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Deputy First Minister**

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**Mr C Lyttle MLA  
Northern Ireland Assembly  
Parliament Buildings  
Stormont**

**30 September 2014  
AQW 35485/11-15**

**Mr C Lyttle (East Belfast):** To ask the First Minister and deputy First Minister in relation to the 2013 HM Treasury Consultation on Tax Free Childcare Payments/Childcare Payments Bill to detail (i) the response from their Department (ii) the stakeholders their Department consulted; and (iii) the responses they received to the consultation.

#### **ANSWER**

As the Member will know, the OFMDFM Committee wrote to the Department requesting this information. A copy of the Department's response has been placed in the Assembly Library.

**THE RT HON PETER D ROBINSON MLA  
First Minister**

**MARTIN McGUINNESS MLA  
deputy First Minister**

**Kathy O'Hanlon  
Clerk  
Committee for OFMDFM  
Room 285  
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**08 September 2014**

Dear Kathy

**LEGISLATIVE CONSENT MEMORANDUM – CHILDCARE PAYMENTS BILL**

Thank you for your letter of 3 July regarding the oral briefing by Departmental officials on the Legislative Consent Memorandum in relation to the Westminster Childcare Payments Bill.

During the oral briefing, officials agreed to provide the Committee with the following information:

- a copy of the Department's response to the 2013 HM Treasury/HM Revenue and Customs (HMRC) consultation on tax-free childcare;
- a list of the local stakeholders who were consulted on the 2013 HM Treasury/HMRC consultation; and
- the number of responses received by the Department, including copies of those responses.

A copy of the comments sent to HMRC in October 2013 is attached at Tab A. A list of local stakeholders who were contacted about the HM Treasury/HMRC consultation is attached at Tab B. Also included at Tab B is a list of all respondents to the HM Treasury/HMRC consultation. As regards the number of local stakeholder responses received, only two organisations copied OFMDFM into their response to HMRC. These responses can be found at Tab C.

The Committee also asked the Department:

- for an assessment of the impact the Childcare Payments Bill may have on parents who work zero-hours contracts; and
- to comment on Clause 30 of the Bill (which refers to Universal Credit and appears to expect that the Universal Credit system will be in operation here by the time the Bill is implemented).

Regarding zero hours contracts, the contractual position of parents will not determine whether they are eligible for the new tax-free childcare scheme. Parents on zero-hours contracts will be eligible for the new scheme in the same way as anyone else, provided that they meet eligibility criteria, including the rules around qualifying employment. Parents have to earn a little over £50 a week, on average, across a quarter to meet the minimum income level. This income level supports parents who are gradually moving into the workplace and those whose incomes fluctuate across this period. This should also cater for those on zero-hours contracts.

As regards Clause 30 of the Bill, the clause does not expect that Universal Credit will be in operation in Northern Ireland either by the date the new scheme comes into force or at any other time. All it does is cater for the possibility that Northern Ireland might have Universal Credit in the future.

The Committee forwarded a copy of the Employers for Childcare briefing paper on the Childcare Payments Bill to the Department for comment on the issues raised in the document. A response to the briefing paper was sent to the Committee on 4 August.

Finally, the Committee has written to express disappointment that it was not afforded the courtesy of notification of the 2013 HM Treasury/HMRC consultation on tax-free childcare and of the Department's response to that consultation. The Department regrets that the Committee was not notified about the existence of HM Treasury/HMRC consultation and the Department's response to that consultation. At that time, it was thought that the proposed new tax-free childcare scheme, like the current Employer Supported Childcare scheme, was an excepted matter. When it became clear that the proposed scheme was neither a tax nor duty (and therefore a transferred matter) the Committee was engaged after OFMDFM Ministers agreed to support the Coalition Government's policy and to promote a Legislative Consent Motion to extend the provisions of the Westminster Bill to here.

