



# **Performance Audit**

## **Child Care Arrangements for Public Employees**

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### List of Abbreviations

CBU	Collective Bargaining Unit
CCTF	Child Care Task Force
CCU	Child Care Unit
DEH	Department for Environmental Health
DER	Department of Employee Relations
DSWS	Department for Social Welfare Standards
ERDF	European Union Regional Development Fund
ETC	Employment and Training Corporation
FMS	Foundation for Medical Services
KGH	Rehabilitation Hospital, Karin Grech
KNPD	National Commission Persons with Disability
MCAST	Malta College of Arts, Science and Technology
MCH	Mount Carmel Hospital
MDH	Mater Dei Hospital
MEEF	Ministry of Education, Employment and the Family
MEPA	Malta Environment and Planning Authority
MEU	Management Efficiency Unit
MFEI	Ministry of Finance, the Economy and Investment
MITA	Malta Information Technology Agency Limited
MPO	Management and Personnel Office
MQC	Malta Qualifications Council
MUMN	Malta Union of Midwives and Nurses
NAO	National Audit Office
SLH	St. Luke's Hospital
TCCDC	Technical Committee on Child Day Care
UOM	University of Malta
WSC	Water Services Corporation
ZCH	Zammit Clapp Hospital



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## Executive Summary

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## Executive Summary

1. Since the early 1990s, a small number of public service and public sector organisations have introduced child care arrangements for their employees. Such arrangements can be offered either through the direct provision of child care services at the workplace or by giving financial assistance to those employees using external facilities during work hours. Employers' arrangements for child care complement other family-friendly measures already being offered on a wider scale to certain categories of public employees.

2. It is Government's policy to enhance a pro-family environment, increase the number of child care facilities and encourage women to remain within or return to the labour market. Different measures have been adopted by Government to encourage and facilitate access to child care. These have included tax incentives, promotional campaigns, the launch of the National Standards for Child Day Care Facilities, and the financing of new child care centres in different localities.

3. The Ministry of Education, Employment and the Family (MEEF) is the current lead Ministry responsible for the Government's policy on child care and the development of standards on a national scale. The Department for Social Welfare Standards (DSWS) within MEEF assists child care service providers in developing their facilities and supports them in meeting the National Standards. The Department is also responsible for the registration of those child care facilities that meet all the criteria. The number of registered centres has increased significantly since the introduction of the voluntary registration system.

4. Within the public administration, the Management and Personnel Office (MPO) is responsible for formulating, launching and monitoring policies that improve the work conditions of public officers. There is, however, no specific guidance from MPO on the policy to be adopted when making child care arrangements for public employees. In practice, individual organisations have developed their own policies and procedures related to the provision of child care.

5. Against this background, NAO undertook a performance audit to evaluate the introduction and management of child care arrangements. The main objectives of the study were to:

- (a) Carry out a cross-comparative assessment of how child care arrangements were introduced over the years for public employees and what led to the development of these individual initiatives.
- (b) Determine what systems and resources were required for the operation or outsourcing of child care services, as well as for the provision of financial support to employees paying for child care services.
- (c) Evaluate the respective benefits and opportunities derived from the application of different child care solutions as well as the challenges and risks faced by organisations providing these arrangements for their employees.

6. Details on the methods applied to the study are outlined in Appendix A. In brief, fieldwork consisted in a review of the child care arrangements offered by six case study organisations and interviews with DSWS. NAO would like to thank all the participating organisations for their collaboration during the performance audit. Unless otherwise stated, the findings in this report reflect conditions up to the end of February 2010.

### Key findings and conclusions

7. ***Evaluation and introduction of the initiatives:*** One of aspects assessed in the study (covered in Chapter 2) was the introduction of different child care arrangements for public employees, including the factors that contributed to their launch and the options that were evaluated.

- (a) In all six case studies, the development of child care arrangements was part of an overall management

drive and culture to improve work conditions. Moreover, these initiatives were aimed at providing a more supportive work environment that encourages a healthy work-life balance and equal opportunities. In addition, three organisations indicated that child care arrangements were specifically introduced to retain key employees and/or to attract new staff with the required qualifications, technical skills and competences. One of the case studies was also affected by pressure from staff and a trade union to give priority to the provision of in-house child care services.

- (b) Different measures were used by the case study organisations to gauge the interest of those employees who could potentially benefit from the initiative in the foreseeable future. All case studies reported that they had a sufficient number of staff with young children at the time when they were considering introducing child care at the workplace. However, it is difficult to accurately and reliably estimate take-up of these arrangements in the medium- and long-term as parents might change their intentions or their circumstances might alter. Experience has also shown that substantial investments made in in-house facilities to secure suitable premises, equipment and specialised human resources might back-fire if expected take-up by employees never materialises or dwindles over the years.
- (c) The internal functions responsible for corporate services were usually the most involved in the collection of information and the preliminary evaluation of the proposed child care initiatives.
- (d) The concept of child care has evolved considerably over the past twenty years. Today, the feasibility of an in-house facility needs to be more carefully assessed due to the considerable requirements set out in the National Standards for Child Day Care Facilities and by various authorities. The latter include DSWS, the Malta Environment and Planning Authority (MEPA), the Malta Qualifications Council (MQC), the National Commission Persons with Disability (KNPD), the Department for Environmental Health (DEH) as well as independent health and safety auditors.
- (e) Two of the case studies opted for solutions that involved less costs for the employer and allowed greater flexibility to adjust to shifts in demand for the services.
- (f) For several years, all the case studies have been successful in providing access to affordable and reliable child care services for a considerable number of public employees (refer to Table 2.4).

8. **Resources and organisation:** This was another aspect examined in detail in the study and discussed in Chapter 3.

- (a) The introduction of child care at the workplace entailed a range of new costs for the case study organisations, depending on the type of arrangement that they put in place. In-house services required considerable investment and relatively high operating costs (refer to Table 3.1). On the other hand, alternative arrangements, such as offering staff an established allowance for child care or fully outsourcing the service to an external provider, helped to manage and cap annual expenditure on child care benefits (refer to Table 3.2).
- (b) Only a proportion of the total child care costs were recovered by the case study organisations. The employers, nevertheless, considered these expenses as necessary to fulfil their overall strategic and human resource objectives and priorities.
- (c) Four of the six case studies had difficulties in securing an appropriate area for child care or found this option as being too expensive to pursue. In addition, considerable time had to pass before each of the centres obtained the required development permits from MEPA and holistically complied with the criteria established in the National Standards for Child Day Care Facilities and other regulations.
- (d) Substantial work and effort was required to prepare, develop and operate in-house facilities in four of the case studies. It was necessary to develop a number of new systems, policies and procedures applicable for the provision of child care. A sufficient number of specialised front-line and supervisory staff from outside the reviewed organisations also had to be engaged. Furthermore, the organisations had to define and establish the role and responsibilities of the Child Care Supervisor/Principal/Manager. Overall, establishing and operating in-house child care services involves considerable commitment, organisation and added responsibility.

## Recommendations

1. It may be more feasible to first consider making arrangements for employees to use the services of the increasing number of child care centres instead of embarking on projects to develop in-house facilities that require considerable investment and resources.
2. NAO, therefore, encourages Government to continue to provide incentives to the private sector and other interested parties to develop and operate child care

facilities in localities, especially those with several public service and public sector organisations.

3. There is also the need for Government to expedite the introduction of the envisaged regulatory legislation that defines the role, functions and responsibilities of DSWS as a national regulatory body for child care services. This is essential for the Department to have the required legal backing to effectively enforce the National Standards for Child Day Care Facilities established in 2006.

4. MPO should also issue a policy outline and guidelines similar to those released for other family-friendly measures. This policy document should clearly specify the objectives and the parameters within which a public service organisation can offer child care arrangements. In addition, guidelines can be developed to direct employers on the various requirements and issues to be taken into

consideration when developing child care arrangements for their employees.

5. Moreover, public service and public sector organisations should take into consideration the various factors and issues highlighted in this report when developing their own child care arrangements. The experience of the six case studies used as a basis for this evaluation has shown that, before embarking on a child care initiative, it is highly critical that a careful step-by-step assessment is undertaken (refer to section 2.3 and Figure 2.2 in Chapter 2).

6. In addition, lessons can be learned from the case studies on how to avoid certain pitfalls, exploit opportunities, as well as take in due consideration the challenges and risks involved (refer to section 3.4 in Chapter 3).





## Chapter 1

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### **The challenge: providing child care arrangements**

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## Chapter 1 – The challenge: providing child care arrangements

*Chapter 1 defines what is meant by the term ‘child care’ and discusses the benefits of such arrangements to employers, parents and children themselves. It also refers to the relevant national goals and standards; to the lead Ministry responsible for the implementation of child care policies; and to the opportunities that are offered by the State to encourage a broader take-up of child care services. The Chapter also outlines the scope, objectives and methodology of the study.*

### 1.1 Child care arrangements available to public employees

1.1.1 Child care arrangements refer to the direct provision of child care facilities at the workplace or the offering of financial assistance to reduce costs for child care services. Employers can provide on-site or nearby child care facilities that are only used and equipped for the provision of day care to children. Such facilities are open for set hours, provide a standardised and organised system of care and supervision and can cater for different ages. The various activities that can be organised for different age categories are outlined in Appendix B. Alternatively, an employer can subsidise the cost of child care by offering reimbursement schemes to employees using external service providers.

1.1.2 In terms of Legal Notice 53 of 1994 - Development Planning (Use Classes) Order (Chapter 356, Development Planning Act of 1992) - and its subsequent revisions, child care facilities fall within Use Class 8 (Education). According to the Supplementary Planning Policy Guidance, issued by the Malta Environmental and Planning Authority (MEPA), child day care facilities are primarily community care facilities and are therefore considered separately from kindergarten facilities.

1.1.3 Since the early 1990s, a small number of organisations within Government have introduced child care arrangements for the care of employees’ children

during work hours. Table 1.1 lists the various public organisations identified by the National Audit Office (NAO) in 2009 that were providing child care arrangements for public employees and/or the general public.

1.1.4 Apart from these services, working parents can also make use of free nursery education that the State provides for all children aged between two years nine months and five years at kindergarten centres in State Primary Schools. Alternatively, parents can pay to use the services of child care and kindergarten centres run by the Church or private institutions. In addition, parents can register their children during the summer holidays for summer school programmes organised by central and local government authorities.

### 1.2 Policy and structure

#### *On a national scale*

1.2.1 The introduction of child care arrangements reflects the Government’s policy to enhance a pro-family environment and increase the number of child care facilities. The National Programme (*Vision 2015*) lists the setting up of more child care facilities across the country as one of the priorities of Government in the area of social development. This goal also reflects the European Union target of providing, by 2010, child placements for at least thirty-three per cent of children under three years of age.

1.2.2 Fiscal incentives have also been introduced for women to remain within or return to the labour market. In 2007, amendments to legislation provided for a tax deduction for parents whose children (up to the age of three) attended child care facilities that were registered with the Department for Social Welfare Standards (DSWS). The deduction was up to a maximum of €932 (against receipts). From basis year 2008, the deduction was increased to €1,000. Government also announced that there are plans

**Table 1.1 Organisations across Government offering child care arrangements to public employees and the general public**

- *'Rehabilitation Hospital, Karin Grech'* (formerly Zammit Clapp Hospital) has, since 1991, made arrangements for its employees to use nearby child care facilities.
- *'It-Tajra'* was launched in 1992 at the University of Malta and offers facilities to children of both employees and students.
- *'Il-Passju'* was developed from a summer-based initiative launched in 2001 at the Employment and Training Corporation. In 2004 the Corporation started providing child care services continuously throughout the year.
- *'Nemo'*, opened in October 2007 at the Water Services Corporation and offers services only to children of employees.
- *'Staff Nursery – Mater Dei Hospital'* offers child care services to the children of employees at Mater Dei Hospital. The facilities were opened in November 2007 on a site near the Hospital following migration from St. Luke's Hospital.
- *'Magic Wonders'* at the Malta College of Arts, Science and Technology opened in May 2009 and offers care to the children of students, employees and the general public.
- *'Smart Kids'* child care facilities are available in Birkirkara, Birgu and Qawra. Other centres are located in Gharghur, Luqa and Raħal Ġdid. The latter are privately owned but tendered by Government. It was also announced that three other child care centres are to be opened in the Primary Schools of Bormla, Pembroke and Siġġiewi. Government also plans to have at least one centre in each of the ten State Colleges. In addition, facilities are to be also opened in Floriana, Msida, St Venera and Żejtun.
- *'Klabb 3-16'* opened in 2009 in the State Primary Schools of Birkirkara, Fgura and Naxxar for children aged between three and sixteen years. There are also plans to extend these services to two other schools during 2010.
- The Malta Information Technology Agency subsidises the fees of third party child care services used by employees during work hours. This arrangement was introduced several years ago.

Source: NAO Working Papers (2009)

to extend this incentive to parents of children older than three years of age attending a registered centre during the summer months. The amount of tax that is effectively deducted depends on the taxable income and the tax rates applicable to each individual taxpayer.

**1.2.3** Alternatively, employers who pay child care fees on behalf of their employees can benefit from this initiative through a similar deduction against their taxable income, given that such payments for care services per child can be satisfactorily verified. In addition, the child care fees covered by the employer on behalf of the employee are not considered as a fringe benefit for tax purposes and are hence exempt from taxation, as long as the same employee does not claim for the tax deduction. Government has also announced that it intends to offer tax reductions to cover costs incurred by employers who establish child care centres for children of employees.

**1.2.4** In 2009, Government launched a national grant scheme, part-financed by the European Union Regional Development Fund (ERDF), for private sector operators and Non-Government Organisations. €500,000 were allocated for this scheme which is aimed at improving existing child care facilities, financing the relocation of existing facilities to a more appropriate location, as well as at encouraging the establishment of new child care centres. This scheme is, however, not offered to public sector organisations.

**1.2.5** With effect from July 2007, Government offered child care facilities that were registered with DSWS the possibility of also registering as an educational establishment with the Directorate for Quality and Standards in Education in terms of the Education Act (Chapter 327). This renders them exempt from value added tax.

1.2.6 The Ministry of Education, Employment and the Family (MEEF) is the current lead Ministry responsible for the Government's policy on child care and the development of standards on a national scale.

1.2.7 In January 2001, a committee called the '*Child Care Task Force*' (CCTF) made up of various stakeholders was established to foster different forms of child care provision in Malta and to improve accessibility to high quality child care services. The members of the committee included the Ministry responsible for social policy, the Co-Operatives Board, the Employment and Training Corporation, the University of Malta, the Confederation of Malta Trade Unions, the Malta Employers' Association, the National Council of Women, and the General Workers' Union.

1.2.8 Furthermore, in May 2002, a working group called the '*Technical Committee on Child Day Care*' (TCCDC) was set up within the Ministry responsible for social policy. This working group evaluated the provision of child day care facilities and was involved in the drafting of national standards and a related consultation document.

1.2.9 DSWS, within MEEF, is responsible for assisting child care service providers in developing their facilities and for supporting them in meeting the National Standards (Table 1.2). The latest version of these standards was published in 2006 and is being used as a guide for registration with the Department. DSWS has personnel trained in the field to provide guidance and also has a Child Care Freephone for those requiring assistance and information.

1.2.10 In addition, DSWS registers those child care facilities that meet all the criteria set out in the National Standards. The number of registered centres (in different localities in Malta) has increased significantly since the introduction of the voluntary registration system (Table 1.3).

1.2.11 It is important to point out that child care facilities are currently being monitored on a voluntary basis. Draft regulatory legislation that will provide DSWS with the required legal framework to operate as a regulatory body for social welfare and care services (including the regulation of child care and child minding services) was developed in 2008. However, as at May 2010, the finalisation of the draft legislation for presentation to Parliament was still pending. As a consequence, the current legislative framework does not define the role, functions and responsibilities of DSWS as a national regulatory body. Moreover, the Department does not have the required legal backing to enforce the National Standards established in 2006 and, therefore, be totally effective and proactive.

1.2.12 In parallel, a National Child Care Unit (CCU) within MEEF was established in 2010 to support the development of child care centres falling under the remit of the Education Authorities and managed by the Foundation for Educational Services. The Unit is also involved in the development of national child care policies.

