

EQUALITY COMMISSION FOR NORTHERN IRELAND

Policy Positions on Childcare: Maximising the Economic Participation of those with childcare responsibilities, usually Women.

March 2013

1 Background

- 1.1 In 2008, the Commission's shadow report on the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), stated that "*Over 32 years since the inception of the Sex Discrimination Order (1976), having caring responsibilities for children, disabled people and/or older people still has a critical impact on women's experience of gender equality in Northern Ireland*"¹. The Commission's 2007 "*Statement on Key Inequalities*"² indicated that inequalities for women in education, employment, health and social care and participation in public life are compounded by the issues of care and caring.
- 1.2 The Commission's 2008 CEDAW Report made specific recommendations that the number of childcare places in Northern Ireland be increased and that places be responsive to need in taking account of the evening and weekend working patterns of women, and in relation to cost and availability³.

2 Executive Summary

- 2.1 The Commission considers that appropriate, accessible and affordable childcare provision in Northern Ireland should, alongside providing for the child, additionally seek to promote equality of opportunity for parents and benefit wider society and the economy.
- 2.2 While the current economic climate will inevitably mean that budgets will be constrained, resources will need to be deployed in a range of areas, including childcare, if economic policy goals are to be attained, and if gender inequalities in

¹ ECNI (2008). CEDAW Report: United Nations Convention on the Elimination of all forms of Discrimination against Women. ECNI: Belfast.

² ECNI (2007). Statement on Key Inequalities in Northern Ireland. ECNI: Belfast.

³ <http://www2.ohchr.org/english/bodies/cedaw/docs/ngos/ECNIUK41.pdf> - CEDAW Report, ECNI, 2008 (Report cites unpublished research – Gray, Bugel: The Demand for, and Supply of, Childcare in Northern Ireland, ECNI, 2002)

employment are to be tackled. While additional resources may be required in some areas, a more integrated and cross-departmental approach may serve to deliver others.

2.3 The Commission recommends:

- appropriate, accessible and affordable childcare provision to meet the needs of all children – including disabled children, children from BME communities and new residents, and those from rural communities.
- urgent action to address shortfalls in provision of childcare for the under 2's and for before and after school activities that alongside providing for the child, might facilitate wider economic participation.
- Government to review the revenue streams and costs of childcare provision, and explore innovative ways of developing and supporting childcare to maximise the quality and sustainability of provision, including during times of fluctuating or lower demand.
- continued and increased efforts to maximise the flexibility offered by employers and to tackle gender stereotypes concerning childcare roles – both in employment and in society - to promote greater employment equality.
- childcare provision to take account of the conditions that would facilitate parents to enhance their employability skills, return to work and/or maximise their contribution to the economy.
- a single Department to be given lead responsibility for the development and implementation of comprehensive childcare provision. This role must extend beyond coordination and should ensure that childcare delivers appropriate, accessible and affordable provision for a range of stakeholders, across the remit of a range of Government Departments.
- that responses to the December 2012 OFMDFM Consultation 'Towards a Childcare Strategy' are used to inform subsequent consultation once clear policy options have been developed, and that OFMDFM utilises the current opportunities, including engagement with stakeholders and other Government Departments, to collect relevant data/evidence to develop clear policy options and inform screening and any subsequent equality impact assessment of the policy proposals.

3 A Childcare Strategy for Northern Ireland

- 3.1 The Executive's Programme for Government 2012-15: Building a Better Future (PfG)⁴ contains a commitment to "*publish and implement a Childcare Strategy with key actions to provide integrated and affordable childcare*". In December 2012, OFMDFM published '*Towards a childcare strategy: A Consultation Document*'⁵.
- 3.2 In developing the Commission's Corporate Plan 2012-15 we identified opportunities in both the Programme for Government and through CEDAW shadow reporting in 2013 to advance equality arguments identifying the role of childcare in maximising the economic participation those with child care responsibilities, usually women.
- 3.3 On 20 February 2013, the Commission published and launched an expert paper, "Childcare: Maximising the Economic Participation of Women"⁶ compiled by academics from Napier University. It is intended that the expert paper serves to inform the development of childcare policy options in Northern Ireland by providing a brief overview of current childcare in Northern Ireland regarding the availability, quality, flexibility, accessibility and affordability of various types of childcare. Alongside this, the expert paper considers the extent to which working parents in general, and women in particular, may be constrained in their ability to access various types of work for reasons associated with existing childcare provision. The paper examines a range of evidence and best practice locally and further afield and makes a number of policy recommendations for immediate and longer term action.
- 3.4 The research can be downloaded from
- **Research Summary:**
<http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/MaximisingChildCareSummary2013.pdf>

⁴ Final Programme for Government 2011-15: Building a Better Future (PfG).

