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## **NICEM SUBMISSION**

### **Consultation on Draft Childcare Strategy**

**OFMDFM  
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## **Introduction**

- 1.1 The Northern Ireland Council for Ethnic Minorities (NICEM) is an independent non-governmental organisation. As an umbrella organisation<sup>1</sup> we represent the views and interests of black and minority ethnic (BME) communities.<sup>2</sup> Our mission is to work to bring about social change through partnership and alliance building, and to achieve equality of outcome and full participation in society. Our vision is of a society in which equality and diversity are respected, valued and embraced, that is free from all forms of racism, sectarianism, discrimination and social exclusion, and where human rights are guaranteed.
- 1.2 Childcare is an issue of particular importance to BME communities in Northern Ireland (NI). Research has shown that formal childcare is significantly underutilised amongst BME communities, with only 31.8% of individuals using some form of formal service.<sup>3</sup>
- 1.3 This is unsurprising when one considers that BME families face numerous additional barriers to accessing formal childcare services. These barriers include, but are not limited to, the language barrier, the prevalence of non-traditional shift-work amongst BME workers and unfamiliarity in accessing services.<sup>4</sup>
- 1.4 Consequently, NICEM welcomes the opportunity to comment on the Department's proposals for a Childcare Strategy and to emphasise the need to ensure that services deliver for all families in NI on an equal basis.

## **Financial Barriers to Accessing Childcare**

- 2.1 One of the main barriers to accessing childcare in NI that has been highlighted within modern research is financial.<sup>5</sup> It is relevant, therefore, that BME communities in NI generally face poorer economic outcomes than their majority peers.

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<sup>1</sup> Currently we have 27 affiliated BME groups as full members. This composition is representative of the majority of BME communities in Northern Ireland. Many of these organisations operate on an entirely voluntary basis.

<sup>2</sup> In this document “Black and Minority Ethnic Communities” or “Minority Ethnic Groups” or “Ethnic Minority” has an inclusive meaning to unite all minority communities. It is a political term that refers to settled ethnic minorities (including Travellers, Roma and Gypsy), settled religious minorities, migrants (EU and non-EU), asylum seekers and refugees and people of other immigration status united together against racism.

<sup>3</sup> Kernaghan, D., ‘Believe in Childcare?: An Investigation into the Childcare Needs of Ethnic Minority Communities in Northern Ireland’ (2014), p.36

<sup>4</sup> *ibid* p.4

<sup>5</sup> *op cit* n 3, p.4

## Employment Inequalities

- 2.2 A number of factors are complicit in generating these outcomes. Perhaps the most prominent concerns employment inequalities. BME individuals across NI are disproportionately likely to be in employment that does not fully utilise their skills and qualifications.<sup>6</sup>
- 2.3 Additionally, BME individuals in NI are particularly vulnerable to exploitative employment. A combination of isolation, lack of language skills and the absence of adequate advice and information services contribute to this vulnerability.<sup>7</sup>
- 2.4 Related to this is the higher than average employment of BME individuals across the United Kingdom (UK) on 'zero-hours' contracts.<sup>8</sup> These contracts do not guarantee hours of work and thus constitute an unstable source of financial security.
- 2.5 The employment profile of BME communities in NI is also adversely affected by numerous additional factors, such as the lack of English language provision in NI and the disproportionate impact of the economic downturn on some communities.<sup>9 10</sup>
- 2.6 Ultimately, BME groups in NI face higher rates of unemployment and poorer economic outcomes, even in areas where they are more highly qualified on average than the majority population.<sup>11</sup>

## Access to Social Security

- 2.7 A further factor that contributes to poor economic outcomes for BME communities in NI concerns the accessibility of social security. A lack of awareness amongst some BME individuals of their entitlement to social security impedes their access to these resources.
- 2.8 Research has illustrated that there are high levels of unawareness concerning relevant childcare benefits amongst BME communities in NI (25.5% unaware of Working Tax Credit, 43.7% unaware of free part-time pre-school places and 69.5% unaware of childcare voucher scheme).<sup>12</sup>

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<sup>6</sup> Rogers, S. and Scullion, G., 'Voices for Change: Mapping the Views of Black and Minority Ethnic People on Integration and their Sense of Belonging in Northern Ireland' (2014), pp.22, 29 and 33

<sup>7</sup> Wallace, A. et al, 'Poverty and Ethnicity in Northern Ireland: An Evidence Review' (2013), p.25

<sup>8</sup> See: <http://qna.files.parliament.uk/qna-attachments/222389%5Coriginal%5CPQ%20224751%20ONS%2051.pdf>

<sup>9</sup> Equality Commission for Northern Ireland, 'Racial Equality Policy: Priorities and Recommendations' (2014), p.22