### *Within the public administration*

1.2.13 Within the public administration, the Department of Employee Relations (DER) that forms part of the Management and Personnel Office (MPO) is responsible for formulating, launching and monitoring policies which improve the work conditions of public officers.

1.2.14 The provision of child care arrangements complements other family-friendly measures already being offered on a wider scale to certain categories of public employees. Figure 1.1 lists the range of available measures aimed at supporting employees with children.

1.2.15 A more detailed description of each policy is outlined in Appendix C. A number of these family-friendly measures go beyond the minimum provisions of the law and are related to flexibility and work-life balance.

1.2.16 MPO has issued, amongst other documentation, a manual on family-friendly measures. There is, however, no reference in the latest version of this manual (dated October 2009) on any policy or guideline to be adopted by the public administration when making arrangements for child care. This observation is reflected in the overall recommendations of this report.

1.2.17 In 2009, benefits for child care were also not addressed in the provisions for family-friendly measures included in standard Collective Agreements negotiated by the Collective Bargaining Unit (CBU) of the Ministry of Finance, the Economy and Investment (MFEI).

1.2.18 Therefore, in the absence of specific guidance from MPO, individual organisations across the public sector are, in practice, expected to develop their own policies and procedures related to the provision of child care arrangements for their employees.

## **1.3 Benefits of child care arrangements**

1.3.1 Access to affordable and reliable child care facilities directly benefits public sector employers, public employees and children:

- (a) Child care arrangements can reduce tardiness, on-the-job stress and absenteeism of employees with children who have to balance their parenting responsibilities with their work commitments.

**Table 1.2 National Standards for Child Day Care Facilities**

Standard	Description
<b>Suitable Persons</b>	Includes standards on the appropriate ‘carer to child’ ratios, as well as the qualifications, knowledge and qualities of the appointed coordinator/s and carers in child care facilities. It also highlights the importance of supervision and staff development.
<b>Physical Environment, Premises and Equipment</b>	Presents the specifications of premises and equipment to be used as child care facilities, as well as the type of environment the facility should have. There is also an emphasis on what safety measures are to be taken.
<b>Management and Organisation</b>	Outlines the key principles governing the management and organisation of a child care facility including the engagement of a qualified and experienced manager. It also lists the contents of the Policies and Procedures Manual that each child care centre should have.
<b>Health and Safety for Children</b>	Specifies and lists what health and safety measures are to be taken in order to prevent and/or control mishaps.
<b>Care, Learning and Play</b>	Describes the expected caregivers’ behaviour toward the children and provides guidelines for the programme of activities. This standard also lists the developmental milestones for children of different age groups.
<b>Working in Partnership with Parents</b>	Lists the measures and guidelines that should be adopted by carers to keep parents involved and informed on their child’s development.
<b>Behaviour Management</b>	Presents the principles governing behaviour management. It also specifies the type of disciplinary action that is acceptable or prohibited.
<b>Child Protection</b>	Specifies the measures that a child care facility should take to protect and care for each child during their period of attendance at the centre. It also outlines the measures that should be taken when a child’s safety is at risk. This section also refers to the treatment of confidential data and the adoption of a ‘whistle-blower’ policy.
<b>Food and Drink</b>	Emphasises the importance of a healthy diet, flexible meal times, proper food handling and giving due attention to special dietary requirements of children.
<b>Equal Opportunities and Children with Special Needs</b>	Highlights the promotion of values and principles for equal opportunities. It states that children should be valued as individuals and helped to achieve their full potential through inclusion, universal accessibility and participation in various activities. The standards also specify that activities should reflect non-stereotypical roles and diversity of race, culture and religion.

Source: National Standards for Child Day Care Facilities, Ministry for the Family and Social Solidarity & Ministry of Education, Youth and Employment (2006)

Furthermore, a suitable programme can prevent lower productivity, possible negligence and disruptions during work. The provision for child care support also allows parents/guardians to be more flexible on-the-job. In addition, child care arrangements can be used to retain key public employees, to attract suitable recruits, as well as to generate a “family support” image of the public sector in the community.

(b) In parallel, child care facilities benefit children from an educational and social perspective, by boosting their learning and giving them the chance to mix with others from a wide variety of backgrounds. Such facilities can provide an environment that is healthy and stimulating for children, including giving them a sense of inclusion and safety.

1.3.2 The importance of child care arrangements has been documented in various national studies and policy

**Table 1.3 New registrations of child care centres**

Year	New registrations <sup>1</sup>	Localities of new registrations <sup>2</sup>
<b>From March 2007</b>	<b>30</b>	Attard, Balzan, Birgu, Birkirkara, Burmarrad, Fgura, Hal-Far, Hamrun, Kappara, Mgarr, Żebbiegh, Marsascala, Mellieħa, Mosta, Naxxar, Pembroke, San Ġwann, Santa Venera, Sliema, St. Julians, Tarxien, Żebbuġ, Żejtun and Żurrieq
<b>2008</b>	<b>9</b>	Attard, Birkirkara, Gżira, Gharghur, Luqa, Paola, Qawra and San Ġwann
<b>2009</b>	<b>9</b>	Birkirkara, Gżira, Hamrun, Luqa, Msida, Paola, Swieqi, Xemxija and Żurrieq
<b>Up to May 2010</b>	<b>3</b>	Cospicua, Pembroke and Siggiewi

<sup>1</sup> These figures only show the number of new registrations recorded by DSWS on an annual basis and do not necessarily represent the total number of centres that were registered in a given year. Registrations by DSWS are provisional and have to be renewed on expiry (normally after a year).  
<sup>2</sup> There are no registered child care centres in Gozo.

Source: Department for Social Welfare Standards (2010)

papers on child care provision as well as in an internal study on the significance of child care arrangements for public employees compiled by the Management Efficiency Unit (MEU). The main conclusions and recommendations of these reports are outlined in Table 1.4.

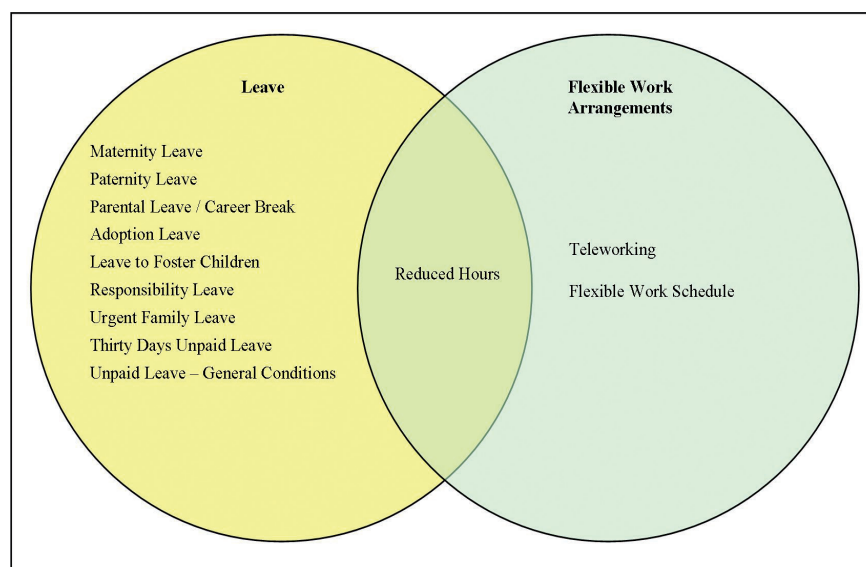
### 1.4 Alternative options for child care at the workplace

1.4.1 Different solutions for the provision of child care arrangements have been implemented by a number of

organisations across the public sector for their employees. These have included:

- (a) The full development of an in-house facility run by the organisation itself with dedicated premises, as well as permanent child care management and staff.
- (b) The outsourcing of child care services to an external provider, with the provision of suitable premises being possibly included as part of the contract of service.

**Figure 1.1 Family-friendly measures supporting public service employees with children**



Source: Management and Personnel Office, Office of the Prime Minister (2009)

**Table 1.4** Earlier studies and reports on the provision of child care

Reports	Main conclusions and recommendations
<p><b><i>Il-Qasam tal-Kura u ż-Żamma tat-tfal f'Pajjiżna</i></b> Child Care Task Force, The Co-operatives Board, Ministry for Social Policy, 2001</p>	<p>This published report presented the main conclusions and recommendations of the <i>Child Care Task Force</i>.</p> <p>The report outlined the options available to parents for the care of children in Malta. It also highlighted child care practices being applied in other countries, including the use of co-operatives for the provision of these services. Moreover, the document included a review of the different levels of competences and qualifications required for babysitting, child minding and child care. The type of training offered was also discussed.</p> <p>The report identified the need for more information and research on child care in Malta. It also highlighted the need to develop and strengthen the national arrangements for child care services as well as to promote, regulate and facilitate access.</p>
<p><b><i>Early Childhood Development and Care – Consultation Document</i></b> Ministry for Education, Youth and Employment &amp; Ministry for the Family and Social Solidarity, 2004</p>	<p>This draft policy document emphasised the importance of early childhood education and care and outlined the parameters for a regulatory framework to ensure high quality services. It listed key principles and standards and highlighted a number of issues that needed to be taken into consideration by the various stakeholders.</p> <p>The document was part of a consultation process launched by Government to synchronise common policy and regulation as well as to promote good quality day services for children. This process led to the development of the National Standards for Child Day Care Facilities that were published in 2006.</p>
<p><b><i>Family-friendly Measures in the Public Sector</i></b> Management Efficiency Unit, 2005</p>	<p>This document (intended for internal circulation) consisted of three volumes covering the different phases of a research project commissioned to the Management Efficiency Unit by the Prime Minister's Private Secretariat and undertaken during 2004 and 2005. It included:</p> <ul style="list-style-type: none"> <li>(a) A review of the EU policies on family-friendly measures.</li> <li>(b) Research on the level of implementation of such measures in different European countries.</li> <li>(c) A situation audit of the family-friendly measures available to employees within the Maltese public sector.</li> <li>(d) A list of family-friendly policies that could be introduced for public employees, including an assessment of the potential costs, benefits and overall impact of each identified measure.</li> <li>(e) Specific reference to possible child care solutions, including the provision of in-house facilities at subsidised rates or the offering of financial support to those employees using external child care services.</li> </ul>
<p><b><i>Early Childhood Education and Care – A National Policy</i></b> Ministry of Education, Youth and Employment, 2006</p>	<p>This publication was presented to the Minister responsible for Education, Youth and Employment in 2006 by the Early Childhood Education and Care Working Group following a review of the situation and relative policies and services in the field of early childhood education. The document examined the international and local context and proposed a series of recommendations to address crucial issues in the immediate, short and long term.</p> <p>More specifically, the report evaluated demographic trends; labour market, employment and gender issues; the changing family size and structure; the provision and availability of early childhood facilities in Malta; available curricula and learning programmes; staffing and other resource requirements and constraints; financing issues; parental involvement; and mechanisms for evaluation and monitoring.</p>

**Table 1.4 (continued) Earlier studies and reports on the provision of child care**

Reports	Main conclusions and recommendations
<p><i>Supplementary Planning Policy Guidance – Child Day Care Facilities</i> Malta Environment and Planning Authority 2006</p>	<p>This policy document (listed on the website of the Malta Environment and Planning Authority as being approved by the Authority but still subject to Ministerial approval) sets out the land use planning policy framework for assessing development applications for child day care facilities.</p> <p>The Authority acknowledged that such facilities were becoming an increasingly important pillar of community care and welfare services supporting Maltese families and children. The document also stated that it was desirable for working parents to have easy access to child care centres close to their place of work.</p> <p>The emphasis of the guidelines were to ensure that:</p> <ul style="list-style-type: none"> <li>(a) The development of child care facilities are sited in the right locations and in suitable buildings.</li> <li>(b) The needs of users are met.</li> <li>(c) The scale of development is appropriate.</li> <li>(d) The amenity and character of the surrounding location are safeguarded.</li> </ul> <p>This publication was considered timely and essential as the development of early childhood facilities in the community and at the workplace needed to be encouraged. Moreover, the policy was also deemed necessary for the efficient use of land and buildings.</p>
<p><i>Quality Childcare Information Campaign</i> Employment and Training Corporation, 2007</p>	<p>This internal working document, commissioned by the Employment and Training Corporation as part of a Child Care Campaign financed through the European Social Fund, summarised the results of research carried out between 2006 and 2007 on various issues including the general public's perceptions on child care services, knowledge of such assistance, and usage of these services.</p>
<p><i>Malta's National Reform Programme 2008-2010</i> Ministry of Finance, the Economy and Investment &amp; the Management Efficiency Unit, Office of the Prime Minister, 2008</p>	<p>The National Reform Programme 2008-2010 highlighted, amongst others, the Government's achievements, priorities and the measures to be introduced in relation to child care.</p> <p>These included a tax rebate on child care (as part of Measure 3.3); the launch of a campaign promoting the benefits of quality child care and the implementation of a training programme for child carers at the workplace (through the European Social Fund); as well as the utilisation of school structures for after-school child care.</p> <p>Earlier related versions of the Reform Programme, namely the National Reform Programme 2005-2008 and the National Action Plan on Employment of 2004 also listed measures related to encourage the development of child care facilities in order to assist women to take a more active role in the workplace.</p>
<p><i>Malta's National Reform Programme 2008-2010, Progress Report 2009</i> Ministry of Finance, the Economy and Investment, 2009</p>	<p>The Progress Report on the National Reform Programme 2008-2010 reported on developments of the various measures and addressed the European Commission's recommendations.</p> <p>The document highlighted the efforts being made to facilitate child care and to increase the number of such facilities. Reference was also made to Malta's challenge to reach, by 2010, the Barcelona target of providing child care to thirty-three per cent of children below the age of three.</p>

Source: NAO Working Papers (2010)



- (c) A more straightforward procedure of simply reimbursing part of the fees incurred by staff for child care arrangements during work hours.

1.4.2 Such initiatives were driven by the specific priorities, requirements, opportunities and constraints of the respective organisations. In all the cases, human resource concerns, top management commitment, the availability of sufficient funds and access to suitable facilities were key underlying factors that led to the development of child care arrangements.

## 1.5 Objectives and scope of the study

1.5.1 NAO undertook a performance audit to evaluate the introduction and management of these child care arrangements. The main objectives of the audit were to:

- (a) Carry out a cross-comparative assessment of how child care arrangements were introduced over the years for public employees and what led to the development of these individual initiatives.
- (b) Determine what systems and resources were required for the operation or outsourcing of child care services, as well as for the provision of financial support to employees paying for child care services.
- (c) Evaluate the respective benefits and opportunities derived from the application of different child care solutions as well as the challenges and risks faced by organisations providing these arrangements for their employees.

1.5.2 The study focused on management and value-for-money issues and did not assess the level of abidance with the National Standards. In addition, the provision of child care services to the wider community or by the private sector was outside the scope of the examination carried out by NAO.

1.5.3 To achieve the established objectives, NAO examined:

- (a) The in-house child care facilities for public employees in four Government organisations. These facilities are at the Employment and Training Corporation (ETC), at the Mater Dei Hospital (MDH), at the University of Malta (UOM) and at the Water Services Corporation (WSC).
- (b) The outsourcing of child care services for employees at Zammit Clapp Hospital / Rehabilitation Hospital, Karin Grech (ZCH/KGH).

- (c) The financial support offered at the Malta Information Technology Agency (MITA) to subsidise child care costs of employees was evaluated as an alternative arrangement to the direct provision of child care services.

1.5.4 In parallel, the study included in-depth interviews with DSWS to obtain a comprehensive understanding of the applicable standards and the registration process of child care facilities.

1.5.5 Details on the methods applied to the study are outlined in Appendix A.

1.5.6 Unless otherwise stated, the findings in this report reflect conditions up to the end of February 2010.

1.5.7 NAO would like to thank all the participating organisations for their collaboration during the performance audit.

## 1.6 Structure of the report

1.6.1 The rest of this report is structured as follows:

- **Chapter 2 – Evaluation and introduction of the initiatives:** This chapter evaluates the factors that led to the introduction of different child care arrangements for public employees. It also examines what options were considered and how these were assessed. In addition, the chapter focuses on the role played by senior management when selecting the preferred arrangements and on what critical challenges had to be overcome. The chapter also describes the type of child care that is offered and provides details on the number and ages of the children that are benefiting from these initiatives.
- **Chapter 3 – Resources and organisation:** This chapter examines the costs being incurred by the six case study organisations to implement child care arrangements for their employees. It also assesses the physical and human resources that have been required to provide full-scale in-house child care services in four of these organisations, as well as what systems and procedures are in place to ensure effective administration and management.