<http://www.northernireland.gov.uk/pfg-2011-2015-final-report.pdf>

⁵ <http://www.ofmdfmi.gov.uk/childcare-strategy-consultation-document.pdf> - Towards a Childcare Strategy, a consultation document, OFMDFM, 2012

⁶ McQuaid, R., Graham, H., Shapira, M., (2013), *Childcare: Maximising the Economic Participation of Women*, Equality Commission for Northern Ireland.

▪ **Full Report:**

<http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/MaximisingChildcareMainReport2013.pdf>

Childcare Provision in Northern Ireland

3.5 Data from the expert paper indicates that although provision has clearly expanded over the last decade, *“55,914 places still represents less than one place for every six of Northern Ireland’s 354,703 children aged fourteen and under.”*⁷

Further, while over 90 per cent of children in Northern Ireland between 3 years and the mandatory school age take up a pre-school place before starting primary school, they do so only on either a 2.5 or 4.5 hour basis. Parents seeking to work full-time must therefore consider how to access and combine childcare beyond the existing pre-school provision.

The expert paper argues⁸ that *“much of Northern Ireland childcare (e.g. playgroups, Sure Start centres) is not intended to facilitate employment, and its short, sessional format does not cover the hours that working parents require”*, noting that *“research has suggested that this provision is not always available or affordable for parents. Existing studies of childcare in Northern Ireland suggest that availability is patchy, insufficiently flexible, and not always of high quality, but prices are relatively high, especially when compared with average family wages. Some types of family may also face additional barriers to accessing childcare, such as those in rural areas, parents with disabled children or parents with more and/or very young children.”*

Maximising the Economic Participation of Women

3.6 The Commission has welcomed the Executive’s Programme for Government 2012-15 focus on equality as well as the economy and noted that it considers that effective childcare provision is a key driver to increasing women’s economic participation and in promoting gender equality. However, we are also concerned that the economic downturn, any associated rebalancing the Northern Ireland economy, and the provisions within the

⁷ Childcare: Maximising the Economic Participation of Women, opp cit, p48

⁸ Childcare: Maximising the Economic Participation of Women, opp cit, p7

Welfare Reform Bill and related policies may have significant impacts on the economic participation of women, and potentially further exacerbate the impacts of care and caring on inequalities.

3.7 The importance of affordable, good quality childcare in meeting the needs of children, families and the community as a whole is recognised by the First Minister and Deputy First Minister in the foreword to the 'Towards a Childcare Strategy' consultation document: *“Early Years interventions and good quality childcare services have important benefits for children, nurturing their social and emotional development. While some parents will choose to stay at home with their children, many want, or need, to find ways of combining work and family life. Childcare is a key element of opening the labour market to parents, and assists in moving families out of poverty which in turn contributes to increased economic activity levels and a more productive economy. This benefits all of us by supporting the Executive’s key objectives of growing the economy, reducing poverty and building a better and brighter future for all.”*⁹

3.8 The expert paper, however, argues that there is currently insufficient provision of childcare places of all types in Northern Ireland; and that costs, lack of flexibility and adequacy of provision is another effective barrier to women returning to the workforce.

3.9 The Commission¹⁰ agrees with the conclusion that *“Improvements to childcare provision in Northern Ireland are long overdue, and central to economic prosperity, poverty reduction and other Government aims, and should be treated as such”*.

4 Policy Recommendations: Childcare in Northern Ireland

4.1 The Commission considers that appropriate, accessible and affordable childcare provision in Northern Ireland should, alongside providing for the child, additionally seek to promote

⁹ <http://www.ofmdfmi.gov.uk/childcare-strategy-consultation-document.pdf> - Towards a Childcare Strategy, a consultation document, OFMDFM, 2012

¹⁰ Childcare: Maximising the Economic Participation of Women, opp cit, p11

equality of opportunity for parents and benefit wider society and the economy.