<sup>10</sup> McVeigh, R. and McAfee, C., "'Za Chlebeim": The Impact of the Economic Downturn on the Polish Community in Northern Ireland' (2009), p.52

<sup>11</sup> McAfee, C., 'The Impact of the Economic Downturn on the Black and Minority Ethnic People in the North West of Northern Ireland' (2014), p.33

<sup>12</sup> op cit n 3 p.49

- 2.9 While awareness of entitlements is an issue that affects the general population in NI, it is important to note that there are particular barriers to raising awareness amongst BME communities here, such as the language barrier, difficulty understanding the application process and the lack of appropriate advice services in NI.<sup>13 14</sup>
- 2.10 Furthermore, those who have No Recourse to Public Funds (NRPF) as a condition of their leave to remain in the UK are not able to access any of the social security measures that the draft Strategy seeks to promote.<sup>15</sup>
- 2.11 Ultimately, it is clear that the Strategy will need to find ways of overcoming the specific barriers that impede BME uptake of relevant benefits and devise alternatives where individuals have NRPF (discussed further below).
- 2.12 In terms of overcoming barriers, this should involve taking targeted actions to raise awareness of financial assistance amongst BME communities. For example, the adaptation of public information campaigns to reach those with limited English language skills<sup>16</sup>
- 2.13 Furthermore, the Strategy will need to ensure that appropriate independent advice services are in place to assist potential claimants. The current draft Strategy commits to supporting existing advice services, but the lack of bilingual advisors and interpretation services within these services limits their usefulness in overcoming the above-mentioned barriers.<sup>17</sup>

### Cost of Childcare

- 3.1 Finally, when taking all of the above factors into account, it is clear that the cost of childcare constitutes a particularly significant financial restriction to BME families that wish to utilise these services.
- 3.2 With the average cost of childcare being £156 per week – and some families spending 44% of their weekly income on childcare for a single child – it is understandable why 40% of BME parents have expressed dissatisfaction at the cost of childcare.<sup>18</sup>

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<sup>13</sup> op cit n 3 pp.47-48;

<sup>14</sup> Migrant Centre for Northern Ireland, 'The Welfare System and Black and Minority Ethnic Communities in Northern Ireland' (2014), p.7

<sup>15</sup> See: <https://www.gov.uk/government/publications/public-funds--2/public-funds>

<sup>16</sup> op cit n 3 p.53

<sup>17</sup> op cit n 14 pp.6-7

<sup>18</sup> op cit n 3 pp.7 and 11

- 3.3 To address this problem, some further subsidisation of childcare places for particular groups will need to be implemented. While this will incur initial public expenditure, there is evidence to suggest that costs may be offset by the greater economic activity resultant from parents utilising these services.
- 3.4 For example, the Scottish Government has projected that increased subsidisation of childcare would increase labour supply significantly; resulting in a £700 million increase in tax revenue that would balance the increase in public spending required to implement the service.<sup>19</sup>
- 3.5 While there are many potential models for subsidising childcare, introducing a 'cap' on childcare costs is an attractive option, as this is an approach that incurs less public spending than more comprehensive models.<sup>20</sup> By ensuring that caps are income-based, public spending could be further reduced.
- 3.6 It is notable that taking action in this way would assist families who have NRPF and are thus unable to take advantage of financial assistance that is provided directly.
- 3.7 NICEM recommends that the finalised Strategy provide for targeted awareness-raising actions regarding available financial assistance, such as campaigns directed towards BME groups and the translation of relevant documentation.**
- 3.8 NICEM further recommends that the Strategy provide for the establishment of appropriate, independent advice services, with integrated language support in order to improve the understanding and uptake of available financial assistance.**
- 3.9 NICEM additionally recommends that the Strategy introduce a means-tested cap on the cost of childcare, so that financially disadvantaged families, including those with NRPF, are able to improve their economic participation.**

### **Employment-related Barriers to Accessing Childcare**

- 4.1 Some BME families living in NI also face barriers to accessing childcare as a consequence of their employment. Research shows that a high proportion of BME individuals in NI work irregular hours, with 28% of respondents being employed on a shift pattern that involves daytime, night time and weekend work.<sup>21</sup>

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<sup>19</sup> Northern Ireland Council for Voluntary Action, 'NI Childcare Report and Appendices' (2014), p.17