## Chapter 2

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### Evaluation and introduction of the initiatives

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## Chapter 2 – Evaluation and introduction of the initiatives

*Chapter 2 assesses the factors that led to the introduction of different child care arrangements for public employees and examines the options that were evaluated. It also discusses the challenges that were faced when deciding on what to provide. Moreover, this chapter describes the services offered, the degree of take-up of such arrangements, as well as the extent to which the organisations are financially supporting their employees with respect to child care.*

### 2.1 Considering child care as one of the measures for a supportive work environment

2.1.1 A primary concern for both employers and employees is the effective facilitation and reconciliation of work-life priorities.

2.1.2 Employees require flexibility to cope with the several demands of work, family life and personal life. A clear link exists between, on the one hand, the initiatives that can be taken by employers to provide a supportive work environment and, on the other hand, the measures that employers can introduce to improve efficiency and effectiveness at the workplace. The latter can include steps to increase productivity; enhance staff morale; increase the commitment and loyalty of the workforce; improve the retention rate of key categories of employees; attract the best talent; and reduce absenteeism due to sickness or stress. A strategic approach to identifying the need for child care and other family-friendly measures is, therefore, essential.

2.1.3 Figure 2.1 outlines the staggered introduction of these initiatives between 1991 and 2007 by the six public sector organisations that participated in this study. These measures were intended for employees with children who were not old enough to go to school and, in certain cases, also for children in between schooling periods.

2.1.4 In all six case studies, the development of child care arrangements was part of an overall management drive and culture to improve work conditions. Moreover, these initiatives were aimed at providing a more supportive work environment that encourages a healthy work-life balance and equal opportunities.

2.1.5 In addition, MITA and ZCH indicated that child care arrangements were specifically introduced to retain key employees and/or to attract new staff with the required qualifications, technical skills and competences. This aspect was also taken into consideration by WSC. In 2005, the Corporation's internal 'Committee for the Equality between Men and Women' found, through a staff survey, that a significant number of employees would be attracted to return to work earlier or remain with the organisation if child care was provided at the workplace.

2.1.6 Staff and trade union pressure can also be an important factor. In 2007, during migration to MDH from St. Luke's Hospital (SLH), the Malta Union of Midwives and Nurses (MUMN) bound the Health Authorities to give priority to the provision of in-house child care services within the premises of MDH or in a nearby location. The service was already being offered to the staff working at SLH and MUMN took steps to ensure that this benefit would be retained and provided in a location close to work.

**Figure 2.1 Introduction of child care arrangements in the case study organisations**

1991	Child care centre operated by employees opens at Zammit Clapp Hospital to primarily retain critical staff. Today, the arrangement is outsourced and staff have migrated to the Rehabilitation Hospital Karin Grech.	2002	MITA starts to offer a reimbursement scheme to partly cover employees' expenses for child care. The Agency particularly exploited this benefit to retain and attract staff with skills in high demand.	2007	The Water Services Corporation opens an in-house child care centre for employees to improve work conditions and promote equality.
1990	2000				2010
	1993		2004		2007
	The University of Malta introduces an on-site child care centre to make it easier for staff and students to work or study on campus.		The Employment and Training Corporation launches an on-site child care centre in response to staff requests and to implement national employment policies. The arrangement was tested between 2001 and 2004.		Mater De Hospital opens an in-house child care centre for staff in a nearby location following migration from St. Luke's Hospital. The service is a continuation of the one that was offered in the former hospital.
* Information about other child care facilities operated by Government is outlined in Table 1.1					

Source: NAO Working Papers (2010)

## 2.2 Evaluating the viability of child care solutions

### *Interest of employees*

**2.2.1** Before embarking on a child care initiative, some form of evaluation needs to be carried out in order to assess, as far as possible, the current number of employees with young families as well as the proportion of staff who could potentially benefit from the initiative in the foreseeable future.

**2.2.2** All the six case studies reported that they had a sufficient number of staff with young children at the time when they were considering introducing child care at the workplace. For example, when MITA was evaluating child care options in 2000, the Agency estimated that there were thirty-five children of employees who were aged up to five years and could therefore be covered by the proposed initiative. In addition, MITA's management concluded that the young profile of the workforce was expected to further increase potential demand for the scheme.

**2.2.3** However, from the interviews held with the participating organisations, it emerged that it is difficult to accurately and reliably estimate take-up of these arrangements in the medium- and long-term as parents might change their intentions or their circumstances might alter. As a consequence, significantly fewer or

more employees than expected could end up requiring the services.

**2.2.4** For example, WSC had initially envisaged that the child care centre would cater for eleven to twelve children. In practice, however, there were significantly fewer registrations when the service was launched, although the numbers increased in subsequent years.

**2.2.5** Experience has shown that substantial investments made in in-house facilities to secure suitable premises, equipment and specialised human resources might backfire if expected take-up by employees never materialises or dwindles over the years.

**2.2.6** It is also clearly evident from the examined cases that, before offering child care benefits, employers need to seek direct feedback from employees on their needs, preferences and expectations concerning the proposed arrangements. Employees are influenced by various dynamic forces when deciding what suits them best. These include their values, culture, perceptions, the level of support from relatives as well as the economic well-being of their families (Table 2.1). It is therefore important that employers sufficiently consult on and discuss these issues with their staff before making any significant commitments.

**2.2.7** Steps were taken by most of the interviewed organisations to gather information directly from employees, especially in those cases where projects required significant investment in in-house child care

**Table 2.1 Alternative arrangements to in-house child care services offered by employers**

<p><i>Employers should cautiously evaluate the potential take-up of in-house child care services as parents may ultimately prefer alternative arrangements in order to reassure themselves that the appropriate and full care is given to their children. There is no simplistic solution to all of this as employees with young children may opt for one or a combination of the following arrangements instead of in-house child care services offered by the employer.</i></p>	
 <p>Parent stays home with child</p>	<p><b>An employee prefers to temporarily stay at home to take care of a child, opting instead for other available family friendly measures such as parental leave and/or a career break. The parent may also choose to terminate employment permanently to raise the family.</b></p> <p>Studies have shown that in Malta there are persistent strong views on traditional motherhood (ETC, 2007), including the belief that if a woman with pre-school children works, the latter are likely to suffer and their welfare is ‘neglected’ (Abela, 2000). Traditionally, the Maltese society tends to place responsibility for family well-being on mothers. Females with very young children who take up or remain in paid employment after childbirth might feel guilty or be blamed if anything goes wrong in their absence (Naudi, 2005). As a result, it is still customary in Malta for children under three to be brought up at home by the mother.</p>
 <p>Child is left with relatives</p>	<p><b>An employee chooses to leave his/her child with relatives (in many cases grandparents).</b></p> <p>Many Maltese have strong family ties and as a result a significant number of employees may prefer to leave their young children with grandparents or close relatives rather than with staff in a child care facility.</p> <p>In fact, a survey commissioned by the Employment and Training Corporation in 2007 showed that a significant proportion of Maltese prefer to leave children with grandparents instead of using professional child care. Similarly, survey results published by the National Statistics Office between 2006 and 2007 showed that a considerable majority of parents prefer leaving their children with grandparents while they are at work.</p> <p>It is also important to note that, with most relatives in Malta living within short distance from each other, parents find it comparatively easy to leave children with grandparents or other relatives and collecting them on their way home after work.</p> <p>Nevertheless, making arrangements with grandparents may not always be possible as they could still be working themselves; are too old to care for grandchildren; or are unwilling to take on such a commitment.</p>
 <p>Child is sent to another facility or is cared for by a nanny / child minder</p>	<p><b>An employee decides to send the child to another day care centre or a kindergarten instead of using the in-house services offered at work. The employee can also choose to hire a nanny/ child minder to take care of the child at home.</b></p> <p>Consideration should also be given to employees who prefer sending their children to a day care facility that they are familiar with or that has been recommended to them, instead of using in-house services. Furthermore, from the age of three, parents can also send their children to a kindergarten run by the State, the Church or by a private institution.</p> <p>Evidence from the case studies shows that it can take time before newly-fledged child care services at the workplace gain the confidence and trust of employees. Parents are influenced by various issues such as:</p> <ul style="list-style-type: none"> <li>• Hours when the service is offered (in particular for those employees starting work early or finishing late).</li> <li>• The proximity of the facility to the place of work thus allowing the parent easy access during the day.</li> <li>• Affordability.</li> <li>• The reputation of a centre for delivering a high quality service as well as the attractiveness of the child care environment (including premises and the quality of indoor and outdoor equipment).</li> <li>• Carers are professional and experienced and there is a sufficient number to take care of the children.</li> <li>• Whether the centre is regularly monitored for standards as well as whether it is safe and clean.</li> <li>• The type of programme offered, including the type of learning/educational experiences.</li> </ul>

Source: NAO Working Papers (2010)

facilities. The following are case examples of the different methods used to collect feedback before embarking on a child care initiative:

- (a) **Staff surveys:** UOM and WSC used self-administered questionnaires to measure and understand the level of parental demand for child care before launching their initiatives. WSC's questionnaire included comprehensive questions on the parents' needs, preferences and expectations concerning the proposed arrangements (Table 2.2). UOM's survey was more basic in its approach and was limited to asking interested parents information on when and how often they would use the service as well as the ages of the children they intended to register with the centre.
- (b) **Formal and informal discussions with interested or potential employees:** In order to identify child care needs and expectations, ETC actively engaged interested parents through a series of meetings and by exchanging electronic mail communications on various issues. The Corporation also directly involved parents in the decision-making process. Another case study (ZCH), held discussions with


staff to persuade female employees who were considering staying at home to care for their children to return to work earlier and use the hospital's in-house child care services. This was essential as the culture of leaving infants and toddlers in a child care centre was less prevalent when the service was introduced in 1991.

- (c) **Union representation:** In the case of MDH, the level interest and the preferences of employees with regard to in-house child care services at the new hospital were discussed with the union representatives of the nursing staff (MUMN).

### *Involvement of different players in the initial evaluation process*

2.2.8 The internal functions responsible for corporate services (including human resources and financial management), working in consultation with senior management, were usually the most involved in the collection of information and the preliminary evaluation of the proposed child care initiative. These officials were responsible for identifying and assessing, amongst others:

**Table 2.2 Undertaking a survey to evaluate parents' needs, preferences and expectations**

	<p>In a survey carried out among employees of Water Services Corporation in 2005 by the internal 'Committee for the Equality between Men and Women', a range of questions were asked to employees on various issues, such as:</p> <ul style="list-style-type: none"> <li>• How employees were addressing their child care needs during working hours and what they were paying for these arrangements.</li> <li>• Whether they were interested in using such services if offered in-house by the employer and what they were prepared to pay for the service.</li> <li>• Details of when and how often they would use the service and the ages of their children.</li> </ul>
<p>Forty-six interested individuals out of a workforce of over 1,500 employees completed the questionnaire. The respondents were mostly staff from the Corporation's Head Office in Luqa where the child care facility was planned to be located. Nineteen of the respondents were males.</p> <p>The majority of those who participated in the survey indicated that they were leaving children with family. A lesser number responded that they sent their children to a nursery or were keeping their child with a nanny/child minder. All respondents expressed their interest to use in-house child care service if these were suitable and of good quality. They also gave their views on how much they were willing to pay for such services.</p> <p>Moreover, several respondents indicated that knowing that their employer provided child care at the workplace would encourage them to remain in their job and to return to work earlier after having children.</p>	

Source: Water Services Corporation (2010)

- The type of child care required.
- The potential level of take-up.
- The options available to the organisation.
- What fees could be charged.
- What resources were required for running the operation in terms of management, premises, equipment, human resources and funds.

2.2.9 At UOM, the institution, in 1991, formed a ‘planning group’ for this purpose. The group was chaired by the Rector and made up of another five members, drawing upon the available expertise from the academia (including education and architecture) and also involving support staff as well as an employee who was also an interested parent. In 1997, the University also undertook an in-depth assessment of existing structures, services and arrangements in order determine a better set-up and a more cost-effective operation. This involved the establishment of an internal independent sub-committee of the University Council made up of three members as well as meetings with various stakeholders.


2.2.10 In the case of MDH, the situation was different as the evaluation process of identifying and assessing different options and requirements encompassed a broader range of stakeholders. These included internal units (in particular, the procurement, finance and human resource functions as well as the nursery staff), the Foundation for Medical Services (FMS), together with the Ministries involved in the hospital migration process.

2.2.11 It has also been noted that, over the years, access to external expertise during the evaluation of requirements has improved. The case studies that were the first to adopt child care arrangements had few models (within the local context and from the public sector) on which to draw upon and use as points of reference when assessing feasibility and deciding on the optimal arrangements.

2.2.12 However, with the introduction, several years ago, of assessment services by DSWS to evaluate requirements for child care, increased guidance has been available to those organisations intending to open a child care centre. As can be noted from Table 2.3, this development had a positive impact on all the case studies with in-house child care services.

2.2.13 The concept of child care has also evolved considerably over the past twenty years, in particular with the establishment of standards and criteria related to the provision of child care. Today, the feasibility of an in-house facility needs to be more carefully assessed due to the considerable requirements set out in legislation, National Standards for Child Day Care Facilities (2006) and by various authorities. The latter include DSWS, the Malta Environment and Planning Authority (MEPA), the Malta Qualifications Council (MQC), the National Commission Persons with Disability (KNPD), the Department for Environmental Health (DEH) as well as independent health and safety auditors.

**Table 2.3 Using the advisory services offered by DSWS to evaluate requirements**

<ul style="list-style-type: none"> <li>• In 2005, ETC invited DSWS to provide the organisation with advice and guidance on how to develop the pilot child care centre. These included:             <ul style="list-style-type: none"> <li>- How to maintain and improve premises and equipment</li> <li>- Staffing requirements</li> <li>- Required policies and procedures</li> <li>- Health and safety requirements</li> <li>- Child protection provisions</li> <li>- Management and monitoring issues</li> </ul> </li> <li>• Similarly, between 2005 and 2007, WSC involved DSWS to better understand what was required to have a high quality in-house child care service in place.</li> <li>• In 2007, before migration to the new hospital, MDH also asked DSWS to view the temporary premises that the hospital was intending to lease for its child care operation in order to evaluate what investment and improvements were needed to be done to have a suitable facility.</li> <li>• In 2009, UOM requested a review by DSWS of its child care facility. The exercise covered the various aspects included in the National Standards and proposed recommendations on how the operation and procedures could be improved.</li> </ul>	
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Source: NAO Working Papers (2010)



2.2.14 The various conditions set out by these bodies, some of which require time-consuming, complex and lengthy procedures, as well as considerable investment in the appropriate provisions, can as a consequence reduce the practicality and feasibility of developing in-house facilities.

### *Rationale adopted for selecting the measure*

2.2.15 All six case studies reported that there were valid justifications for undertaking the chosen measure.

- (a) At ETC, UOM, WSC and ZCH, the decisions to offer child care arrangements were based on two main factors, namely:
  - (i) The interest shown by staff at that time to use such services.
  - (ii) The willingness of senior management to invest and allocate sufficient resources for the development of initiatives that promoted a healthy work-life balance and improved work conditions.
- (b) In addition, at MITA, the launch of the child care measure was further justified as the Agency was simultaneously taking key strategic decisions at senior management level on what additional incentives it could introduce to retain and attract staff with key competences and skills. Child care was considered by MITA as another benefit that could be offered across the organisation as part of its agenda to improve work conditions for employees.
- (c) At ZCH, the introduction of child care was also seen as a means of encouraging female employees with young children to return to work earlier and make use of in-house child care facilities.
- (d) In the case of MDH, the situation was more complex as the in-house child care service was already being offered free of charge for nearly a

decade at SLH and employees expected that the benefit would be retained at the new hospital under the same conditions. This was a dominating factor and overshadowed any other consideration.