4.2 While the current economic climate will inevitably mean that budgets will be constrained, resources will need to be deployed in a range of areas, including childcare, if economic policy goals are to be attained, and if gender inequalities in employment are to be tackled. While additional resources may be required in some areas, a more integrated and cross-departmental approach may serve to deliver others through increased efficiency and effectiveness in achieving policy goals

4.3 The Commission has recommendations in 5 key areas:

A: Childcare provision to meet the diverse needs of children in Northern Ireland

4.4 Childcare must be appropriate, accessible and affordable to meet the diverse needs of children across Northern Ireland.

4.5 It is clear that there are key equality issues around access to childcare¹¹:

- childcare provision for disabled children was identified as very deficient, with not enough suitable facilities for them;
- migrant, minority ethnic and Traveller families have additional requirements from childcare services that are not being fully met at present. Some face cultural and language barriers; services are not inclusive enough; and childcare costs are important, as such families are often a lower income group;
- lone parents experience more acutely many of the issues faced by couples, and face additional barriers to using childcare and maintaining employment;
- parents with more than one child, and those with young children also face high childcare costs and difficulties in balancing work and childcare;
- problems in accessing childcare in rural areas were identified, made difficult by poorer transport links and problems with the sustainability of providers.

¹¹ Childcare: Maximising the Economic Participation of Women, Opp Cit.

4.6 For some of these, the issue is one of availability; there is a lack of suitable facilities for disabled children, and provision is variable outside of urban areas. For others, it is more an issue of affordability, for example for single parent families, who struggle to pay high childcare costs on a single income. For Traveller and minority ethnic families, the main barrier may be one of accessibility, with lack of local family support networks limiting access to informal care and language and cultural barriers limiting access to wider childcare services. Some families will face more than one of these issues, and thus multiple barriers to accessing childcare and taking up employment.

4.7 The UN Convention on the Rights of the Child, (UNCRC)¹², UN Convention on Rights for People with Disabilities (UNCRPD¹³), and the Convention on the Elimination of Racial Discrimination (CERD)¹⁴ all impose obligations on Government to fulfil the rights of all children and particularly those from BME backgrounds or children with a disability.

4.8 **Recommendation:** The Commission calls for appropriate, accessible and affordable childcare provision to meet the needs of all children – including disabled children, children from BME communities and new residents, and those from rural communities.

B: Childcare provision to meet the diverse needs of parents and wider society

4.9 The Commission considers that alongside providing for the child, childcare provision should additionally seek to promote equality of opportunity for parents and benefit wider society and the economy – including maximising the economic participation of those with childcare responsibilities.

4.10 The childcare provision that does exist often does not meet the needs of working parents¹⁵:

¹² See [UNCRC Art 24 and 29](#) which informed the statutory duty to provide childcare in the Childcare Act 2006 (GB) See also art 2.1 in relation to safeguarding these rights without discrimination.

¹³ [UNCRPD Art 7](#)

¹⁴ See ICERD Art 1 and 2

¹⁵ Childcare: Maximising the Economic Participation of Women, Opp Cit.

- it may be insufficiently flexible, not covering the required hours to enable parents to take up employment opportunities;
- it may not cover all holiday/break periods adequately;
- due to its high cost relative to wages, it may be too expensive;
- parents may simply be unaware of suitable childcare that does exist, and the support that they could get to help access it, such as tax credits and childcare vouchers.
- the sustainability for providers of childcare was also identified as a potential barrier to uptake.
- quality of provision was also noted as an issue, impacting not only on the child, but also on the parent's willingness and confidence to use childcare and thus to take up employment.

4.11 The Commission considers that innovative use of community infrastructure, community halls, and in particular schools (as part of the extended schools initiative¹⁶) could facilitate potential improvements alongside efforts to promote sustainability and quality. Schools are already ideally located to provide before and after school support and care, potentially delivering both accessible educative and caring provision. Actions to improve the status and qualifications of those delivering childcare would likely have benefits for those providing / working in childcare; as well as those using the services - children and parents.