Yours sincerely

*Signed Colette Kerr*

**Colette Kerr**  
**Departmental Assembly Liaison Officer**

**HM TREASURY/HMRC CONSULTATION ON TAX FREE CHILDCARE  
(August to October 2013)**

**Comments from NI Government Departments sent to HMRC 25 October 2013**

Department	Response
<p>Department of Enterprise Trade and Investment (DETI)</p>	<p>DETI welcomes these proposals which are aimed at helping parents fulfil their career ambitions, and to mitigate against the scenario where they are prevented from working, by the high cost of childcare.</p> <p>DETI recognises that, as an employer, it will in future have staff who will wish to avail of the arrangements being proposed.</p>
<p>Department of Finance and Personnel (DFP)</p>	<p>The proposals appear to improve the options for support for childcare. In the current financial climate, any proposal to assist employees is to be welcomed and would be fully supported from a human resource perspective.</p> <p>DFP notes that the proposal would necessitate changes at the Corporate HR level. These would take time to implement and carry costs. It will not be possible to estimate the implementation timescale or cost until further details of any new arrangements are available.</p>
<p>Department of Health, Social Services and Public Safety (DHSSPS)</p>	<p>Parents of children with disability</p> <ul style="list-style-type: none"> <li>• Parents of children with disability often experience additional childcare costs compared with non disabled children's parents. Increased costs can relate to additional or specialist care requirements or a reduction in their child places to accommodate disabled children's needs. This may disincentivise providers to take on children with disabilities.</li> <li>• Registration of childcare providers in NI is to age 12, the outworking of the requirement for registration of providers with children with disabilities up to age 17 will need to be considered in NI.</li> </ul> <p>Online registration</p> <ul style="list-style-type: none"> <li>• The accessibility of online systems would need consideration both from parental assistance in completion and employer access to networks. Rural areas in NI have more limited access to broadband and mobile broadband.</li> </ul>

	<p>Registration of Childcare Providers Uptake</p> <ul style="list-style-type: none"> <li>• The proposals would be an effective method for encouraging the uptake of registration by non registered childcare providers.</li> </ul>
<p>Department for Social Development (DSD)</p>	<p>Tackling poverty and disadvantage is a Programme for Government priority and is the focus of much of DSD’s work. Paid work is recognised as one of the key routes out of poverty and, as such, many DSD interventions are targeted at eradicating or reducing the obstacles that individuals and families face in obtaining and sustaining employment.</p> <p>One of biggest challenges facing parents in this respect is meeting the costs of childcare. The new Tax – Free Childcare scheme will help more families than the current Employer Supported Childcare Scheme. The widening of the scheme to cover all employees (including the self employed) has obvious potential in terms of encouraging more people into work and helping those who do currently receive support with childcare costs to stay and progress in the labour market. To this end, DSD broadly welcomes the proposals as outlined in the consultation document.</p> <p>More detailed comments on the specifics of the design and operation of the new scheme are attached at <b>ANNEX 1</b>.</p>
<p>Issue raised in recent Ministerial correspondence</p>	<p>Recent correspondence to the Office of the First and the deputy First Minister (OFMDFM) noted that the proposals offer tax free childcare benefit to children born in or after September 2010. This may create an inequality for some NI children. The correspondent suggested that this date had been set to reflect the school system in England, ensuring that families with children starting primary school education in September 2015 would receive this benefit.</p> <p>The correspondent went on to say that, unlike in England, the age at which children here start primary school is the age at 1st July, not 1st September. As a result this scheme may create an inequality for an NI parent whose child has a July or August birthday—they will not benefit. A potential anomaly may therefore arise whereby some children in a class are eligible and some not.</p> <p>The correspondent recommended some flexibility regarding the date of birth criterion to ensure that all children within a primary school’s intake are equally eligible.</p>

## DETAILED COMMENTS FROM DEPARTMENT FOR SOCIAL DEVELOPMENT (DSD)

### General Comments

DSD officials have some general queries in relation to the content of the consultation paper (detailed below):

- Para 2.17, 3.21 & 3.26 include the term 'meaningful employment' – we feel this is an inappropriate overly judgmental term.
- Para 3.33 What is the definition of disabled child for Tax Free Childcare?
- Para 4.11 What disability benefits does the parent need to declare and why?
- Para 4.14 What impact does parents receiving Personal Independence Payment have on their entitlement to help through the scheme? Does this apply also to Disability Living Allowance?