### *Current child care arrangements*

2.2.16 Table 2.4 on the following pages provides a detailed outline of the child care solutions that were being provided by the six case studies during January 2010. The Table highlights the similarities and differences in the offered arrangements with respect to capacity, eligibility, the hours and periods of operation, the services offered, take-up levels, the frequency of usage by the employees, as well as the fees being charged to the users.

### *Issues related to the selected options*



2.2.17 Five of the six case studies initially opted for an in-house child care centre. This arrangement was considered to be the most suitable for the needs of the respective organisations at that time. The entities were not deterred by the various challenges and risks of their respective undertaking (Table 2.5). In the case of ETC, the Corporation also addressed these issues by gradually introducing the initiative and progressively extending the services from an initial ‘Summer Entertainment Zone’ for school children during school holidays to the whole scale roll-out of a child care centre in 2004.

2.2.18 The only case study organisation to immediately opt for an alternative solution instead of an in-house child care service was MITA. In its assessment, the Agency looked at three options, namely the:

- Establishment of an in-house facility.
- Outsourcing of the service to third parties using the latter’s facilities.
- Provision of a fixed allowance to employees using such services.


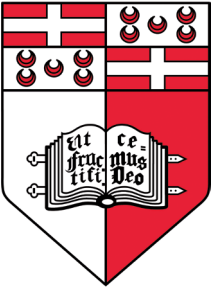
For various reasons (in particular the lack of space at the workplace and the cost involved in setting up and operating an in-house centre), MITA decided to restrict the initiative to only offering a reimbursement scheme to those employees using child care services of their choice during work hours.

**Table 2.4 Arrangements available to employees of case study organisations  
(as at January 2010)**

Organisation	Description of the offered child care arrangements
 <p><b>ETC</b> Employment and Training Corporation</p>	<p>‘Il-Passju’ is open from Monday to Friday from 07.30 to 16.30 (during winter) or till 14.00 (in summer) for children aged between three and thirty-six months. Employees had seven children registered with the child care centre located on ETC’s premises:</p> <ul style="list-style-type: none"> <li>• Two children were aged twelve months or less.</li> <li>• One was aged between thirteen and twenty-four months.</li> <li>• The remaining four were aged between twenty-five and thirty-six months.</li> </ul> <p>Three of these seven children attended the centre on a daily basis. The remaining four were using these services twice or three times a week.</p> <p>In addition, the centre offers to employees the opportunity to care for children aged between three to twelve years after school hours and during school holidays. There is strong interest from several parents to use these child care services during school holidays. However, during January 2010, no parents opted to use the centre for their children after school hours.</p> <p>At the beginning of 2010, ‘Il-Passju’ also had the capacity to cater for young children from the wider community and there were four toddlers attending this centre.</p> <p>ETC has different charges for child care services, offering subsidised rates for employees and discounted fees for those using the service more frequently. The annual registration fee for employees is €46.59. The cheapest hourly rate is €0.40 for booking the service in advance on a daily basis for a whole year. Employees opting for this package were expected to pay €885.16 each year for every child. The most expensive option for employees was payment on demand, with the rate being €6.99 for a whole day. These fees are intended to recover part of the child care costs.</p>
 <p><b>MATER DEI</b> Hospital</p>	<p>The Hospital’s child care facility caters primarily for the children of employees of MDH. These arrangements are also being extended to employees working at MDH but employed by Mount Carmel Hospital or the Foundation for Medical Services.</p> <p>The child care centre is currently located at temporary premises close to the Hospital and is open from Monday to Saturday between 06.45 and 17.30, excluding public holidays. Registration is restricted to children aged between eleven and thirty-six months. Furthermore, employees can only use the centre during the hours that they are at work.</p> <p>In January 2010, the centre was operating at full capacity with fifty-five children of employees attending at different times and days of the week.</p> <p>The majority of these children (thirty-five) were attending the centre between four and six times a week, whilst the remaining twenty were registered for twice or three times weekly.</p> <p>Employees were mostly using the Hospital’s child care services for approximately six to nine hours each day that their child/children attended.</p> <p>The ages of the registered children fell in the following age brackets:</p> <ul style="list-style-type: none"> <li>- Between eleven and twelve months: one child.</li> <li>- Between thirteen and twenty-four months: twenty-nine children.</li> <li>- Between twenty-five and thirty-six months: twenty-five children.</li> </ul> <p>MDH offers this service free of charge in line with the agreement that Government has with the Malta Union of Midwives and Nurses (MUMN). No fees are charged to parents to recover part of the child care costs. However, parents are encouraged to donate €5 each month to fund the purchase of crafts and the organisation of activities.</p>

Source: NAO Working Papers (2010)

**Table 2.4 (continued) Arrangements available to employees of case study organisations (as at January 2010)**

Organisation	Description of the offered child care arrangements
 <p><b>Malta Information Technology Agency</b></p>	<p>MITA offers employees the possibility of claiming €0.82 for every hour that their child, up to the age of five, spends at a registered child care centre or at a private school while they are at work.</p> <p>This benefit is available to employees working full-time or on reduced hours and who are not on unpaid leave, as well as to teleworkers during the time they are at the office.</p> <p>Claims are to be accompanied by the relevant receipts and MITA reimburses employees through the monthly payroll system.</p> <p>During January 2010, the parents of ten children of different ages were benefiting from this arrangement.</p>
 <p><b>University of Malta</b></p>	<p>‘It-Tajra’ operates over three terms from the first week of October to the last week of June from Monday to Friday between 07.45 and 17.15. It does not open during public holidays or during Christmas and Easter breaks. The centre is located on the University campus and registration is restricted to children aged between twenty-four and forty-seven months in October of each year.</p> <p>In summer, ‘It-Tajra’ does not open and the existing facilities are instead used for the ‘Kids on Campus’ programme which targets children aged between three years and less than twelve years.</p> <p>The University’s child care centre is open to employees, students and the general public. However, priority is given to employees and students and criteria have been established on how applications are ranked. In October 2009, the centre was operating at full capacity and records show that there were at least seven children of employees on the child care centre’s waiting list at the start of the academic year.</p> <p>In January 2010, there were thirty-six children registered with the University’s child care centre and thirty of these were of employees. Children were mostly attending during the morning, with a number also staying on for additional time in the afternoon on certain days.</p> <p>The ages of the employees’ children attending this facility varied between:</p> <ul style="list-style-type: none"> <li>• Twenty-four and thirty-six months: eleven children</li> <li>• Thirty-seven and fifty-six months: seventeen children</li> </ul> <p>The University charges a one-time non-refundable registration fee of €30 to all applicants, whether they are accepted or not. The fee for the daily use of the child care services, between 07.45 and 13.30, is €350 each term. Additional rates are charged for parents opting to extend their use of the services to the rest of the afternoon (€200 for every term or €1 for every thirty minutes). Those employees who opt to use only the afternoon sessions pay €250 each term or €1.20 every thirty minutes. These rates are intended to recover part of the child care costs.</p>






Source: NAO Working Papers (2010)

**Table 2.4 (continued) Arrangements available to employees of case study organisations (as at January 2010)**

Organisation	Description of the offered child care arrangements
 <p><b>Water Services Corporation</b></p>	<p>The centre, located on WSC’s grounds, is open from Monday to Friday from 07.30 to 16.45 during the Corporation’s official winter office hours and up to 13.30 during the summer period. The child care services of ‘Nemo’ are available only for children of WSC employees. Attendance is further restricted to children aged between twelve and thirty-six months.</p> <p>During January 2010, six children, aged between twenty-five and thirty months, were registered with ‘Nemo’. The services were mainly being used only during the first half of the day, with five of the six children being collected by their parents between 12.30 and 13.00. Only one child remained at the centre till 14.30. Furthermore, none of the parents used ‘Nemo’ on a daily basis. Two children were attending four times a week, three were attending twice or three times a week, and a child was using the centre only once a week.</p> <p>The centre had ample capacity to cater for more children throughout the day. The busiest days were Monday and Wednesday mornings when four children were being cared for.</p> <p>No registration fee is charged and all participating WSC employees were opting to pay an hourly rate of €1.40 for using the in-house child care service. The Corporation also offered parents the possibility of paying €163 per month for full-day usage of the service. These rates are subsidised and intended to recover part of the child care costs incurred by WSC.</p>
 <p><b>The Rehabilitation Hospital, Karin Grech</b></p>	<p>The following child care arrangements are offered to employees with children aged between three months and twelve years. As at January 2010, eligible staff were located at both Zammit Clapp Hospital and at the Rehabilitation Hospital Karin Grech. During the year, patient services were being progressively transferred to the latter, with Zammit Clapp Hospital being gradually phased out.</p> <p>The employer responsible for both hospitals was offering considerably subsidised rates for using the services in one of the centres operated by a privately-run child care provider with which the Hospital Management Committee had an annual renewable agreement. Parents were eligible to use these services from Monday to Friday between 07.00 and 17.30 on the days they were at work, although services could also be offered outside these hours if required by the employer.</p> <p>At the start of each calendar year, the employer was booking, for an established overall basic fee, a specific number of placements. The employer explained that the sum agreed with the service provider was based on past usage patterns and on the number of employees who would have expressed to the hospital’s administration their intentions to make use of these services. Moreover, it was indicated that the rates that were being charged to ZCH/KGH had remained unchanged for the previous four years.</p> <p>The participating employees’ share of the fee (paid monthly in advance) was ten per cent of the estimated total fee to be charged for that month for the care of their respective child/children. This meant that employees were paying between €0.34 and €0.54 for each hour, depending on usage. In the case of holiday period bookings, the subsidised rate for parents was €0.12 per hour. NAO noted that with this form of arrangement, the employer was bearing most of the risk as the agreed overall sum with the service provider had to be paid, regardless whether take-up by parents ended up being as arranged for.</p> <p>At the start of 2010, the employer booked placements for four children aged between three months and five years as well as six children aged between six and twelve years. For this guaranteed arrangement, ZCH/KGH was charged €9,317 (including all taxes). The sum was paid in advance and any extra amounts that will be due during 2010 will be paid after each holiday period. During January 2010, three children aged between twenty-seven and forty months were benefiting from this arrangement and the organisation’s management indicated that the number was set to increase to six in June 2010. Several school-aged children of employees were also using these services during school holidays.</p>

Source: NAO Working Papers (2010)

**Table 2.5 Key issues linked to in-house facilities**

	The added responsibility, with all its implications, of taking care of the employees' young children and resolving new issues related to child care.
	The significant costs required to set up and operate the facilities as well as to keep these up to standard.
	The need to engage several child carers and a supervisor with the required qualifications and experience.
	The development of various processes, most of which were new to the organisations and required careful implementation. These included policies and procedures on admission; child protection; health and safety issues; hygiene; the organisation of activities; as well as child behaviour management.
	The increased administrative work linked related to the operation of the facility, such as the processing of child care fees; the procurement of equipment, works and services; and contract management issue.

Source: NAO Working Papers (2010)

**2.2.19** In the case of ZCH, in 2004, after more than a decade operating an in-house facility, the hospital management reviewed the operation. The hospital took this step as the lease of the property that the hospital was using for child care was about to expire and new national standards on child care requiring considerable investment were being introduced. As a consequence, management decided to change the arrangement by outsourcing the service to a nearby provider instead of continuing with an operation run by its staff. ZCH considered various options when reviewing its existing child care arrangements. These ranged from:

- Using the existing site or changing to better premises.
- The provision of the service by current employees or outsourced staff.
- The complete contracting out of the management and operation services (including premises and staff).

The last option was found to be significantly less costly than operating the service in-house. Moreover, the new arrangement was eventually found to be also suitable during the gradual migration of ZCH's services to KGH in recent years as the provider was able to offer child care from another location closer to KGH that was operated by the same service provider.

**2.2.20** MDH has also actively reviewed different options for the provision of child care in its search for suitable premises following migration from SLH. The main stumbling block has been the considerable investment

required. Efforts to use the services of nearby child care facilities were also futile. Since November 2007, the hospital's child care centre has been housed in a temporary site with a limited lease which is not likely to be renewed. In the meantime, a number of alternatives have been explored including constructing a new facility within the perimeter of the hospital or on nearby property owned by Government. MDH has also considered leasing or purchasing new premises in the surrounding area.

## 2.3 Conclusion

**2.3.1.** Child care arrangements for public employees do not necessarily have to be in the form of an in-house service. Some public sector organisations have adopted alternative arrangements that can be potentially more cost-effective, including the complete outsourcing of the service to an external provider near the workplace, or the reimbursement of child care costs incurred by employees during work hours at a centre of their choice.

**2.3.2.** Two of the cases examined in this study (MITA and ZCH) opted for solutions which were found to be better (on several fronts) than the provision of an in-house service, with MITA being the more effective in managing the costs and risks related to this measure. The common advantages of both alternative solutions were:

- (a) Significantly less investment was needed.

- (b) The arrangement could be operated at a lower cost.
- (c) The solution allowed the employer the flexibility to adjust, within a short period, the arrangements in place in order to respond to new developments and circumstances.
- (d) The employer faced less risks overall.
- (e) Less management time was required to administer the arrangement.
- (f) Employees were satisfied with the offered benefit.

2.3.3 Figure 2.2 outlines the key steps that an organisation can take when assessing and selecting the appropriate child care arrangement within the context of a holistically supportive work environment.

2.3.4 Child care arrangement can ultimately prove to be too expensive to maintain. Take-up can also be low and, as a consequence, the provision of child care would be unjustifiable in terms of costs incurred for every employee/child.

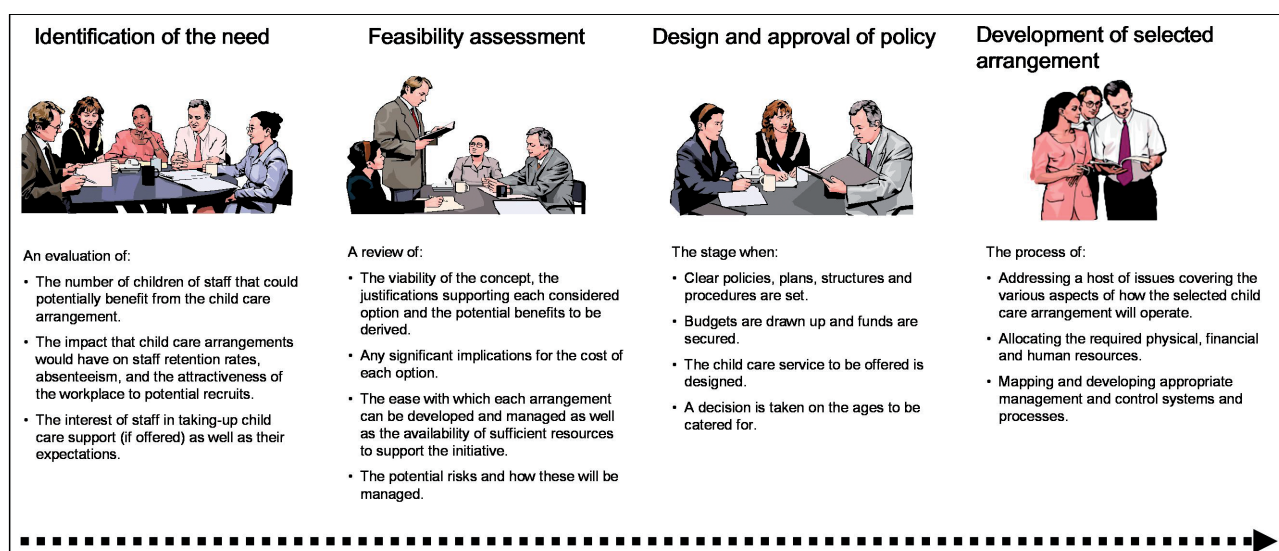
2.3.5 Before embarking on a child care initiative, it is therefore highly critical that, as far as possible, public sector employers:

- (a) Gather and assess reliable information on the interest of their employees to use such arrangements as well as on the nature and potential level of take-up. Experience has shown that many parents ultimately

- prefer other arrangements such as staying at home with the child or leaving the child with relatives, especially in the case of infants.
- (b) Comprehensively examine the feasibility and viability of each potential option, that is whether to offer in-house child care services, outsource or provide financial support to employees.
- (c) Determine the ease with which each alternative arrangement can be developed and managed together with the risks involved.
- (d) Thoroughly evaluate the justifications supporting each considered solution, the cost and resource implications as well as the potential benefits to be derived from each alternative measure.
- (e) Draw upon available internal and external expertise, including consultations with the competent authorities and familiarisation visits to other employers that have successfully established alternative arrangements.
- (f) Develop and establish clear policies, structures and systems to sustain the selected initiative and secure the required funds and resources.