4.12 **Recommendation:** The Commission calls for urgent action to address shortfalls in provision of childcare for the under 2's and for before and after school activities, that alongside providing for the child, might facilitate wider economic participation. The current model of provision, from 8am to 5 or 6pm does not fit well with a growing number of people's working lives. Additionally the current preschool provision of 2.5 or 4.5 hours does not facilitate a parent to return to substantial or full-time employment if they have no other support.

¹⁶ Extended schools provide for a range of services or activities outside of the normal school day to help meet the needs of nursery, primary, secondary and special school children, their parents, families and local community. These include activities, classes and support for learning <http://www.nidirect.gov.uk/extended-schools>

4.13 **Recommendation:** Government should review the revenue streams and costs of childcare provision, and explore innovative ways of developing and supporting childcare to maximise the quality and sustainability of provision, including during times of fluctuating or lower demand.

C: Demand for childcare – overcoming attitudes to childcare and mother’s employment

4.14 Gender stereotyping and social attitudes to the mother’s role in parenting and work undoubtedly impacts on the numbers of women in work. Although roles are changing, there is still a stereotype that fathers earn and mothers care. The economic reality is that very often both parents need to work to meet household costs, at least part time, and the historical notion of childcare being a women’s issue is outdated. A related issue is the lack of diversity in those working in childcare, particularly the low numbers of males in this profession. It is clear that¹⁷

- family policy both reflects and perpetuates this division of labour, with leave entitlements after the birth of a child that have historically been weighted towards mothers taking more time out of the labour market to care for children than fathers;
- cultural attitudes towards working motherhood should be examined and challenged;
- parents need employers who can be tolerant not just of the ongoing need for flexibility in trying to reconcile work and childcare, but also of the unpredictable absences that children may necessitate. This is particularly the case with lone parents, as the need for flexibility and emergency time off cannot be shared with a partner, and thus between two employers.

¹⁷ Childcare: Maximising the Economic Participation of Women, Opp Cit.

4.15 **Recommendation:** The Commission calls for continued and increased efforts to tackle gender stereotypes concerning childcare roles – both in employment and in society - to promote greater employment equality. There is a need to maximise the flexibility offered by employers and to improve understanding of the position of mothers in the labour market and the role of childcare in this (including mothers who are in work, seeking work and not-seeking work). There is need for acceptance and recognition of a greater emphasis on both women and men taking childcare responsibility (including parental leave) and building appropriate, accessible and affordable childcare around this.

D: Demand for childcare – overcoming barriers to parental employment

4.16 Current economic policy is centred on maximising the proportion of the available workforce in work and contributing to the economy. Aligned to this, the benefits and welfare reform agenda will seek to move people to return to, or take up employment. Under ‘Making Work Pay’¹⁸ the Government’s stated aim is to ensure that all families will be better off working than on benefits.

4.17 The provision of and uptake of childcare (or lack thereof) should also be seen in the overall context of overcoming wider barriers to parental employment - including employability skills. Childcare alone will not be sufficient to maximise the economic participation of parents, but should be delivered in a way which facilitates parents to overcome barriers to work.

4.18 Specific barriers¹⁹ include:

- mainstream employment programmes do not always address the needs of mothers trying to get into, or back into, work;
- confidence is a key issue in getting low skilled women into the labour market, but also getting women to return after a period of time out;
- childcare greatly effects women in work, both in the short-term (e.g. the ability to deal with sickness of their child) and

¹⁸ [See DWP statement 24th May 2012](#)

¹⁹ Childcare: Maximising the Economic Participation of Women, Opp Cit.

with their long term career (which may be effected if they are unable to return to work in the same type of role);

4.19 **Recommendation:** The Commission calls for childcare provision in Northern Ireland to take account of the conditions that would facilitate parents to enhance their employability skills, return to work and/or maximise their contribution to the economy.

E: Leadership and cross-departmental delivery of integrated policy goals

4.20 If childcare is to deliver on a range of policy goals – for children, parents, society and the economy then a clear strategy with clear leadership, supported by cross-departmental working, will be required.

4.21 It is argued²⁰ that:

- currently there is a lack of centralised strategic direction - elements of responsibility sit with different government departments, but no single department is responsible for ensuring that overall provision is adequate and meets the needs of working parents.
- there is a need to better align different rationales for different kinds of childcare. If working parents are to be supported, it is necessary to consider the extent to which other kinds of childcare (e.g. that provided for educational reasons) might be used to meet aims such as enabling parental employment;
- childcare should receive greater priority because of its crucial role in helping parents to work, but it needs to be funded in a realistic and sustainable way that shares – between the government, parents, childcare providers and employers – the burden of an adequately resourced childcare system that provides good outcomes for children.