### Responses to the Consultation Questionnaire

DSD officials have also answered those questions pertinent to the Department's remit:

#### **Chapter 3 – Tax-Free Childcare: eligibility**

#### **Q8: What are the potential benefits and risks of a minimum income rule or hours rule in defining qualifying employment?**

Q8: The introduction of a minimum income rule or hours rule may discourage people from taking up part time jobs/seasonal work or encourage them to stay on Universal Credit where they can get help with childcare regardless of the hours they work. The use of the term 'meaningful work' is also worrying. Is it not the case that any paid work has the potential to be meaningful, particularly in terms of encouraging self sufficiency through reducing benefit dependency? Indeed, does this thinking not underpin many of the welfare reform measures?

#### **Chapter 4 – Tax-Free Childcare: information and validation**

**Q13: Considering the objectives set out in paragraph 4.3, what information should parents provide when registering for Tax-Free Childcare? Would parents be content to pass personal information to a voucher provider, the Government, or other third-parties on registering for the scheme?**

Q13: If personal information was provided to the voucher providers, Government would need to ensure that this is held securely.

**Q15: Considering the objectives set out in paragraph 4.3, how quickly should the Government confirm eligibility based on the registration details provided to it? What should happen in cases where a parent is deemed to be ineligible for Tax-Free Childcare? How should the parent be informed?**

Q15: The Government would need to be in a position to confirm eligibility very quickly possibly within a week or ten days to encourage people to take up work and secure a place with the child care provider. If the parent is not entitled, should they be signposted to other help available? The parent could be advised by email if they have an email address.

**Q17: How quickly should parents be required to inform changes of circumstances that affect their eligibility, and how can they be reminded to do this? What does this mean for voucher providers' systems?**

Q17: Parents should be required to report changes of circumstances within a month but would parents want to report personal information to a voucher provider? Would the voucher providers systems be able to capture change of circumstances and how would these be notified to Government?

#### **Chapter 5 – Tax –Free Childcare: the market for vouchers**

**Q30 What should be the balance between protecting parents money and allowing providers to generate revenues from the funds that they hold?**

We need to avoid government investment. Providers must maintain and support separate/dedicated accounts to provide parents with vouchers while investing to cover operating cost and deliver a return. Providers could be appointed by government for a definite period subject to satisfactory operation (but not accredited). In doing so we would create an open market structure but still have appropriate controls in place. This would also create opportunities for social enterprises to enter the market and build alliances with child care providers.



## **Chapter 6 – Childcare Support through Universal Credit**

**Q31: How will the proposed change to Universal Credit affect people who have earnings that change from month to month?**

Q31: Those with fluctuating earnings or who are self employed may face some uncertainty with this system as they could be entitled to 85 per cent of childcare one month and 70 per cent the following month, or possibly not entitled at all in some months.

**Q32: The proposal is to use gross taxable earnings as a proxy for people whose earnings are above the tax threshold. What other proxies could the Government use?**

Q32: The Government could consider using net earnings as a better indicator of the actual take home pay. Net earnings are being considered by various Government departments as the indicator they will use to determine eligibility to passported benefits

**Q33: The Government wishes to ensure help is targeted at those who need it most within the fiscal constraints it faces. Should people who are getting Statutory Sick Pay, Statutory Maternity Pay, Ordinary Statutory Paternity Pay, Additional Statutory Paternity Pay, Statutory Adoption Pay and Maternity Allowance be entitled to the 85 per cent support or not?**

Q33: Childcare under Universal Credit continues to be paid if the claimant is in receipt of any of the above. If a lone parent or a couple normally earn enough to qualify for the 85 per cent support, Government may wish to consider continuing to provide this help for a short period of time for those in receipt of Statutory Sick Pay, Statutory Maternity Pay etc to ease the transition from a higher income as the parents will probably already be experiencing a drop in their income. However, the payment of the 85 per cent should only be for a limited period or tapered over a period of time.

**Q34: What information will people need to understand the impact of the measure on their own circumstances?**

Q34: Claimants would need to have clear information on how the monthly Income Tax Personal Allowance is calculated. It would also be helpful to have a tool to compare the support they would receive under UC to enable parents to decide which system provides the best support for their particular circumstance

## **Chapter 6 – Childcare Support through Universal Credit**

**Q35: Is offering a choice between Universal Credit and Tax-Free Childcare the best approach without driving up costs to the Government or increasing complexity for claimants? Should there be a limit on the number of times that a parent can switch?**

Q35: The aim of Universal Credit was to create one single income-replacement benefit for working age adults which unifies the current system of means-tested out of work and in-work benefits. There needs to be a simple method for claimants to work out if they are better off claiming Universal Credit or Tax Free Childcare so as to avoid confusion. The claimant will need to be clear about the overall picture since if they are on Universal Credit they may receive additional support if they qualify for passported benefits e.g. free prescriptions, uniform grant etc.