2.3.6 The following chapter evaluates the resources and systems required to organise, manage and monitor the selected child care arrangement within the six case study organisations, including the challenges and lessons learned from implementing the selected measures.

**Figure 2.2 Key stages in the assessment of child care arrangements**



Source: NAO Working Papers (2010)



## Chapter 3

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### Resources and organisation

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## Chapter 3 – Resources and organisation

*This chapter examines the costs being incurred by the six case study organisations to implement child care arrangements for their employees. It also assesses the physical and human resources that have been required to provide full-scale in-house child care services in four of these organisations, as well as what systems and procedures are in place to ensure effective administration and management.*

### 3.1 The cost of providing child care benefits to employees

3.1.1 The introduction of child care at the workplace entails a range of new costs for the organisation, depending on the type of arrangement that is put in place. The delivery of in-house services requires considerable investment and relatively high operating costs. On the other hand,

alternative arrangements, such as offering staff an established allowance for child care or fully outsourcing the service to an external provider, can help to manage and cap expenditure related to this family-friendly measure.

3.1.2 These differences were clearly evident among the six organisations participating in this study. Table 3.1 illustrates the various types of capital and recurrent expenses that are typically incurred for the provision of in-house child care based on the four case studies with such arrangements. It also outlines the measures that were adopted these case studies to recover (through the collection of subsidised fees and/or from fund-raising activities) part of the costs of operation. In contrast, Table 3.2 outlines the much lesser amounts spent for each child that is cared for by the two case studies providing alternative arrangements to in-house services.

**Table 3.1 Examples of expenditure incurred for the provision of in-house child care services <sup>1</sup>**

**Acquisition or lease of site:** In three of the four cases, sites within the organisations' grounds were being used to adequately accommodate the required child care facilities. This was the case of ETC, UOM and WSC. Although no cost was incurred to purchase or lease property for these child care facilities, opportunities could have been lost to use such premises for some alternative purpose (opportunity cost).

In the case of MDH, since migration from SLH in November 2007, the hospital has leased nearby temporary premises at a cost (in 2010) of €18,000 per annum to house its child care services. As at April 2010, this arrangement was still in place as a permanent suitable location had still to be chosen and developed. This issue has been a recurring cause of concern to MDH as the area originally earmarked in the new hospital's designs as a child care facility was allocated for other purposes and MDH had insufficient funds to secure a permanent and suitable alternative site. An option considered between 2007 and 2009 was the purchase of nearby premises which was estimated to cost approximately between €500,000 and €800,000 to acquire prior to conversion to a child care facility. Significant costs were also required for structural alterations, refurbishment and other finishes.

<sup>1</sup> The figures included in this Table are indicative. Such detailed information was not always easily available and it was also difficult to accurately determine from the organisations' accounting records the full costs of each category/expenditure item. Some of these records dated back several years and data was not always allocated on a specific cost centre basis.



**Table 3.1 (continued) Examples of expenditure incurred for the provision of in-house child care services**

**Building, conversion or renovation:** All the four case studies incurred expenses related to the conversion and/or renovation of premises to house a child care facility, although none required constructing a new building. Apart from the initial start up costs, the organisations also incurred annual expenses to maintain and improve the facilities. Costs for these works varied depending on whether these were carried out by internal maintenance staff or through external service providers.

The following are examples of the type of expenses incurred to adapt and maintain in-house child care facilities:

- *Permit for the change use of property to a child care centre:* ETC, MDH and WSC reported that they applied for a permit from MEPA. These organisations incurred expenses in the form of architects' fees, MEPA fees, as well as the time expended to prepare the required application and obtain clearances from the relevant authorities.
- *Conversion / renovation works:* All four case studies indicated that they had to budget for additional funds to convert a selected area to a suitable and safe facility for child care services. However, required funding varied significantly among the case studies due to differences in both the size and type of required facilities. For example:
  - MDH, in 2008, estimated that the total costs of the project that was being considered for the conversion of an internal space into a centre catering for around fifty-five children would range between approximately €550,000 and €800,000, depending on the layout that would have been adopted for the facility.
  - Budgets from UOM, dating back to 1993, showed that the University required €54,000 at that time to convert a selected area within the University grounds into a child care centre.
  - WSC required considerably less funds as the Corporation already had a specifically designated indoor area for child care within the premises of the Institute of Water Technology and no major conversion works were needed. However, WSC does not have an appropriate outdoor play area although plans are at hand to address this shortcoming. Forwarded accounts show that WSC spent around €20,000 between 2006 and 2007 to convert the indoor area into the present facility.
  - ETC also did not initially require considerable funds to convert an area that was already being used for child care during school holidays to a full-scale centre that could cater for a small number of children throughout the whole year. ETC's financial records of that period indicate that the Corporation spent approximately €8,000 to make the place suitable particularly for children aged up to three years. Furthermore, in 2010 ETC was considering new installations and alterations to its existing internal facilities and equipment as well as improvements to the outdoor area. The Corporation was estimating that these improvements would cost approximately €26,500.
- The expenses of the four case studies for conversion or renovation works included structural and finishing expenses, the cost of engineering services, payments for external works as well as the purchase of required materials, furniture, fittings, supplies, child care equipment and goods. These were necessary for:
  - Conformance with 'Access for All Design Guidelines' and the National Standards for Child Day Care Facilities.
  - A separate entrance; a waiting/reception area; an unobstructed fire exit; as well as access control and/or security doors.
  - Making the indoor and outdoor play and activity areas safe and, if necessary, separated for younger and older age groups. Expenses included the purchase of safety flooring and wall covering; protection material for corners; fencing and protective barriers; lead free paint; safety glass; removal of (or covers for) power sockets; as well as child proof locks.

**Table 3.1 (continued) Examples of expenditure incurred for the provision of in-house child care services**

- Equipping the indoor and outdoor activity/playing facilities, namely learning and playing items for infants, toddlers and older children, such as:
  - *Pretend play and domestic play*: dolls and related accessories, puppets, children’s kitchen, ingredients for cooking activities, animals, and/or shatterproof mirror.
  - *Physical activity*: push and pull toys, rocking horse, small hoops, climbers for toddlers, small trampoline, play slides, tunnel systems, bowling pins, baby gyms, tricycles, tractors, different sized balls, sand pit, water trays, outdoor playground equipment, a small pool or a paddling pool, tents, and/or gardening tools.
  - *Construction*: sorting toys, building bricks, wooden cubes, soft blocks and/or jigsaw bricks.
  - *Arts and crafts*: wax crayons, water colours, colouring pencils, modeling materials, white/colour paper, ribbons, fabric scraps, balloons and plasticine.
  - *Musical instruments and audio/video equipment*.
  - *Listening and reading*: age-appropriate books, alphabetic magnets, board games and/or nursery rhyme music.
  - *Numeracy*: sorting and counting, measuring scoops, shapes and/or balances.
  - *Other*: playpen, mats, cushions, hammock, bean bags, as well as children’s chairs and/or tables.
- Separate toilets facilities for staff and children, including bathroom items and water heaters.
- First aid box, a secure cabinet for medicines and a thermometer.
- Equipping the kitchenette, for example: food warming facilities (such as an oven, hotplate and /or microwave); refrigeration facilities; steriliser/steamer, thermostatic control of water supply, drinking water; high chairs; tables and chairs; as well as crockery, cutlery, containers and cooking utensils.
- The nappy changing area, namely nappy changers and hygienic receptacles.
- A rest area, including cots, mattresses and an air extractor.
- A quiet area for story-telling.
- An office, such as desks, chairs, computers, printers, telephone, stationery and filing cabinets.
- Safe storage, including cupboards, pigeon holes for shoes and shelving
- Fire prevention and detection, such as fire detection systems, fire resistant / retardant materials, fire extinguishers and blankets.
- Various installations, including plumbing and electrical fittings, emergency lighting, telecommunications, data cabling and air-conditioning.
- Natural lighting, ventilation, insect proofing and shade.

**Table 3.1 (continued) Examples of expenditure incurred for the provision of in-house child care services**

**Operating expenses:** The four case studies reported the following indicative annual costs for running their respective in-house child care services in recent years:

- MDH has budgeted €178,000 for the calendar year 2010.
- UOM's records show that the University spent €153,000 during the financial year covering October 2008 and September 2009:
  - €95,000 was related to the child care centre operated between October and June.
  - €58,000 was spent for the Kids on Campus programme that runs from July to September.
- ETC's accounts indicate that €37,000 was spent in 2009 for operating the child care facility.
- Information provided by WSC show that €22,000 was spent for 2009.

It is important to note with respect to these amounts that:

- In addition to specific budgets, these organisations also cover other expenses (such as costs of utilities) that are directly or indirectly related to the running of child care services under other expenditure categories.
- Major differences in expenditure among the four case studies are mainly due to the higher number of staff required to operate the larger facilities and the rent paid by MDH for leased premises.
- With the exception of MDH, some of the operating expenses of these child care services were recovered through fees charged to parents.

The following are illustrative examples of the different operating expenses incurred by the four case studies to run their in-house child care services:


- *Staff costs;* Namely salaries and allowances of engaged full-time and part-time specialised child care and support staff, as well as payments to contractors for outsourced staff. Other related costs can include one-off recruitment expenses for engaging or replacing child care staff as well as ongoing training costs. In general, staff costs were found to account for a large proportion of the total operating child care costs (approximately 90 per cent).
- *General and administration costs;* These expenses cover day-to-day administrative expenses and petty cash items (such as stationery, milk and insurance premiums), the costs of utilities (namely, water, electricity as well as the use of telecommunications), routine expenses related to the cleaning and proper upkeep of the facilities (such as cleaning consumables, laundry or carpet cleaning).
- *Certification and audit fees;* Areas covered include periodic health and safety audits as well as annual certifications of electrical appliances by an electrical engineer. Some of these costs are avoided as assessments are carried by an organisation's Health and Safety Officer or other internal staff.

**Cost recovery:** The four case studies collect fees for registration and for the use of the services, apart from organising small-scale fundraising initiatives. Typical revenues collected in recent years were:

- UOM: €40,108 in fees for the period October 2008 and June 2009 when the child care centre was in operation. In addition, UOM also collected €89,190 as fees from parents for their children's participation in the summer programme running from July to September 2009.
- ETC: €11,505 were collected as fees from parents during 2009. Moreover, ETC also organises small-scale events, such as lunchtime events, to collect some additional funds.
- WSC: €3,247 were collected as fees for all of 2009.
- MDH: Approximately €3,000 were collected through contributions made by parents for the purchase of crafts.

Source: NAO Working Papers (2010)

**Table 3.2 Overall costs of other child care arrangements**

	<p><b>Malta Information Technology Agency</b></p> <p>During 2009, the overall cost of child care incurred by MITA for eighteen children was €10,023. This was the total value of payments made by MITA for claims submitted by employees of €0.82 for every hour their child (up to the age of five) spent at a registered child care centre or at a private school while they were at work.</p> <p><b>The Rehabilitation Hospital, Karin Grech and the former Zammit Clapp Hospital</b></p> <p>During 2009, ZCH/KGH paid a third-party service provider €13,697 for child care arrangements. Part of this global cost was recovered through the €769 collected from employees using this arrangement during 2009.</p>
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Source: NAO Working Papers (2010)

## 3.2 Issues related to premises and facilities

3.2.1 The analysis carried out by NAO, based on the information provided by the six case studies, indicates that these organisations faced one or more of the following three challenges when developing their premises and facilities for child care:

- The difficulty of securing a suitable and permanent site within an organisation's premises or in a nearby location.
- The protracted timeframes required to obtain a development permission from MEPA.
- The work required to develop and maintain high quality facilities that are also in line with the national standards for the provision of child care as well as other applicable regulations.

3.2.2 The following paragraphs discuss each of these factors in more detail.

### *The difficulty of securing a suitable permanent site within an organisation's premises or in a nearby location*

3.2.3 When looking for or allocating a suitable site within their premises or in a nearby location, some of the case studies had difficulties to earmark a definite space for an on-site child care centre. The following examples highlight the specific difficulties faced by three of the case studies:

- (a) At MITA, management concluded that it was practically impossible to have, within the Agency's building, a child care centre that is located at ground floor level and that has the required indoor and outdoor facilities. Moreover, MITA concluded that securing a suitable site near the Agency's offices would have been too costly.

- (b) At WSC, after a relatively short time operating from a designated area in the Institute of Water Technology within the Corporation's grounds, a decision was taken to relocate to an adjacent site once this was converted to a child care facility. WSC indicated that it had to take this drastic action as the current location of the existing child care centre was obstructing passageways. Moreover, the opportunity was being taken to upgrade the outdoor facilities.

- (c) In the case of MDH, efforts over the years to use a permanent site within the Hospital's grounds or in a nearby location led to no tangible results. The following leads were followed:

- Space was initially allocated for an in-house child care centre in the original design of the new hospital but was instead eventually used to house the Malta Medical School. As a consequence, nearby premises were temporarily leased.
- Subsequently, advanced plans and estimates were made to construct the child care facility in an existing courtyard within MDH.
- In parallel, the opportunity to purchase nearby premises to serve as a child care facility was explored. The difficulty with this option was to secure the funds necessary to initially purchase the property and subsequently to cover the significant cost of structural alterations, refurbishment and other finishes required to commission the building as a child care facility.

3.2.4 On the other hand, both ETC and UOM found ample space within their grounds to house their on-site facility. In the case of ETC, the Corporation made use of a disused building to accommodate its child care centre. At UOM, the University estimated that the area available for the playschool and office was nearly double the minimum

required by the National Standards for Child Day Care Facilities and thus there were no difficulties in developing the initiative.

### *The protracted timeframes required to obtain a development permission from MEPA*


3.2.5 Converting a site into a child care facility requires the application for a development permission from MEPA. The Authority outlines in its Supplementary Planning Policy Guidance - Child Day Care Facilities of May 2006 a number of considerations that need to be taken into

account when assessing whether a site is appropriate for the provision of child care services. Several of these issues are highlighted in Table 3.3.

3.2.6 Three of the case studies applied for a development permission from MEPA:

- ETC requested permission to change the use of part of its premises to operate a child care facility.
- MDH applied for permission to construct a new facility.
- WSC applied for permission to relocate an existing facility to a nearby site.

**Table 3.3** **MEPA’s supplementary planning policy guidance for child day care facilities**

	<p><b>An appropriate location</b></p> <p>MEPA emphasises that child care centres should be sited in specific preferred locations, such as Residential Areas and Employment Hubs. Centres situated in these areas facilitate access to working parents for child care facilities and underscore the importance of such services to the community. The Authority also deems that child care centres on the site or within the buildings of large-scale employers are acceptable as long as others requirements are satisfied. In addition, MEPA specifies that development applications for child care centres on arterial, distributor or other heavily trafficked roads should be avoided due to the presence of undesirable levels of chemical pollution and noise, as well as the risk of traffic accidents.</p> <p><b>Suitability of the premises</b></p> <p>Matters such as the size and layout of the premises, as well as the number of children under care are primarily assessed by DSWS. Moreover, MEPA reviews land-use policy planning issues, namely the:</p> <p>(a) <i>Suitability of the building itself:</i> MEPA ensures that all proposals for the development of child care centres are in accordance with the Equal Opportunities (Persons with Disability) Act (Chapter 413). The Authority also considers detached properties as being advantageous as these are more likely to have space for an outside play area. Moreover, MEPA in its guidelines, gives due consideration to the protection of the amenity of the surrounding area, as well as to safeguarding of the heritage value of historic buildings.</p> <p>(b) <i>Appropriateness of the actual site proposed for the development:</i> The Authority also specifies that proposed child care centres are located outside areas that, due to other uses, generate noise, disturbance, heavy traffic flow and inferior air quality. This is essential as such conditions would detract from the high quality environment necessary for the care of young children.</p>
<p><b>Scale of the development</b></p> <p>This is a key determinant of the impact of a child care centre on adjacent properties, traffic generation and car parking. MEPA classifies centres into three broad categories:</p> <p>(a) <i>Low impact development:</i> child care centres catering for fifteen or less children.</p> <p>(b) <i>Medium impact development:</i> centres catering for between sixteen and twenty-five children. This should require a drop-off point for children situated close to the site entrance as approved by Transport Malta.</p> <p>(c) <i>Significant impact development:</i> child care centres for more than twenty-five children. These centres are considered to have more serious impacts on the surrounding area. Sufficient parking spaces and a drop-off point should made available.</p>	

Source: Supplementary Planning Policy Guidance - Child Day Care Facilities, Malta Environment and Planning Authority (2006) and National Standards for Child Day Care Facilities, Ministry for the Family and Social Solidarity and the Ministry of Education, Youth and Employment (2006)

3.2.7 For all the three cases, the process of applying for a development permission was relatively lengthy (taking more than a year) as it required consultations with various authorities, site inspections, accessibility audits as well as the need for the applicants to submit new designs and additional information.