4.22 While the current economic climate will inevitably mean that budgets will be constrained, resources will need to be deployed in a range of areas, including childcare, if economic policy goals are to be attained, and if gender inequalities in

²⁰ Childcare: Maximising the Economic Participation of Women, Opp Cit.

employment are to be tackled. Alongside this, cross-departmental working should lead to increased efficiency and effectiveness in achieving policy goals

- 4.23 Government support for childcare must have clear leadership and be strategically integrated across departments, agencies and other bodies and funding streams. Many of the above recommendations will require cross-departmental planning and delivery.

4.24 **Recommendation:** The Commission considers that a single Department should given lead responsibility for the development and implementation of comprehensive childcare provision. This should include cross-departmental planning and delivery of services, working together, to deliver childcare services to meet the recommendations set out above. This role must extend beyond coordination and should ensure that childcare delivers appropriate, accessible and affordable provision for a range of stakeholders, across the remit of a range of Government Departments. The provision of childcare must be recognised as, alongside providing care for the child, playing a pivotal role in growing and rebalancing the economy, and should be resourced accordingly.

5 “Towards a Childcare Strategy: A consultation document”

- 5.1 As noted earlier in this paper, in December 2012, OFMDFM published *‘Towards a childcare strategy: A Consultation Document’*²¹. Below we set out our views on the consultation document.
- 5.2 The Commission welcomes work towards the development of a childcare strategy for Northern Ireland along with the recognition by the First Minister and Deputy First Minister in the foreword that: *‘Childcare is a key element of opening the labour market to parents, and assists in moving families out of poverty which in turn contributes to increased economic activity levels and a more productive economy. This benefits all of us by supporting the Executive’s key objectives of growing the*

²¹ <http://www.ofmdfmi.gov.uk/childcare-strategy-consultation-document.pdf> - Towards a Childcare Strategy, a consultation document, OFMDFM, 2012

economy, reducing poverty and building a better and brighter future for all.'

5.3 We further welcome the aim of the strategy *“to promote the availability of good quality, accessible, integrated and affordable childcare provision that is sustainable in the long-term. Working with key partners, we aim to:*

- *support the development of children and young people and enable children and young people from the most deprived backgrounds to avail of life opportunities;*
- *support increased parental participation in the workforce, thereby making a significant impact on the economy, families and communities; and*
- *support learning and development activity which will improve opportunities for employment.”*

5.4 We also welcome:

- the proposed principles [set out in paragraph 3.2 of the consultation document] – affordability, accessibility, sustainability, an integrated approach, quality and informed parental choice;
- the continuing work in research, economic modelling, development of pilot projects, support and enhancement of existing provision [para 1.10];
- identification of a number of anticipated actions [para 1.9];
- the intent to align childcare with other policy initiatives [para 2.3], though the emphasis does not appear to extend to alignment with wider economic participation goals;
- the mixed model of provision [para 2.];
- appreciation (though limited) of the role of employers [para 2.8];
- a rights based approach to disability [para 2.13];
- the commitment to special provision for minority ethnic communities [para 2.14].

5.5 However, we have a number of concerns about the document, for example:

- While the document refers to the potential for a childcare strategy to deliver on policy goals beyond the care and

education of the child, it is not clear that this has been embedded across the consultation document and thus in any implementation that might follow. For example paragraph 2.3, which refers to alignment with the Executive key policy initiatives, does not include reference to the Gender Equality Strategy. The same omission is evident in the (seven page) annex which outlines existing policies of relevance.

- The apparent lack of consideration of the Gender Equality Strategy suggests a lack of gender focus in the childcare consultation document, despite two discrete sets of benefits (employment for women, family life for men) that potentially can accrue from good childcare policies and practices.
- While the document contains a vision, aim and proposed principles, it does not set out clear policy options for the delivery of childcare in Northern Ireland. Instead the document tends to referring to aspirations and plans to take account of various factors and develop options, in many instances using the consultation questions to attempt to gather initial evidence rather than assess proposed options.