As childcare is a key enabler for parents to move into, or remain in, employment it is important that the scheme are easily understood and that parents can access any support they are entitled to. Limiting the number of times that parents can switch may disincentivise some to increase their hours/move jobs, however, this factor should be considered in conjunction with the administrative costs to Government associated with parents transferring between the schemes. Government may wish to consider a disproportionate costs approach e.g. it should not cost more to transfer a claim between systems than the increase in payment a parent would receive.

**Q36: How can the Government best design the process to ensure that the journey off Universal Credit is as smooth as possible?**

Q36: The process for moving claimants from Universal Credit would need to ensure there is no gap in the payment of childcare for the claimant.

**Q37: What information and tools do families in this position need to inform their decision and how can this best be provided?**

Q37: Claimants need to know what they will be entitled to under each scheme and be able to make comparisons. This could be in the form of an online calculator and also contain information on the criteria for, and support provided by, passported benefits.

## Chapter 6 – Childcare Support through Universal Credit

**Q38: A person who moves from one scheme to another will have practical concerns, for example how the balance on their childcare voucher account might affect their Universal Credit award. What factors are parents likely to take into account when deciding which scheme works best for them, and under what circumstances?**

Q38: The point at which claimants lose entitlement to Universal Credit may create a cliff edge as claimants may be reluctant to lose the 70 or 85 per cent help they receive towards childcare under Universal Credit.

Also, under Universal Credit, childcare is available to claimants for children up to age 16 years this may create a disincentive for claimants to take more work or higher paid work since the new scheme will only apply to children under five years in the first year and gradually build up to children less than 12 years. Claimants may be inclined to stay on Universal Credit and not increase their earnings if they can get more help with childcare under that scheme.

Claimants would need to be aware that if they give up their entitlement to Universal Credit then their Universal Credit will stop from the beginning of the assessment period they report it in, not the actual date that they notify Universal Credit. As this would result in a backdated claim termination date, this may mean they would lose out on childcare costs already paid out.

Additionally, as Universal Credit is assessed monthly, changes of circumstances affect the whole month payment so some claimants may not be entitled for the full month. Therefore claimants would need to be signposted to the new scheme to determine if they are eligible for it so they don't lose out on any assistance they may be entitled to.

**LIST OF STAKEHOLDERS CONTACTED BY OFMDFM  
(All those who responded to the '*Towards a Childcare Strategy*' consultation)**

**Organisations**

- 1 Northern Ireland Commissioner for Children and Young People
- 2 Employers for Childcare
- 3 Women's Resource & Development Agency
- 4 PlayBoard NI
- 5 Early Years
- 6 Equality Commission Northern Ireland
- 7 Northern Ireland Childminding Association
- 8 Area Childcare Partnerships
- 9 Barnardo's Northern Ireland
- 10 Northern Ireland Council for Voluntary Action
- 11 Children in Northern Ireland
- 12 Save the Children
- 13 South East Belfast Sure Start
- 14 Mencap
- 15 Disability Action
- 16 The Playwork Education & Training Council for Northern Ireland
- 17 Skills Active
- 18 Volunteer Now
- 19 Women's Support Network
- 20 Parenting NI
- 21 The Institute of Public Health in Ireland
- 22 South Belfast Partnership Board
- 23 Training for Women's Network
- 24 Northern Ireland Local Government Association
- 24 The National Children's Bureau NI
- 25 Footprints Women's Centre
- 26 Youth Action Northern Ireland
- 27 North-West Community Network
- 28 Play Services Ireland
- 29 The Alliance Party
- 30 Rural Community Network
- 31 Rural Network for Northern Ireland
- 32 UNISON
- 33 NI Committee, Irish Congress of Trade Unions (NICICTU)
- 34 Law Centre NI
- 35 Simon Community
- 36 NI Council for Ethnic Minorities