*The work required to develop and maintain high quality facilities*

3.2.8 As outlined in Chapter 1, DSWS carries out voluntary assessments that help child care service providers ensure that their facilities and operations meet the conditions set out in the National Standards for Child Day Care Facilities of July 2006. Table 3.4 describes the areas that are assessed by the Department with regard to premises and facilities.

3.2.9 In the case of the in-house child care facilities considered in this study, DSWS carried out the following two types of assessments over the years:


- (a) The Department visited ETC, UOM and WSC in order to provisionally register and/or renew the annual registration to operate a child care facility.

(b) Furthermore, DSWS carried out ad hoc assessments:

- (i) *To evaluate whether considered sites were suitable for child care:* ETC, MDH and WSC worked closely with DSWS when initially evaluating the suitability of considered sites for the development of child care facilities.
- (ii) *As part of the application process for a development permission from MEPA* (refer to Table 3.3): For example, MDH required a declaration from DSWS when applying for a permit to construct a new facility that clearly stated that the indoor and outdoor areas (as indicated in the designs) were suitable for child care services.

3.2.10 In addition, all four case studies carried out Health and Safety audits as required by Standard 4 of the National Standards for Child Day Care Facilities. Three organisations (ETC, UOM and WSC) also surveyed employees with children using the child care services on the physical environment and facilities. Furthermore, another organisation (MDH) was inspected by the Department for Environmental Health on food safety and environmental health issues.

**Table 3.4 Criteria used by DSWS to assess the suitability of child day care facilities**

<p>DSWS’s methodology includes that the Department’s assessors visit the considered sites or the operating facilities to:</p>	
<ul style="list-style-type: none"> <li>(a) Check whether the child care centre is at ground floor level, has natural light, is ventilated and smoke-free, and is kept damp-free and at a comfortable temperature.</li> <li>(b) Check the adequacy of the space for both indoor and outdoor activities, verifying that there is a minimum space allowance of five square metres for every child and that the outdoor area constitutes twenty per cent of the total space. Consideration is also given by the assessors to free movement in the play areas.</li> <li>(c) Ensure that the layout of the centre facilitates the carers’ supervision and engagement with children. The assessors also check whether the facility includes a kitchenette, rest area (for children under the age of one year), nappy changing area, and separate toilets for staff and children.</li> <li>(d) Evaluate whether the centre has suitable and sufficient indoor and outdoor equipment that is appropriately designed for the ages of the children being taken care of. Such equipment and toys should cater for: pretend play, construction, domestic play, physical activity, arts, crafts, music, listening, reading and numeracy.</li> <li>(e) Examine the facilities’ commitment to safety and security, their efforts to upkeep and maintain the site, as well as the degree of hygiene, cleanliness and accessibility. The assessors examine the procedures, measures and monitoring mechanisms (such as audits) used by the service provider to encourage and ensure effective management, prevention and control. The assessment also takes into consideration health and safety or risk assessments periodically carried out by the organisations themselves.</li> </ul>	

Source: Department for Social Welfare Standards, 2010 and the National Standards for Child Day Care Facilities, Ministry for the Family and Social Solidarity & the Ministry of Education, Youth and Employment (2006)

3.2.11 NAO noted that substantial effort and resources were required over the years by all four case studies to develop and improve the facilities as well as to ensure compliance with National Standards and regulations. Table 3.1 above already gave an indication of the considerable work and costs involved to develop and maintain a child care centre. The following case study examples provide additional insights on some of the challenges that have been faced:

- (a) *Constraints of indoor facilities:* Although, in general, the buildings used for child care in all the four case studies were suitable, the organisations in question faced a number of constraints, throughout the years, to ensure that these sites met the growing demands of child care. In one or more cases the following difficulties were encountered:
- Problems with finding sufficient internal space to appropriately accommodate all the facilities required by the National Standards.
  - Difficulties due to conditions set by landlords. For example, at MDH, the leased premises were found not to be ideal as the building was not being used solely for child care.
  - The need to change existing structures or installations in order to ensure, for example, sufficient natural light, proper ventilation, suitable emergency exits, as well as child-safe and appropriate electrical and plumbing fittings, fixtures, equipment and furnishings.

- (b) *Limitations related to the outdoor play areas:* Developing suitable outdoor facilities has been more challenging to most of the case studies. For example, ETC, during the course of the study, indicated that it needed to carry out structural changes to provide an appropriate outdoor play area that is enclosed and safe for children. WSC has also experienced similar constraints, and children as a consequence were spending most of the time indoors. Both organisations were planning to rectify these concerns.
- (c) *Safety issues:* The case study organisations also invested considerable time and money to meet critical health and safety conditions and regulations, including carrying out health and safety audits and certifications, as well as taking several remedial measures to remove dangers and ensure proper prevention

### 3.3 Administration and management

3.3.1 NAO evaluated the following two fundamental elements concerning the administration and management of child care arrangements:

- (a) The deployment of a sufficient number of qualified and experienced staff to manage and deliver quality in-house services.

**Table 3.5 Eligibility criteria for child care staff recruitment**

<b>Child Care Supervisor/Principal/Manager</b>	
<b>Age</b>	21 years or over
<b>Experience</b>	Past experience working with children
<b>Qualifications</b>	<ul style="list-style-type: none"> <li>• Child care qualifications recognised by the Malta Qualification Council</li> <li>• Relevant training in management or administration</li> <li>• Certificate in Paediatric First Aid obtained within the last three years</li> </ul>
<b>References</b>	<ul style="list-style-type: none"> <li>• A recent and detailed Police Conduct Certificate</li> <li>• Two character references</li> </ul>
<b>Child Carer</b>	
<b>Age</b>	18 years or over
<b>Experience</b>	No previous experience is required
<b>Qualifications</b>	<ul style="list-style-type: none"> <li>• Child care qualifications recognised by the Malta Qualification Council</li> <li>• First Aid Certificate obtained within the last three years</li> </ul>
<b>References</b>	<ul style="list-style-type: none"> <li>• A recent and detailed Police Conduct Certificate</li> <li>• Two character references</li> </ul>

Source: National Standards for Child Day Care Facilities, Ministry for the Family and Social Solidarity & the Ministry of Education, Youth and Employment (2006)

- (b) The establishment of comprehensive child care policies and procedures.

*The deployment of a sufficient number of qualified and experienced staff*

Required qualifications, experience and qualities of child care staff

3.3.2 An in-house operation requires front-line and supervisory staff with specialised child care qualifications and competencies. The National Standards for Child Day Care Facilities, launched in 2006, state that children should be cared for by qualified, knowledgeable and trustworthy persons with the necessary aptitude, attitude and skills to provide good quality care and to respond appropriately to

children’s different needs. Moreover, the Standards require that supervisors and carers should be recruited according to the eligibility criteria listed in Table 3.5.

3.3.3 The role of the Child Care Supervisor/ Principal/ Manager is pivotal within the operation of an in-house child care facility. The individual occupying this post has to be sufficiently qualified and experienced in order to take responsibility for the quality of the child care services, the maintenance of administrative systems, the handling of the day-to-day matters, and taking care of children. Table 3.6 outlines the various responsibilities and duties of this post.

3.3.4 In all the four case studies with such services at the workplace, the required personnel had to be recruited externally or contracted out to a service provider. None of

**Table 3.6 Role of supervisory staff**

A review of forwarded job descriptions carried out by NAO indicates that, in general, supervisors of in-house child care facilities had the following roles and responsibilities:

- (a) Ensure abidance with established policies and procedures.
- (b) Design as well as ensure the consistent and effective implementation of the appropriate child care, learning and play programmes. This includes:
  - Creating an environment appealing for children.
  - Planning daily activities.
  - Allocating children with the respective carers.
  - Taking measures to integrate children with special needs.
  - Undertaking initiatives to enrich the children’s experiences by organising a wide variety of activities.
  - Efforts to promote the service in order to secure an adequate take-up.
- (c) Maintain order and discipline, including helping to resolve any conflicts that may arise amongst children, staff and parents, as well as reporting any incidents.
- (d) Manage administrative systems for the efficient running of the child care facility. Tasks typically include:
  - Registration and the monitoring of child attendance.
  - Submitting plans, proposals and reports as required by the particular organisation.
  - Requisitioning, organising and monitoring the use of resources.
  - Ensuring that there is proper maintenance and upkeep of the facilities, including reporting faults, having adequate health and safety measures and ensuring proper hygienic conditions.
  - Managing staff and providing on-the-job training.
  - Compiling and updating the manual with relevant policies and procedures.
  - Keeping adequate records, including a detailed inventory, personal records of children, and daily reports of staff on duty.
- (e) Act as the focal point for communication with parents, other sections of the organisation, suppliers and regulatory authorities.

Furthermore, it was also clarified to NAO that supervisors of the child care centres were, in general, directed and assisted (to varying degrees) by a support or line manager/senior manager responsible for a broader function or operation. In practice, decisions such as those involving procurement and contract management issues, as well as those requiring changes to existing policies, procedures and arrangements were taken at management level.

Source: NAO Working Papers (2010)



the case studies indicated that they had difficulties with the recruitment of such personnel. One of the reasons is the fact that various types of courses and traineeships on child care, child development and early childhood education are, or have been, provided through training organisations such as: ETC, the Malta College of Arts, Science and Technology (MCAST), UOM, local privately-owned training centres and foreign educational institutions (via distance learning). Appendix D lists examples of such courses offered by national educational and training institutions.

**3.3.5** As at January 2010, all employees in the post of Child Care Supervisor/Principal/ Manager as well as in the position of Child Carer engaged by the four case studies had at least attended a foundational course on child care and child development. Some of the staff also had a diploma in this field from MCAST, a local private training organisation or from foreign academic institutions. A carer also possessed an undergraduate degree in Child Psychology. Moreover, a number had participated in traineeships organised over the years by ETC and/or had gained experience in child care centres locally or abroad.

**3.3.6** In addition, as at January 2010, five of the nineteen child care and supervisory staff also had valid certificates in First Aid, with ETC and WSC being compliant with the National Standards. In the case of UOM and MDH, this was an outstanding concern as none of the employees possessed a valid certificate or had received recent training in this field. MDH subsequently reported to NAO that it had rectified this situation by providing, in March 2010, a First Aid course to twelve employees. UOM has also committed itself to provide such training during 2010.

**3.3.7** Furthermore, helpers were also employed by the two case studies with the larger facilities, namely MDH and UOM. These employees directly engage with children and their role is to help carers by preparing food, helping during feeding, changing nappies and by performing other general duties. None of the helpers had child care qualifications. In the case of MDH, the two helpers used by the Hospital at the child care facility were trained in 2009 in food hygiene and obtained the relevant licence (Licence B as scheduled in Legal Notice 178 of 2001).

**3.3.8** Apart from basic training and qualifications required by the National Standards, two of the case studies had also referred their child care staff to the following relevant training:


- (a) At ETC, the two full-time employees working at the child care facility attended short courses related to business writing skills, secretarial skills and office skills. In addition, they received training on customer care and on the handling of difficult clients. Such programmes helped them to develop skills and know-how that are essential for operating an office and offering a front-line service. Furthermore, the two employees attended training on child care that helped to enhance their abilities to care as well as handle the development and behaviour of young children.
- (b) Another good practice was an informative session on handling difficult child behaviour that was organised at MDH for all the staff working at the facility as well as for parents. The event which was facilitated by an Early Years specialist focused on various aspects, including the reasons for misbehaviour and difficult behaviour; how to respond to and handle different behaviours; the significance of positive attention; as well as the importance of consistency and routing.

#### Required number of child care staff

**3.3.9** One of the key challenges faced by the case studies with in-house facilities was to ensure that the centre operated, on a daily basis, with at least the minimum number of child care staff as specified in the National Standards for Child Day Care Facilities of 2006 (outlined in Table 3.7). These Standards set out the required ‘carer to child’ ratios that need to be maintained at any time in order that children receive adequate individual attention from their designated carer.

**3.3.10** As at January 2010, the four case studies in question had the following staff working at their child care

**Table 3.7** Appropriate ‘Carer to Child’ ratios

	Age of children	Children per carer
	0 to 12 months	3
	13 to 24 months	5
	25 to 36 months	6
	Mixed Group (within the Mixed Group only one child can be under the age of 18 months)	6

Source: National Standards for Child Day Care Facilities, Ministry for the Family and Social Solidarity and the Ministry of Education, Youth and Employment (2006)

centre:

- Thirteen full-time employees that were directly engaged by the case study organisations.
- Two part-time staff that were paid directly by these organisations.
- Eight outsourced staff (in the case of MDH) that were contracted out from an external service provider.
- In addition, three of the four cases studies, namely ETC, MDH and WSC, outsourced cleaning services. The engaged contractors were expected to carry out general cleaning and sanitation procedures on a daily basis.

3.3.11 Such staff levels were essential in order to ensure that a sufficient number of carers were attending to the children. NAO noted that different measures and arrangements were adopted by the case study organisations to cater for varying demand and contingencies. For example:

- (a) At ETC, in January 2010, the Corporation relied on two full-time employees to operate its child care facility, one of whom acted as the Child Care Supervisor. In February 2009, DSWS assessors found the Corporation's child care facility to be compliant with the 'carer to child' ratios stipulated in the National Standards. In addition, the Corporation had also used trainees and had an arrangement with two relievers to complement or substitute full-time employees when the latter were absent. The organisation found these measures to be highly effective for ensuring the continuity of service.
- (b) In the case of MDH, the hospital relied considerably on outsourced staff provided by a private contractor. In fact, out of a complement of twelve child care staff (excluding cleaners), only four were MDH employees (including the person acting as the Child Care Supervisor). The remaining eight workers were engaged through the private contractor.

MDH's outsourcing arrangement can be beneficial as it can reduce the time required to recruit qualified carers whenever there is the need to replace staff. It can also allow for increased flexibility as the contractor is bound to replace unsuitable individuals. Furthermore, through this arrangement, substitute staff are provided by the Contractor to replace those on sick or vacation leave. On the other hand, the use of outsourced workers can have its limitations as new staff members have to be inducted and trained in the procedures and work practices specific to the child care centre. Moreover, there is a higher risk of staff turnover due to the low job security that is associated with such arrangements. Outsourcing also requires strong contract management capabilities,

including ensuring that the appropriate conditions and specifications are set and that measures are in place to ensure that the agreed requirements and service delivery standards are achieved and maintained.

NAO noted that MDH's facility is not inspected by DSWS and, therefore, compliance with the 'carer to child' ratios stipulated in the National Standards has not been assessed. Nevertheless, it was observed that during January 2010 the available staff complement at MDH was, in practice, higher than the minimum required by the National Standards.