5.6 As such, it is the Commission's view that the consultation on "Towards a Childcare Strategy" tends more towards a pre-consultation exercise as would be recommended good practice in gathering initial data/evidence towards assessing equality impacts and developing policy options. We would expect a consultation once clear policy options have been developed. We recommend that OFMDFM further consult when policy options are more clearly defined.

5.7 We would also highlight the importance of OFMDFM considering its responsibilities to assess the equality impacts, at the same time and iteratively, alongside the policy development process and that OFMDFM should use the current consultation as a means of gathering views on the potential equality impacts of policy proposals being discussed. We would also recommend that OFMDFM should gather and analyse equality data now and as part of the current consultation for use in screening and any subsequent equality impact assessment of policy proposals.

5.8 We would further advise that OFMDFM should screen policies and associated budgets at the earliest opportunity and consider EQIA. Screening is most useful if it is introduced at an early

stage when developing or reviewing a policy, or during successive stages of implementation (e.g. strategic review, options paper). Policy proposals and any EQIA should be consulted on at the same time. This would be in line with Commission Section 75 Guidance and model scheme which states: *‘For more detailed strategies or policies that are to be put in place through a series of stages, we will screen at various stages of implementation’*.

- 5.9 While paragraph 1.2 of the consultation notes that OFMDFM *“is taking the lead role in developing and co-ordinating the Strategy, working in partnership with other Government Departments which have lead responsibility for key policies relevant to childcare”*, the lack of detailed policy options in the current document means that it is not clear that this approach will ensure integrated cross-departmental working to deliver the range of policy goals, rather than simply the coordination of disparate departmental remits.
- 5.10 OFMDFM should also consider, and discuss with other Government Departments, the implications of / interactions with welfare reform on any childcare proposals and possible mitigating measures.
- 5.11 We are also disappointed that the series of consultation events which runs from 20 February to 4 March was not announced until 13 February and the events, all to be held 19.00-20.30 appear to offer no childcare support.

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| 5.12 | Recommendation: The Commission recommends that responses to the December 2012 OFMDFM Consultation ‘Towards a Childcare Strategy’ are used to inform subsequent consultation once clear policy options have been developed, and that OFMDFM utilises the current opportunities, including engagement with stakeholders and other Government Departments, to collect relevant data/evidence to develop clear policy options and inform screening and any subsequent equality impact assessment of the policy proposals. |
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6 Conclusions

- 6.1 The Commission considers that alongside providing for the child, childcare provision should additionally seek to promote equality of opportunity for parents and benefit wider society and the economy.
- 6.2 In considering options for change, the Commission's expert paper looked within and beyond Northern Ireland for examples of good practice in childcare and maternal employment. The Commission agrees that *"the most effective combination of family and childcare policies for encouraging female labour market participation is one that offers a combination of paid parental (maternity and paternity) leaves and flexible job arrangements (including part-time jobs, flexible working hours, and job-sharing), alongside an adequate coverage of affordable childcare facilities"*²².
- 6.3 Broadly speaking, in Northern Ireland there is insufficient access to appropriate childcare, the cost is too high and the expansion of childcare places through schools (preschool year) while providing some level of support, needs to be expanded to cover more hours per child. These tangible aspects are relatively simple to address. However the Commission recognises that attitudinal issues, gender stereotyping and the associated models of childcare and its wider role are more complex to address
- 6.4 The delivery of improved childcare needs to be a key priority for policymakers, and greater action is needed on improving childcare that assists in helping parents into employment. At the societal level, attitudes are changing with respect to parenting and the extent to which men might take on these responsibilities as well, but caring currently remains an issue that is disproportionately undertaken by women. Cultural change, at all levels, is thus crucial for addressing the impact that children have on mothers' labour market participation.
- 6.5 As noted above there are shortfalls in relation to provision of appropriate, accessible and affordable childcare in Northern Ireland. Bearing in mind the focus of economic policy on maximising economic activity there is evidence that provision has failed to meet current needs and is unlikely, unless

²² Childcare: Maximising the Economic Participation of Women, opp cit, p11

reformed, to have the capacity to meet future needs. The Executive must take action to address these shortfalls if it is to achieve the vision and policy aims set out in the *'Towards a Childcare Strategy'* consultation document.

Legal, Policy and Research Division
March 2013