## **Day Care Groups**

- 1 Toddle in Day Nursery (Enniskillen)
- 2 Roger D'Arcy Joint Managing Director - Rascals Day Nurseries
- 3 Betty Boyle, Development & Education Manager, Foyle Daycare Limited
- 4 Christine Beckett, Happy Days Nursery
- 5 Audrey McCracken, Nurseries Director, Clear Day Nurseries
- 6 Tom Hunter, Joint Proprietor, Robins Nest Day Nursery
- 7 John Lindsay, Director, Jollytots (NI) Ltd
- 8 Alan Elliott, Partner, Fundays Childcare (Antrim)
- 9 Laura Fegan, Nursery Manager, Home from Home Daycare
- 10 Rosemary King, Merdyn Day Nursery
- 11 Howard Davey, General Secretary, Belfast YMCA
- 12 Clan Mor Sure Start

## **7 Individuals**

## LIST OF ALL RESPONDENTS TO HM TREASURY/HMRC CONSULTATION

<p> <b>1.4 in 10</b>  <b>2.4Children</b>  <b>3.Abacus Voucher Solutions</b>  <b>4.Active Kids Day Nursery</b>  <b>5.Advice NI</b>  <b>6.Airdale NHS</b>  <b>7.Allsave</b>  <b>8.Association of Accounting Technicians</b>  <b>9.Barnardos</b>  <b>10.Blackpool Council</b>  <b>11.Blois Meadow Day Nurseries Ltd</b>  <b>12.Bradford Metropolitan District Council</b>  <b>13.British Airways</b>  <b>14.Busy Bees</b>  <b>15.Cambridgeshire Council</b>  <b>16.Camden Council</b>  <b>17.CARE</b>  <b>18.Carillion PLC</b>  <b>19.Chartered Institute of Payroll Professionals</b>  <b>20.Chartered Institute of Personal Development</b>  <b>21.Chartered Institute of Taxation</b>  <b>22.Chartered Institute Payroll Professionals</b>  <b>23.Child Poverty Action Group</b>  <b>24.Childcare Voucher Providers Association</b>  <b>25.Children in Scotland</b>  <b>26.Children’s Society</b>  <b>27.Chwarae Teg</b>  <b>28.Citizens Advice</b>  <b>29.Citizens Advice (Northern Ireland)</b>  <b>30.Clybiau Plant Cymru kids Club</b>  <b>31.Confederation of British Industry</b>  <b>32.Co-operative Flexible Benefits</b>  <b>33.Cornwall Council</b>  <b>34.Crown Prosecution Service</b>  <b>35.Early Years – the organisation for young children</b>  <b>36.Employers for Childcare Charitable Group</b>  <b>37.Endenred UK Group Limited</b>  <b>38.E-ON UK</b>  <b>39.Family and Childcare Trust</b>  <b>40.Family Education Co Antrim</b>  <b>41.Family Education Trust</b>  <b>42.Federation of Small Business</b>  <b>43.Fideliti Ltd</b>  <b>44.Fun Lodge limited</b> </p>	<p> <b>45.Gingerbread</b>  <b>46.Glasgow City Council</b>  <b>47.Hampshire County Council</b>  <b>48.Information Commissioner’s Office</b>  <b>49.Islington Council, Early Years and Childcare Children’s Services</b>  <b>50.Joseph Rowntree Foundation</b>  <b>51.Linking Up Childcare Provider</b>  <b>52.London Borough of Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea and Westminster City Council</b>  <b>53.Low Income Tax Reform Group</b>  <b>54.Mid Lothian Council</b>  <b>55.Mid Yorkshire Chamber of Commerce</b>  <b>56.Mid Yorkshire Hospitals NHS Trust</b>  <b>57.Mothers at Home Matter</b>  <b>58.Motivcom PLC</b>  <b>59.Multi Resource Marketing Ltd</b>  <b>60.National Day Nurseries Association</b>  <b>61.NHS Employers</b>  <b>62.Northern Ireland Government Departments</b>  <b>63.Out of School Alliance</b>  <b>64.P&amp;MM</b>  <b>65.Playboard Northern Ireland</b>  <b>66.Policy Exchange</b>  <b>67.PriceWaterhouseCoopers LLP</b>  <b>68.Professional Association for Childcare and Early Years</b>  <b>69.Recruitment and Employment Federation UK</b>  <b>70.Resolution Foundation</b>  <b>71.Save the Children</b>  <b>72.Scottish Childminding Association</b>  <b>73.Scottish Out of School Care Network</b>  <b>74.Sodexo Motivation Solutions Ltd</b>  <b>75.Super Camps Ltd</b>  <b>76.The Association for Professional Nannies in the UK</b>  <b>77.The Mid Yorkshire Hospital’s NHS Trust</b>  <b>78.The Open University</b>  <b>79.Trade Union Congress</b>  <b>80.TURN 2 US</b>  <b>81.Twins and Multiple Births Association</b>  <b>82.UK Women’s Budget Group</b>  <b>83.Unison – The Public Service Trade Union</b>  <b>84.Wider Plan Limited</b>  <b>85.Working Families</b> </p>
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## LOCAL CONSULTATION RESPONSES RECEIVED BY OFMDFM

