also reliant in some cases on people being able to stay within a community, and a lack of services can force people out and thus prove detrimental to the cultural, linguistic and social sustainability of the area. Work in recent years by the Joseph Rowntree Foundation in Wales has raised such issues and it is pleasing that such messages are being considered in Government policy-formulation.

- It is important that in areas where a known demand has been identified by the Childcare Sufficiency Assessment, childminders are supported in setting up their business and that local policy compliments such initiatives, which will be for the benefit of the whole community.
- NCMA Cymru have submitted a bid for funding through the New Ideas Fund to support a research project examining childcare in rural areas.
- Childminders are well placed to work alongside existing initiatives and strategies aimed at reaching families in areas with high concentrations of deprivation. The support offered by childminders, with a greater degree of one-to-one engagement, can be particularly beneficial to young parents, single parents or parents of disabled children and supporting their role as parents.

#### Chapter 12 – Monitoring outcomes for children and young people living in poverty

- It is important that progress against child poverty can be measured, in order that Government and organisations are able to assess what they are doing and any improvements that are required.
- It is important that all child poverty indicators are genuinely child focused. Currently, the relevant child poverty indicator in Chapter 3 refers only to the number of childcare places available. An indicator in this area could be more effective if it covered factors such as the need for childcare, the type of childcare required and the flexibility of care required. This would help reflect better the needs of local people and help policymakers assess the impact of childcare provision within an area in a more holistic manner.
- At a local level, childminders have a duty to plan for and meet the needs of each individual child in their care and this includes ongoing monitoring of a child's development and progress in a range of areas. Childminders will engage with parents about their child's particular needs and abilities and keep the parents up to date with developments. Childminders will use written notes and keep records on each child that will be shared with the parent and CSSIW, as long as it is safe to do so. Such monitoring allows the childminder to monitor progress and take appropriate action/make suggestions if the child is not developing or may be undergoing difficulties in aspects of their life.
- Where childminders are working with families undergoing stress or particular difficulties, such monitoring and support is valuable in ensuring the particular (and often changing) needs of the child and family can be met.
- NCMA Cymru would welcome an evaluation framework for the Child Poverty Strategy for 2010 -2013 on the assumption that this framework would be ongoing and amended if necessary, to ensure it remains fit for purpose. From an NCMA Cymru point of view, any evaluation framework should reflect the contribution of childcare to children and families in poverty and also, ensure that if there are possible improvements to be made, that will help reduce child

poverty, there are avenues available for information to be shared between WAG and the childcare sector to improve provision.

- NCMA Cymru welcomes the proposed “**Outcome Measures Framework**” (OMF) for local authorities and Children and Young People’s Partnerships, and the current “**Demonstrating Success**” model. With the introduction and implementation of any new model of monitoring, adequate training and support is necessary for all parties who contribute. This has been an ongoing concern for the Third Sector and those supporting small businesses / organisations.

### **3. Do you think the policy action set out in the Delivery Plan will enable us to achieve our three strategic objectives and our vision for 2020?**

- The setting out of policy actions, highlighting the contribution of each area to tackling child poverty, is useful and should help provide clear focus to all Government departments, local authorities, voluntary/third sector organisations. It is vital that all organisations have clarity regarding their role and how the work they are doing is part of the drive to tackle child poverty. In this regard the policy action improves the chances of meeting child poverty targets.
- The delivery plan must be publicised across all sectors, not only children’s services, to ensure that all areas are doing what they can to ensure work, initiatives and policies are making a contribution to child poverty. This must not take the form of token gestures or ticking of boxes, but the fundamental commitment of organisations and departments to tailor relevant policies to ensure they are making a contribution to tackling child poverty.
- Public spending cuts being implemented currently do however mean that these targets remain ambitious, especially given the fact that tackling child poverty must be a cross-cutting strategy. Due to the inter-connected nature of many areas, it may follow that spending reductions in one area will subsequently have knock-on effects in other areas thus jeopardising ongoing work.
- On childcare, policy action must be detailed and committed to providing parents and families with a wide range of childcare options, which will compliment wider policies regarding health and the economy for example. For the vision to become a reality, genuine partnerships, within government and across sectors will be necessary.
- Funding will be a key part of any success, but will by no means be the only factor affecting the delivery of the strategic objectives. Tailored support for families is vital, whilst government policies must also encourage families to help themselves where possible and raise aspirations through educational equality.

#### 4. What is the best way to integrate local multi agency support for families living in poverty?

- In childcare, the needs of the child and family should be paramount, and therefore it is important that there is sufficient choice available for families in terms of the childcare provision available to them.
- The Welsh Assembly Government-commissioned Beecham Review<sup>2</sup>, established as part of the action plan to take forward the ‘Making the Connections’ strategy, provided a detailed and thorough overview of what Wales needed to do in order to modernise and improve the provision of public services in Wales.
- NCMA Cymru would suggest that there is a continuing need to work towards the themes contained within Beecham. Greater joint working and delivery, effective engagement with the citizen and a system of delivery placing the citizen at the centre of services, are the principles which must underpin the Child Poverty Strategy. As Beecham identified, patchy delivery of services across Wales, hold back progress in many areas and it is likely that child poverty is one of these. It is also one area where progress is badly needed. It is pleasing that the Assembly Government, local government, the voluntary and third sector are embracing joint working and delivery and partnership overall, but it is clear that such progress remains patchy and must be improved.
- Local multi agency support will benefit from shared visions and understanding that different policy areas can all contribute– a fact that Beecham made clear. Child poverty is an issue that connects many areas of service delivery eg. health, childcare, housing, education and therefore it is vital that every effort is made to target resources to achieve shared goals. As Beecham states:

*‘Policy development needs to pay much more attention to implementation process – to deploy resources across sectors to tackle interconnected issues....This is particularly crucial in respect of cross cutting challenges such as responding better to disadvantaged and minority groups’.*

Child poverty is certainly a ‘cross-cutting challenge’ that benefits from such thinking. To tackle child poverty, NCMA Cymru would suggest that support for childcare is a key element and along with investment in education, training, employment and other areas, this will hopefully make a difference.

#### **Conclusion**

NCMA Cymru supports the Welsh Assembly Government’s commitment to tackling child poverty and is committed to working with all partners to ensure home based childcare is supported across Wales, and is making an important contribution to children’s lives.

The Child Poverty Strategy and Delivery plan is to be welcomed and it is vital that support, commitment and investment in tackling this issue is forthcoming. It is

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<sup>2</sup> Beyond Boundaries: Citizen-Centred Local Services for Wales. 2006.

also important that this strategy compliments the legislative and regulatory developments affecting childcare in recent times eg. Children and Families Measure. This will help ensure that targets and goals around child poverty can be realised. The current review of Childminding and Day Care regulations and the updates to the National Minimum Standards for Childminders, must be undertaken with this Strategy and Delivery plan in mind, to ensure that Childminders are free to provide quality, flexible care whilst the sector also raises standards and is subject to effective regulation.

**NCMA Cymru**  
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