<sup>20</sup> *ibid* p.20

<sup>21</sup> *op cit* n 3 p.6

- 4.2 Furthermore, as has been noted above, BME workers across the UK are disproportionately employed via 'zero-hours' contracts, which impede the arrangement and increase the expense of childcare due to the unpredictability of working hours.<sup>22</sup>
- 4.3 It is perhaps unsurprising, therefore, that around 33% of surveyed BME individuals have expressed dissatisfaction with the flexibility of NI's childcare provision in terms of accommodating those working irregular hours.<sup>23</sup>
- 4.4 It is reassuring, therefore, that the draft Strategy proposes actions to increase the availability of flexible childcare provision; although, it should be noted regarding the Strategy's proposal that childminders could help fill this gap that quality of childcare provision was the number one consideration of BME families when choosing childcare arrangements in NI.<sup>24</sup>
- 4.5 Consequently, it will be important to ensure that individuals providing childcare as part of the Strategy's flexible childcare proposals are appropriately qualified. This should include training on cultural competency, which is another key concern of BME families seeking childcare in NI.<sup>25</sup>
- 4.6 NICEM recommends that the Strategy include a commitment to ensuring that childminders, under Intervention XII, are qualified and have training on cultural competency.**

### **Awareness of Available Services**

- 5.1 One of the main issues affecting BME families who could utilise childcare is a lack of knowledge on available services. Research illustrates that the main source of information that BME families in NI would rely on for childcare is their friends, yet many migrants may lack an established network on which to rely for such information.<sup>26</sup>
- 5.2 The language barrier that some BME families face when attempting to access information on childcare services exacerbates this problem, with some BME individuals with language difficulties suggesting that accessing information from persons within their own community would be useful.<sup>27</sup>
- 5.3 In this regard, it may be useful to establish links between statutory agencies, community organisations and employers so that BME families may be supplied with information on childcare by relevant sources.

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<sup>22</sup> Pennycook, M. et al, 'A Matter of Time: The Rise of Zero-Hours Contracts' (2013), p.17

<sup>23</sup> op cit n 3 p.7

<sup>24</sup> ibid p.7

<sup>25</sup> ibid p.43

<sup>26</sup> ibid p.46

<sup>27</sup> ibid p.47

- 5.4 Difficulties in accessing information on childcare services are also interlinked with financial barriers, discussed above. While many BME individuals have supported the social media application and online resources utilised during the Strategy's first stage, others have stated that these resources will be unhelpful for those who cannot afford the devices required to access them.<sup>28</sup>
- 5.5 Consequently, if the Strategy is to improve the availability of information amongst BME communities in NI, it will need to focus on additional means of communication.
- 5.6 It is noted with approval that the current draft Strategy proposes to make information available via leafleting and information within childcare bounty packs, which will be translated into multiple languages.
- 5.7 In distributing this information, agencies should be mindful of key locations where parents are most likely to gather childcare information, such as doctors' surgeries, local groups (e.g. mother and toddler's, church groups) and community/voluntary groups.<sup>29</sup>
- 5.8 It is further noted that the current draft Strategy proposes a promotional campaign highlighting the benefits of childcare services. The Department should ensure that steps are taken - such as the translation, adaptation and placement of relevant materials – to deliver this campaign's message to BME communities in NI.
- 5.9 NICEM recommends that the finalised Strategy contain a commitment to disseminate translated materials through doctors' surgeries, local groups and community/voluntary organisations.**
- 5.10 NICEM also recommends that the Strategy establish mechanisms to facilitate collaboration between statutory agencies, community/voluntary organisations and employers in order to facilitate information-sharing and the delivery of English language classes to tackle the language barrier.**
- 5.11 NICEM further recommends that any future campaign on highlighting the benefits of childcare services be appropriately adapted to ensure that BME communities are accessed.**

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<sup>28</sup> ibid p.47

<sup>29</sup> ibid p.46

## **Lack of Culturally Appropriate Services**

6.1 A further barrier to BME families wishing to utilise childcare is the lack of culturally appropriate services in NI. All families have particular expectations of the cultural or religious environment in which their child will be raised, but for BME families seeking childcare services in NI it can be difficult to obtain appropriate arrangements.

6.2 83.3% of BME respondents to recent research indicated that it was important for childcare providers to have an understanding and sensitivity towards the child's home culture, with religion and food being highlighted as important aspects of this sensitivity.<sup>30</sup>

6.3 It should be noted that the lack of culturally appropriate services in NI is part of a wider problem with supply. In England and Wales, the Childcare Act 2006 placed a statutory duty on local authorities to meet local need through the sufficient provision of children's centres.

6.4 However, there is no such requirement upon local authorities in NI. Consequently, while the years following the Childcare Act 2006 saw an increase in childcare provision elsewhere in the UK, this same period saw a decrease in provision in NI.<sup>31</sup>

**6.5 NICEM recommends that the Training Programme envisioned under Intervention XVI include training on cultural competency.**

**6.6 NICEM also recommends that childcare provision be placed on a statutory basis, so that local gaps in childcare provision may be assessed and addressed.**

For further enquiries about this submission, please contact the following:

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<sup>30</sup> ibid p.43

<sup>31</sup> Hinds, B., 'The Northern Ireland Economy: Women on the Edge?' (2011), p.42