- (c) At UOM, the University had, (in January 2010) six full-time employees working at the in-house child care centre. Apart from the Principal, three child carers and two helpers worked at this facility. In October 2009, DSWS found that the helpers were unqualified in child care and that this had to be remedied. UOM indicated to the DSWS that both helpers intended to undergo training in child care. Furthermore, in May 2010, a temporary child care assistant was engaged by UOM to provide additional support.
- (d) In the case of WSC, as at January 2010, a full-time employee (who also acted as the Child Care Supervisor) as well as two part-time carers worked regularly at the facility. The Corporation has found that the use of both full-time and part-time staff gave WSC the required flexibility, given that most children attended the centre only in the morning. DSWS, during an assessment visit in October 2009, found the Corporation to be compliant with the stipulated 'carer to child' ratios. In January 2010, the available staff complement at WSC was, in practice, higher than the minimum required by the National Standards.

#### Monitoring the quality of services offered by the child care staff

3.3.12 All four case study organisations indicated that they used various formal and informal approaches to monitor and evaluate the quality of the in-house services offered by their child care staff. These included:

- (a) *Regular informal contact:* It is standard practice among all the four case studies with in-house facilities that the child care supervisor and staff engage with parents when the latter leave and collect their children. Parents also have the opportunity to communicate with child care staff, on an informal basis, during occasional events organised by the centre. Such communication is important for ensuring better learning and social development;

for raising any concerns related to emotional and behavioural issues of a child; as well as for discussing a child's progress, interests, strengths, likes and dislikes. Moreover, this contact provides an opportunity for explaining what the facility is organising; the approach being applied and why; the type of activities that the child participated in; as well as how the parent can get involved.

- (b) *Formal meetings on the child's individual progress.* One of the case studies (UOM) has also developed a checklist that was used to discuss issues and concerns related to the children's individual development and accomplishments. During 2010, these discussions were held through formal mid-year meetings with each parent.
- (c) *The circulation of a newsletter:* This practice was also observed at UOM. The Principal at the University's child care facility issues a monthly newsletter for parents. The in-house publication includes information on past activities, future events and new developments. It also has dedicated pages with information on child upbringing and includes articles written by parents discussing their children's experiences at the child care centre.
- (d) *The establishment of an internal network that includes the participation of child care staff, management and users:* Since the introduction of the child care centre, ETC has used meetings and electronic mail to engage parents and collect frequent feedback.
- (e) *The use of questionnaires:* Two of the four case studies also developed questionnaires to elicit from parents their views and perceptions on the child care operations and on delivered services:

- At WSC, a questionnaire was developed to ask parents to rate the quality of the service, to list what they like and what they would change, and to give their views on the staff's attitudes and competences. This medium was found effective in obtaining detailed written feedback and was used to identify any areas for improvement. However, the questionnaire was being given to parents after nine months using the child care service. This procedure inherently limited the extent of feedback that was received as other parents that were using the service for shorter periods were not included.
- Furthermore, UOM had organised in 1997 a survey among users on the quality of the in-house child care services. However this evaluation was not repeated. Through the survey,

the University obtained valuable feedback on various issues including insights on the quality of the programmes and activities delivered by the child care staff; on the level of individual attention and care being given to the children, as well as on potential opportunities to increase parent involvement.

### *The establishment of comprehensive child care policies and procedures.*

3.3.13 Child care policies, procedures and related documentation are essential in order to:


- Define and manage processes
- Instil adequate risk management in the systems
- Drive professionalism in the way a child care centre is operated
- Ensure adherence to rigorous requirements on various aspects of child care
- Deliver efficient and high quality services

3.3.14 The National Standards for Child Day Care Facilities of 2006 specify that a child care facility must have in place a written manual of policies and procedures that are consistently used to administer and operate the service. Table 3.8 includes a list of the areas that should be included in the contents of this manual. The wide range of matters that need to be addressed reflects the considerable responsibility that an organisation enters into when providing such services at the workplace.

3.3.15 By May 2010, three of the four case studies (namely ETC, UOM and WSC) had undertaken considerable effort to compile and maintain a manual with related documentation. The role of DSWS was critical during the development and monitoring of these policies. For example:

- (a) At ETC, during 2006, DSWS pointed out in its assessment report to the Corporation that all existing and new policies and procedures needed to be compiled into a manual of policies and procedures and that staff and parents should be made aware of the contents. ETC subsequently followed up on this recommendation.
- (b) In the case UOM, in 2009, DSWS observed that the existing manual of policies and procedures needed to be further developed to include important aspects such as the University's policies on: working in partnership with parents using the facility; the recruitment of staff and their supervision; staff development; the keeping of personal records on children and staff; whistle blowing; healthy eating and on transition. During 2010, in preparation for the next assessment by DSWS, UOM documented

**Table 3.8 Principal child care policies and procedures**

	Admission to child day care facility	Child’s personal records	Staff supervision
	Working in partnership with parents	Transition	Staff records keeping
	Safety of children	Uncollected child	Whistle blowing
	Sick child and accident management	Staff recruitment	Complaints about the service
	Behaviour management	Staff development	Data Protection
	Child protection	Healthy Eating	

Source: National Standards for Child Day Care Facilities, Ministry for the Family and Social Solidarity and the Ministry of Education, Youth and Employment (2006)

these policies and included them in the existing manual. The manual was also made available to staff and parents.

- (c) Similarly, WSC in 2009 was found by DSWS not to have all the required policies and procedures documented in its manual that is accessible to staff and parents. These included the need to incorporate policies on: data protection; equal opportunities for children and for those with special needs; food and drink; whistle blowing; working in partnership with parents; transition; staff management; as well as on the maintenance of records of staff and children. In response to these observations by DSWS, WSC developed and included these policies in its manual.

**3.3.16** In the case of MDH, the existing handbook does not cover all the policies and procedures required by the National Standards. The document, nevertheless, sets out the key objectives and the philosophy behind the services being provided; the activities to be organised; as well as some of the procedures to be followed and precautions to be undertaken. MDH plans to replace this handbook and compile a manual with the required documentation and essential information. In the meantime, MDH indicated that key policies and procedures were being communicating verbally when parents registered their children to use the services of the facility.

### 3.4 Conclusion

**3.4.1** This Chapter has shown that there are several critical and complex challenges linked to the setting up of an in-house child care facility and its operation in compliance with the National Standards for Child Day Care Facilities and best practices. Case studies that opted for alternative arrangements, such as offering staff an established allowance for child care or fully outsourcing the service to an external provider, were found to have managed to bypass these challenges whilst still offering an effective arrangement for their employees.

**3.4.2** The provision of in-house child care services requires, first of all, a suitable and permanent site within an organisation’s premises or in a nearby location. Four of the six case studies had difficulties in securing an appropriate area for child care or found this option as being too expensive to pursue. In addition, considerable time had to pass before each of the organisations pursuing this option obtained the required development permits from MEPA and holistically complied with the criteria established in the National Standards for Child Day Care Facilities and other regulations.

**3.4.3** The experiences of the case studies have also shown that substantial work and effort, involving different levels within each organisation, were needed to prepare, develop and operate the in-house facilities. Moreover, by offering such services at the workplace, the organisations entered into considerable responsibility and all case studies had to give due attention for ensuring that policies and procedures are clear and well-documented, accessible and diligently implemented.

**3.4.4** In line with the National Standards, the process of developing in-house services also required the engagement of a sufficient number of specialised front-line and supervisory staff from outside the reviewed organisations. Child care employees also had to be suitably qualified and trained. Furthermore, the organisations had to define and establish the role and responsibilities of the Child Care Supervisor/Principal/Manager. This was a new post and each organisation learned, over time, on how best to utilise and empower the persons occupying such a key position.

**3.4.5** Moreover, the establishment of child care services at the workplace involved significant costs to develop and operate a suitable facility. Only a proportion of the total child care costs were recovered by the case study organisations. The employers, nevertheless, considered these expenses as necessary to fulfil their overall strategic and human resource objectives and priorities.



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## Appendices

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## Appendix A - Methodology

**A.1** A range of information sources and analytical techniques were used to evaluate the development and management of child care arrangements for public employees.

**A.2** Prior to the launch of the audit, informative discussions were held with ETC, MPO and CBU on Government's priorities and policies related to child care arrangements for public employees.

**A.3** Fact-finding interviews were also conducted with DSWS to gain a comprehensive understanding of the applicable National Standards. In addition, information was also obtained from the Department on the processes applied for voluntary registration of child care facilities.

**A.4** In parallel, desk research on child care arrangements was undertaken in order to:

- Better understand the benefit of such arrangements at the workplace.
- Identify the applicable regulatory requirements.
- Determine the investment and processes needed for the development of appropriate in-house facilities.
- Obtain insights on critical underlying issues and concerns.
- Collate good practices in this field.

**A.5** This also included examining earlier assessments on the provision of child care that were compiled by national public entities (refer to Table 1.4 in Chapter 1), as well as reviewing the extensive international literature on the topic available in the public domain. The bibliography used to inform this study is listed in Appendix E.

**A.6** During the issue identification stage of the study, learning visits were also organised to public and private sector entities in order to discuss the overall organisation and management of child care arrangements. In addition, NAO attended locally organised seminars that discussed the introduction of child care and other family-friendly measures at the workplace.

**A.7** When developing the audit criteria, NAO also referred to an existing costing model for the provision of child care within a public service or public sector setting for children less than three years of age. This model was designed by MEU in 2004 in response to a request by TCCDC to develop a financial impact study of the proposed National Standards.

**A.8** Table A.1 outlines MEU's estimates, as at 2004, for the setting up of an in-house facility compliant with the applicable standards and expectations of that time. Although not up to date, several elements of this model are still highly relevant. It is important to point out that when creating this model, MEU made the following assumptions:

- (a) Centre opening hours were considered to be from 07.30 – 17.30, five days a week.
- (b) Capital expenditure was assumed not to include the cost of land as this was considered to be dependent on the area where the centre was to be set up.
- (c) The estimated number of carers for each envisaged scenario was as follows:
  - Four carers for centres catering for fifteen children (five children under one year, five between one and two, and five between two and three).
  - Five carers for centres catering for twenty children (four children under one year, eight between one and two, and eight between two and three).
  - Eight carers for centres catering for twenty-five children (ten children under one year, eight between one and two, and seven between two and three).
  - Nine carers for centres catering for thirty children (ten children under one year, ten between one and two, and ten between two and three).

**Table A.1 Model developed by MEU to estimate costs linked to the setting up of an in-house child care centre**  
(based on cost and pricing levels as at November 2004)

<b>Children per centre</b>	<b>15</b>	<b>20</b>	<b>25</b>	<b>30</b>
<b>Minimum Requirements</b>				
Indoor area (square metres)	60	80	100	120
Outdoor area (square metres)	15	20	25	30
Square metres for each child	5	5	5	5
<b>Capital Expenditure</b>				
Building {at LM50(€116)/square metre} and related MEPA permits	LM4,150 (€9,667)	LM5,400 (€12,579)	LM6,650 (€15,490)	LM7,900 (€18,402)
Kitchenette (including food warming facilities, refrigeration facilities)	LM545 (€1,270)	LM545 (€1,270)	LM545 (€1,270)	LM545 (€1,270)
Toilet facilities (including toilets for children and bath and drainage facilities)	LM560 (€1,304)	LM660 (€1,537)	LM760 (€1,770)	LM860 (€2,003)
Activity Area (including soft flooring indoor and outdoor area)	LM950 (€2,213)	LM1150 (€2,679)	LM1,350 (€3,145)	LM1,550 (€3,611)
Resting Area (including cots and mattresses)	LM600 (€1,398)	LM700 (€1,631)	LM800 (€1,863)	LM900 (€2,096)
Other (including protection material for corners, air-conditioning, fire detection system, fire extinguishers, shading structure, shatter proof glass panes)	LM1,142 (€2,660)	LM1,501 (€3,496)	LM1,862 (€4,337)	LM2,221 (€5,174)
Child Care Equipment (this refers to basic/minimum items that a centre may need)	LM975 (€2,271)	LM975 (€2,271)	LM975 (€2,271)	LM975 (€2,271)
<b>Total Capital Costs</b>	<b>LM8,922 (€20,783)</b>	<b>LM10,931 (€25,463)</b>	<b>LM12,942 (€30,146)</b>	<b>LM14,951 (€34,826)</b>
<b>Recurrent Expenditure</b>				
Coordinator, Carers, and related recruitment costs	LM29,300 (€68,251)	LM34,500 (€80,363)	LM50,100 (€116,702)	LM55,300 (€128,814)
Cleaner and cleaning consumables	LM1,311 (€3,054)	LM1,436 (€3,345)	LM1,561 (€3,636)	LM1,686 (€3,927)
Water, Electricity and Telecommunications	LM2,000 (€4,659)	LM2,500 (€5,823)	LM3,000 (€6,988)	LM3,500 (€8,153)
Insurance	LM500 (€1,165)	LM500 (€1,165)	LM500 (€1,165)	LM500 (€1,165)
Printing, postage and stationery	LM150 (€349)	LM200 (€466)	LM250 (€582)	LM300 (€699)
<b>Total Recurrent Expenditure</b>	<b>LM33,261 (€77,478)</b>	<b>LM39,136 (€91,162)</b>	<b>LM55,411 (€129,073)</b>	<b>LM61,286 (€142,758)</b>
<b>MEU's Estimate of the Total Expenditure for the First Year of Operation</b>	<b>LM42,183 (€98,261)</b>	<b>LM50,067 (€116,625)</b>	<b>LM68,353 (€159,219)</b>	<b>LM76,237 (€177,584)</b>

Source: Family-friendly Measures in the Public Sector, Management and Efficiency Unit (2004)

- (d) At that time, MEU estimated that carers with qualifications required by the applicable standards would be paid LM2.50 (€5.82) per hour and cleaners would be remunerated LM1.50 (€3.50) per hour for their services.

A.9 Once sufficient preliminary information was collected, the rigorous Issue Analysis technique was used to:

- Determine the objectives and scope of the study.
- Develop a framework of relevant issues and sub-issues.
- Define the most appropriate key audit questions and fieldwork methodology.

A.10 Fieldwork was carried out between January and May 2010 and involved the participation of six organisations from across Government. These were selected by NAO on the basis of different types of child care arrangements for public employees in place at the end of 2009. The selected case studies comprised of:

- (a) Four organisations that developed an in-house facility that is run by the organisation itself with dedicated premises as well as permanent child care management and staff (namely ETC, MDH, UOM and WSC).
- (b) Another organisation that has outsourced child care services to an external provider (ZCH/KGH).
- (c) A Government agency that reimburses part of the fees incurred by staff for child care arrangements during work hours (MITA).

A.11 Additionally, NAO met representatives of the MUMN to learn more on the priorities of the Union regarding the provision of child care for MDH employees.