The Department received 2 responses from stakeholders in relation to the tax-free childcare consultation.

### Response 1

**From:** toddlein2 [<mailto:toddlein2@btconnect.com>]  
**To:** Childcare Consultation  
**Subject:** HM Treasury and HM Revenue and Customs  
**Importance:** High

To whom it may concern,

I have forward my response to the above consultation under the following link.

<https://www.gov.uk/government/consultations/tax-free-childcare>

Just to briefly mention some of the points which I had highlighted throughout this response please see summary below:

We have been operating our Day Nursery for almost nine years and during that period of time there has been many changes to the tax credit system. Initially the tax credit payment was paid directly to the child-care provider this process ceased as soon as we began to trade therefore we have little or no experience of how this process operated. When this process changed parents were receiving payments directly from the government through child tax credits as oppose to directly to the child-care provider. This had led to the lack of control of payment for the childcare provider. The parent was responsible for making the payment directly to the childcare provider which has both positive and negative implications. Unfortunately in some circumstances parents would leave with an outstanding balance which could not be recovered via this new system.

In 2005 there was the introduction of the voucher scheme. This initially was set up by Employers for Childcare. It was never promoted as a service for all parents only just to those whom knew about the facility. Parents whom were entitled to tax credits were uncertain about their eligibility for childcare vouchers as were we. There would have been slight confusion as to whom was eligible or not and still to date some parents are unaware of such schemes. Generally those parents whom do not work for a corporate organisation were not eligible. There was little or no communication/training about the voucher scheme at that particular time.

Personally I would feel that by introducing a single voucher provider would enable the process to be more consistent and cause less confusion as sometimes when there are too many options it can cause unnecessary frustration to parents. By providing training and information to all registered childcare providers to ensure that there is a clear and consistent message about this new voucher service. This should be highlighted before the introduction of the new Tax-Free Childcare. Ideally the government should propose to establish various focus groups in certain geographical area's in order to enable providers to meet to discuss and understand these new proposals.

An effective advertising campaign regarding the new Tax-Free Childcare is crucial. A similar example of a successful advertising campaign would be that of the 'Education Works Better When You Get Involved' an advertising campaign, aimed at raising awareness of the value of a good education and highlighting education works better when you get involved launched by Education

Minister John O'Dowd. Keeping the message simple and informative in order for parents to understand the message. It is essential that a similar run campaign to the above is in place for the Tax-Free Childcare implementation to ensure that everyone understands the benefits of the new system and how it will work.

**Kind Regards**

**Rosie Keaney**

**Manager**

**Toddle In 2 Ltd**

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## Response 2

Melanie,

Thank you for your email. I have responded to the consultation through the Survey Monkey facility but it does not allow for copying to yourselves. I have made a number of comments that may be of interest including:

1. Currently voucher companies are operating very well without any form of government regulation. This should continue.
2. Tax Free childcare should be at least 30% rebate as NIC is a tax.
3. Currently the 15 hours of nursery care per child does not reduce childcare costs for many working families as they still have to pay full time daycare fees for the child to be delivered to & collected from the nursery school. These 15 hours would be better in the form of a voucher that could be used in a nursery school or a daycare.

Regards

Howard

**YMCA** *putting Christian principles into practice through programmes that build healthy spirit, mind and body for all.*

City of Belfast YMCA is a limited company and a charity.  
Company Number NI 04741  
Charity Number XN 45743