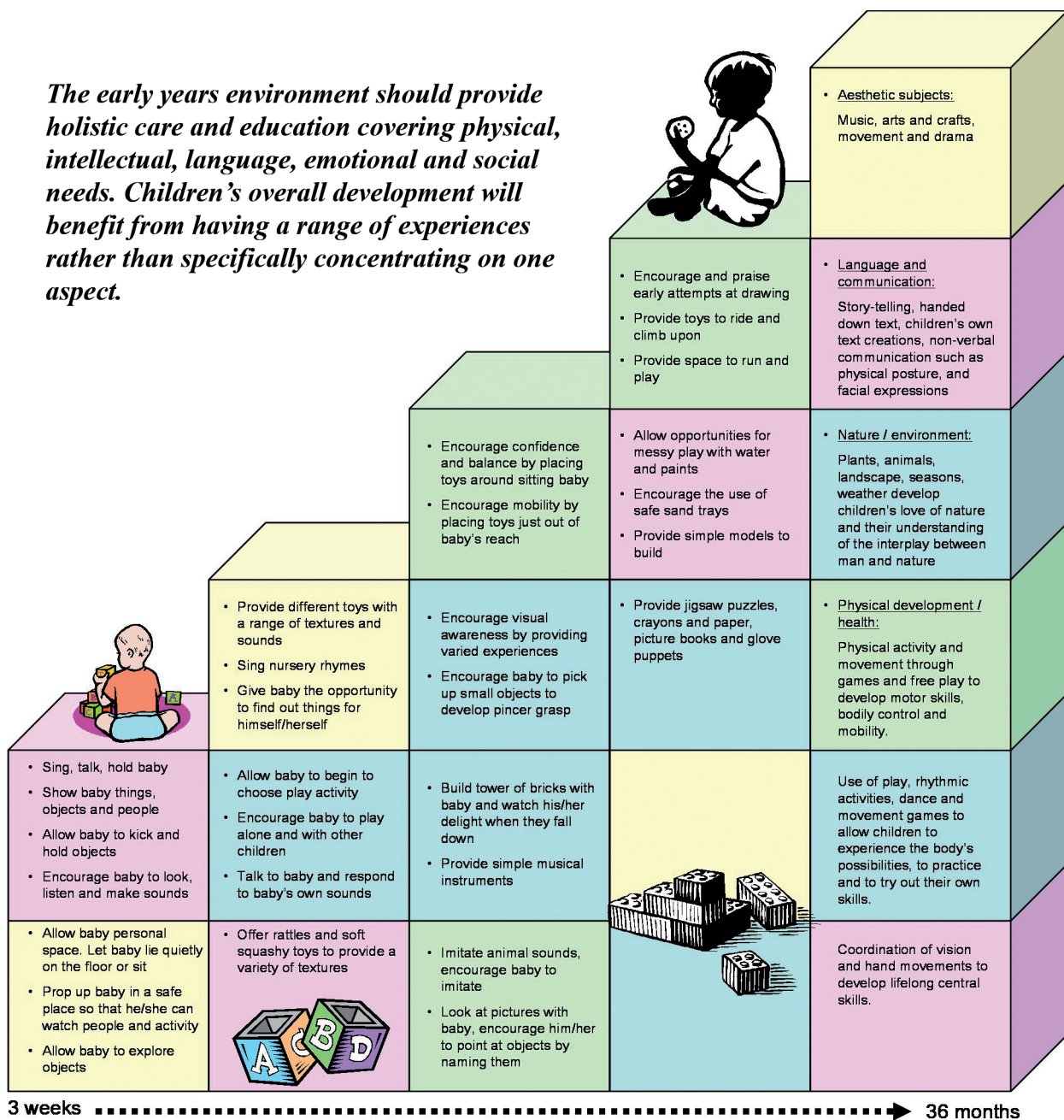
A.12 Structured interviews and tailored questionnaires were used to collect the required information from each case study. This was followed up by requests for supplementary documentary evidence to corroborate the collected feedback. In line with the established study objectives, interviews with each of the six case studies focused on the following management and value-for-money issues:

- (a) The factors that led to the introduction of child care arrangements.
- (b) The assessment of different options, costs and benefits.
- (c) The structures, procedures, processes and outsourcing arrangements established by the respective employers to operate and manage such initiatives.
- (d) The challenges faced in securing the required physical, human and financial resources for the launch and sustained provision of child care benefits for employees.
- (e) The level of monitoring and review that is carried out to ensure compliance with applicable National Standards and regulations, as well as high standards of quality of service.



## Appendix B - Different child care activities that can be organised for children aged up to thirty-six months

*The early years environment should provide holistic care and education covering physical, intellectual, language, emotional and social needs. Children’s overall development will benefit from having a range of experiences rather than specifically concentrating on one aspect.*



Source: National Standards for Child Day Care Facilities, Ministry for the Family and Social Solidarity & the Ministry of Education, Youth and Employment (2006)

## Appendix C - Family-friendly measures supporting public service employees with children

Family-Friendly Measure	Description	
Maternity Leave	Purpose	To allow maternity leave on full pay to employees, during pregnancy and confinement. A confinement will be taken to mean the birth of a living child or the birth of a child whether living or stillborn after seven months of pregnancy.
	Policy	Female employees, including employees engaged on contract, part-timers and temporary workers are entitled to maternity leave for absence from work because of pregnancy and confinement.  Maternity leave must be utilised at a stretch, in the following manner: a) a period of six weeks immediately after the date of confinement; b) the remaining eight weeks may be availed of immediately before or after confinement; and c) during pregnancy and during the 3 months starting from the date of confinement, female officers may be given alternative duties where there is an occupational risk to their Health and Safety.
	Duration	Fourteen weeks continuous paid leave.
Paternity Leave	Purpose	To allow male employees time off on the birth of a child/children.
	Policy	Male employees are entitled to paid leave on the birth of each of their children.
	Duration	Two working days.
Adoption Leave	Purpose	To give adoptive parents and adopted children, the same rights and benefits as other parents and children.
	Policy	Adoption leave with pay may be availed of by adoptive parents in new adoption cases.
	Duration	Five weeks.

Family-Friendly Measure	Description	
Parental Leave / Career Break	Purpose	To allow employees unpaid leave of absence to look after their young children.
	Policy	<p>Employees are allowed to avail themselves of 1 year unpaid parental leave to take care of their own children who are under 6 years of age. They may choose to utilise 3, 6 or 9 months instead of 12 months. The parental leave chosen must be taken in one period and may be shared by both parents. The parents must declare their option up front when they apply for parental leave. Any outstanding parental leave that is not utilised (from the 1 year entitlement) is lost and may not be availed of at a later date. This leave may be availed of in respect of each child.</p> <p>In addition, parents are allowed a total of 5 years unpaid career break to be utilised for the care of a child/children under 6 years of age. The 5 years must be utilised as a whole period, and may be reduced by multiples of three months. If the 5 years are not availed of in one whole period, the outstanding period of leave may only be taken for the care of another child. Unpaid leave from the entitlement of 5 years may be shared once by both parents, in respect of each child.</p> <p>Three months of the total parental leave entitlement may be availed of in periods of one month at a time.</p> <p>Three months from either the one year parental leave or the five-year career break, may be reserved and utilized by employees until the child reaches eight years of age, always subject to an overall maximum of eight years unpaid leave.</p>
	Duration	<ul style="list-style-type: none"> <li>• A maximum of one year parental leave, for each child.</li> <li>• A maximum of a once-only, five years career break.</li> </ul> <p>These are subject to a maximum of eight years unpaid leave in total.</p>
Leave to Foster Children	Purpose	To allow unpaid leave to officers who opt to foster a child.
	Policy	A maximum of one year unpaid leave may be utilised by officers who foster a child.
	Duration	One year. In the case of further foster placements additional unpaid leave may be granted, provided that a maximum of one year is not exceeded in a period of four years.
Responsibility Leave	Purpose	To grant responsibility leave to employees who need to care for dependent relatives.
	Policy	<p>Responsibility leave may be availed of by officers to take care of dependent elderly parents, sons and daughters, or spouses. The elderly parent or spouse must have no other responsible persons living with him during the day.</p> <p>The elderly parent, child or spouse must be certified by a medical specialist to require care. If both elderly parents are alive they must be certified as being dependent on care.</p> <p>Responsibility Leave is without pay. If the reason for which the leave is approved is no longer applicable, the employee is allowed to resume duties before the expiration of unpaid leave, provided an advance notice of one month is given. Officers who resume duties will not normally be allowed to avail themselves of responsibility leave again for the same specific reason, before a lapse of 12 months. Exceptions may be made in special circumstances.</p>
	Duration	Responsibility leave is approved for periods of not less and not more than one year every time. Unpaid leave entitlements are subject to an overall maximum of eight years unpaid leave, whether the unpaid leave is taken at a stretch or broken up by periods of resumption of duty.

Family-Friendly Measure	Description	
Urgent Family Leave	Purpose	To allow time off from work to officers, for urgent family reasons, in cases of sickness and accident, which require the immediate presence of the employee.
	Policy	Urgent Family Leave is granted in the circumstances mentioned below, when the immediate family of the employee is involved: a) accidents; b) sudden illness or sickness requiring assistance or presence of the employee; and c) presence during births and deaths.
	Duration	16 hours to be taken in not more than 4 sessions, are allowed to all employees, each calendar year.
Thirty days unpaid leave for Special Reasons	Purpose	To allow unpaid leave for any good reason.
	Policy	This measure is for officers who need to absent themselves from work beyond their vacation leave entitlement. This will help officers to manage their work and family commitments better.
	Duration	Thirty days unpaid leave in a period of twelve months.
Reduced Hours	Purpose	To allow employees to work on a reduced time-table, for better work-life balance.
	Policy	Employees who are conditioned to a 40 hour working week have the option to work on a reduced time-table which may vary between 20 and 35 hours, to the nearest hour, per week. In the case of employees who are conditioned to an alternative timetable, the hours may vary between 50% and 87.5% of their usual working hours. Officers may work on a different time-table in winter and in summer.
	Duration	<p>Employees who are granted permission to work on a reduced time-table will be expected to continue to work on the basis of the approved arrangement for a period of 12 months and will, during such period, not be entitled to the grant of unpaid leave or to revert to their normal work time-table, unless proof is given that the reason for which the reduced time-table was requested no longer applies. An advance notice of at least 1 month would have to be given to the Head of Department. Those who resume full time duties after a period of reduced hours will not be allowed to take reduced hours again for the same specific reason, before the lapse of 12 months from the date when they resume full time duties. Exceptions may be made in special circumstances.</p> <p>Arrangements for employees to work on a reduced time-table may be renewed, subject to the approval of the Head of Department, for successive periods of 12 months and the terms of the arrangements (e.g. number of hours to be worked) may be reviewed at the commencement of such renewal periods.</p>

Family-Friendly Measure	Description	
Teleworking	Purpose	To allow employees to work from home, using information and communications technologies. This method of working enables employees to combine career and family responsibilities more effectively. Teleworking also facilitates the possibility for an employer to retain experienced employees and keep benefiting from their input. The arrangement is meant to develop a win-win situation where the department's output is maintained, and possibly improved, while the employee is supported in combining work and family responsibilities.
	Policy	A detailed policy document was issued in February 2008. The purpose of this policy is to set up a formal framework for the administration of telework in the public administration of Malta. This policy document outlines the general principles on which telework should be administered in the Maltese Public Service and Public Sector and is intended to be used in combination with the Teleworking guidelines. Complementary to this policy, the appended guidelines are intended to facilitate the implementation of telework as a flexible working arrangement.
	Duration	A teleworking contract is valid for a period of 12 months, and may be renewed annually.
Flexibility in Work Schedules	Purpose	To introduce the concept of flexibility in work schedules, in line with the Collective Agreement for Employees in the Public Service, 2005 - 2010.
	Policy	<p>The need for flexibility in work schedules is recognised by both the Government as employer and the employees.</p> <p>Flexible work schedules strengthen the service offered to external and internal clients, while decreasing to a minimum the need to adhere to rigid timetables, which as a rule helps employees to achieve a better work-life balance. The organisation and the employees can jointly establish a 'best fit' model to achieve the set objectives, in the best interest of all stakeholders.</p> <p>To introduce flexibility, departments are encouraged to adopt alternative timetables during the summer months, so that their department offers an uninterrupted service in the months of July and September.</p> <p>After the summer months, Permanent Secretaries are required to submit an objective and critical analysis of the outcome, benefits and shortcomings of the flexible work schedules adopted in their respective Ministry.</p>
Unpaid Leave – General Conditions	Purpose	To summarise the general provisions currently in force, covering applications for and the grant of unpaid leave, outlined in this manual.
	Policy	Employees are allowed to utilise unpaid leave for various reasons, many of which have been dealt with in this manual.
	Duration	Unpaid leave entitlements may be followed by each other, subject to an overall maximum of eight years unpaid leave, whether the unpaid leave is taken at a stretch or broken up by periods of resumption of duty. This provision also applies to paid or unpaid leave for development work abroad.

Source: Management and Personnel Office, Office of the Prime Minister (2009)

## Appendix D - Professional training on child care, child development and early childhood education offered by state organisations

D.1 Apart from private companies and foreign educational institutions offering professional training in this field, various state organisations are, or have in the past, offered specialised courses on child care, child development and early childhood education.

Malta College of Arts, Science and Technology (MCAST)

D.2 MCAST offers the following introductory, foundational and diploma courses in child care at different National Vocational Qualification Levels (NVQs):

- (a) *Introductory Certificate in Care (awarded by MCAST)*: This is an NVQ Level One full-time course that provides a general introduction to care and care skills.
- (b) *Foundation Certificate in Care (awarded by MCAST)*: This NVQ Level Two course provides training on skills in the care trade and includes a significant amount of vocational practice.
- (c) *Diploma in Health and Social Care (awarded by MCAST-BTEC)*: This NVQ Level Three full-time course focuses on social care and is designed to develop and equip students with the knowledge and understanding of practical skills required at an operational level in the care sector. The course offers students the opportunity to work with children and the possibility to progress to vocational qualifications.
- (d) *National Diploma in Children's Care, Learning and Development (awarded by MCAST-BTEC)*: This two-year NVQ Level Four full-time course is designed to enable students to work in a professional capacity with children in child care and kindergarten centres. The qualification provides the skills, knowledge and understanding required in an early years environment. Study units include:

- Positive Relationships for Children's Care
- Learning and Development
- Positive Environments for Children's Care, Learning and Development
- Promoting Children's Development
- Reflecting on and Developing Practice for Children aged 0-8
- Safeguarding Children
- Promoting Children's Rights
- Children's Learning Activities and Play
- Diet and Nutrition for Children
- Physical Activities for Children
- Psychological Perspectives on Children's Behaviour
- Supporting Children's Numeracy Skills
- Supporting Children's Literacy Skills
- Design and Technology for the Early Years Practitioner
- Combined Science for the Early Years Practitioner:
  - Life Processes and Living Things
  - Materials and their Properties
  - Physical Processes
- Meeting Additional Requirements for Children's Settings, Learning and Development

### *Employment and Training Corporation (ETC)*

D.3 Over the years, ETC has also offered certificate courses and traineeships on child caring:

- (a) *Courses on Child Minding Skills*: In the 1990s, the Corporation offered basic courses on child minding skills.
- (b) *Child Care Foundation Courses*: In subsequent years, ETC offered more in-depth courses that focused on different aspects of child development as well as on child care. Modules on child development included learning on how a child develops physically, intellectually, socially/emotionally and

morally, apart from using imagination, creativity and language skills. Training on child care covered learning on nutrition, hygiene, care, the physical needs of the young child, childhood ailments, immunisation as well as environmental and safety issues.

(c) *Five-month Child Care Traineeships:* The Corporation has also offered traineeships in the field. These included:

- *Off-the-job training:* This covered further training on child care issues and methodology. Courses covered training the preparation of daily programmes in child care settings and evaluation; the preparation and selection of proper materials; theories and types of play; first aid; equal opportunities and special needs; parental involvement; and team work.
- *On-the-job training:* During this phase, students were monitored and examined play activities and physical care for children up to three or five years of age. The latter covered areas such as exercise, the preparation of food, feeding, cleaning and caring for equipment, bathing, nappy changing, health, hygiene and safety routines as well as settling children to rest or sleep.

(d) *Theory and Practice in Child Educare:* Another programme that was offered by ETC (as part of a project part-financed through the Structural Funds Programme for Malta 2004-2006) consisted of both a theoretical component (in line with NVQ Level Three) as well as a practical element where trainees were required to work under supervision in a child care facility.

### *University of Malta (UOM)*

D.4 The University of Malta offers a five-year part-time evening programme on early childhood education and care leading to a Bachelor of Education (Hons.) degree. The programme aims to raise the training standards and academic qualifications of staff currently employed or planning to work with very young children, particularly with three to seven year olds.

D.5 Study-units of this undergraduate programme are targeted at:

- Raising awareness and deepening students' understanding of the complexities involved in working with young learners.
- Promoting a culture of reflective practice, whereby practitioners are encouraged to evaluate, reflect upon and adapt their practice.
- Influencing planning and practice in early years settings.

D.6 The degree programme focuses on providing students with professional and pedagogical knowledge and skills, including:

- (a) A deep theoretical understanding of how young children develop and learn.
- (b) A broad pedagogical knowledge to determine appropriate and effective practices with young learners, therefore applying theory to practice.
- (c) An awareness of a range of professional issues which impact directly on the management of and relationships amongst a group of learners.
- (d) Skills needed to become competent professionals (through the practical aspects of the course).
- (e) Cognisance of and an ability to apply research skills which enable practitioners to understand on-going development in their field and critically position themselves when faced with research findings.

### *Department for Further Studies and Adult Education*

D.7 In the past, courses related to child learning and development were also offered by the Department for Further Studies and Adult Education within the Ministry responsible for Education. This was a full-time two-year course leading to a Certificate in Pre School Education.

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