

Advisory Council on the Status of Women

Tel 902 368 4510 http://www.gov.pe.ca/acsw peistatusofwomen@eastlink.ca PO Box 2000 Charlottetown Prince Edward Island Canada C1A 7N8

April 15, 2010

# Social Assistance Act Review Committee on Health, Social Development and Seniors

Dear Committee Chairperson Paula Biggar and Committee members:

Thank you for the opportunity to participate in consultations to review Prince Edward Island's **Social Assistance Act**.

We hope to be able to offer some insight into this important legislation from the

#### Mandate

The Prince Edward Island Advisory Council on the Status of Women (PEIACSW) is a provincial government advisory body dedicated to supporting women's full and equal participation in social, legal, cultural, economic, and political spheres of life. *The nine-member, government* appointed Advisory Council regularly works in collaboration with government and community groups, undertakes research on issues of concern to women, offers analysis and recommendations to policy-makers, responds to media, and creates public education resources.

The Advisory Council has a legislated mandate to recommend legislation, policies, and practices to improve the status of women on Prince Edward Island.

experience of our appointed Advisory Council members, past and present; from the women and other Islanders who call us or write to us to tell their stories, share their concerns, or appeal for help in crisis situations; and from our previous policy research and submissions by the Council.

First, we want to congratulate you on the adoption by government of the Woman Abuse Protocols under income assistance legislation. We see this as a positive framework for positive change, as it demonstrates government's continued commitment to the issue of woman abuse, to the protocols, and to the ongoing training of employees who might need to apply them.

At its March 11, 2010 meeting the members of the PEI Advisory Council on the Status of Women discussed certain aspects of the *Social Assistance Act* and

poverty as they relate to Island women. This discussion resulted in the following anecdotal comments about their constituencies:

- There is still a lot of judgment and stigmatization of welfare recipients. A lack
  of privacy and humiliation are often the experience of a social assistance
  recipient. For instance, people living out in the country will travel to
  Charlottetown to cash their cheques, so their neighbours do not find out
  about their situation.
- The perception remains that some people abuse the system. To some, even though this perception is not supported in fact, perception is often influential.
- An example was given of a woman who had left school at age 15 to care for her grandparents and then parents. Years later, alone and uneducated, she cannot afford to heat her house and eat. She is trying to hang on for a few years until she is eligible for the old age pension.
- Older women who have stayed in abusive relationships until their children were grown now face poverty and unsafe housing options if they choose to leave.
- There is inadequate dental care under social assistance (teeth are pulled instead of being filled).
- There is not enough money to buy healthy food.
- Some landlords set rents at the Social Assistance rental ceiling, no matter the size or condition of the units.
- There are few supports for people wanting to get off the system. Childcare subsidies end if people want to go back to school. For instance, women report that they are not supported in the transition period from social assistance to student loans.
- Clothing allowance is too limited.
- People must use all their assets before they qualify for assistance, and this is unfair as assistance might be temporary.
- The office for credit counselling can be too formal. An emergency fund for families that allows them to access small loans could be very useful for shortterm assistance.

# Selected Examples: What women have been saying to PEI Status of Women Office

- Loss of childcare subsidy after leaving paid employment for valid reasons. A woman in this situation and trying to transition to training faced being denied childcare subsidization by the Department of Community Services, Seniors and Labour for the two-month period bridging her from social assistance to her training program. She therefore faced losing her place in the daycare, causing unnecessary disruption for her child and a major inconvenience to herself, with a possibility of having to be returned to a waiting list. Fortunately, an alternative program was found for this woman.
- Unsafe and unhealthy housing for women leaving abuse. A woman and her family leaving an abusive situation reported living in unsafe, unhealthy housing. After two years on the waiting list for social housing, this family learned that the social housing authority had lost or misplaced their information. She had yet to have her telephone calls returned on this matter and was unsure as to whether she was still on the waiting list or not.
- Lack of support for senior women. One senior woman described the situation for many. Many medications are not available through assistance and some people remain ineligible for senior housing because they do not yet meet the age requirement. There are few vacancies in PEI Housing. In her experience, PEI offers the least support of the numerous provinces she has lived in.

## PEI Equality Report Card – Social Assistance items

Council wishes to highlight some relevant issues identified in the PEI Status of Women's **2009 PEI Equality Report Card** that relate to the **Social Assistance Act**. The Council has committed to work collaboratively with government towards good grades in all areas of the Report Card. The following issues are outlined in the Report Card, and progressive change to improve the situations described would result in improved standing.

First, the Equality Report Card highlights the need for accessible, affordable, universal, high-quality, and developmentally based child care, where PEI has the highest level of workforce participation in Canada of women with young children. With the upcoming move into public schools of our kindergarten programs, there will be a 30% loss of revenues to existing child care centres for younger children, and this will necessitate further investment by government to adjust to these changes and deal with decreased enrollments. The expansion of the Childcare Subsidy Program could help the most vulnerable women and families meet this need, which we will expand on later in this paper.

Second, despite government's increase in the minimum wage in 2009, we continue to have the lowest hourly and yearly wages in the country. The news this week of two increases to the minimum wage, to bring PEI's wage to \$9 by the fall of 2010, is welcome news and is likely to increase Islanders' incentives to find income through work. However, the *Equality Report Card* still indicates that those people living on social assistance will not be able to meet their basic needs on the amounts allocated.

The **Equality Report Card** notes that there is no action to date on a **Poverty Reduction Strategy** or similar initiative and no movement towards a departmental assessment of ways in which those living in poverty can be further assisted. Still lacking is the hiring or the designation of a qualified full-time poverty reduction strategist.

The **Equality Report Card** also calls for more emphasis on government developing effective partnership models for work with community organizations and agencies. For instance, the recent announcement by our government that it would be entering into an agreement with a private developer to create more long-term housing units for seniors under a federal housing grant raises some potential concerns for Council.

The idea is that government will lease back the units for senior use, and seniors have been publicly assured that rents will not be arbitrarily raised by the developer/landlord into the future. However, the recently well-publicized incident at Andrews Lodge raises the concern that the residents in privately owned facilities for seniors, such as the one being proposed by government, may be at the receiving end of the effects of disputes that may arise between government and facility owners. This is an important issue which government should analyze before continuing with public-private partnerships.

Council wishes to note that the timeline for consultation on the *Social Assistance Act* has been very tight. This has made in-depth research and consultation a challenge. Notwithstanding the limited preparation time, we intend to share Council's perspectives about certain key aspects of the *Act*. These areas are additional to the Equality Report Card and merit fuller discussion:

**Employment** ↔ Welfare and Parents

Standard of living: A livable income

Affordable housing

Childcare subsidization

## **Employment** ↔ Welfare and Parents

On PEI a single parent (still usually the mother) with a child under the age of one year is considered exempt from the requirement that she actively seek employment at that time. The *Social Assistance Policy Manual* states that this is due to the important and critical time for child bonding which takes place in the first year. However, this is an arbitrary age. Legislation across Canada differs as to when the *tender years presumption* is applied to young mothers.

Indeed, over 80% of women with children under the age of six are in the labour force on PEI, a higher level than in any other province. Even more striking is the labour force participation of our single mothers. On the whole, it is not true that single mothers are "welfare mothers." One study from the mid-1990s showed that on the contrary, three out of four will have engaged in paid employment during the year. Yet at some point in the year, two thirds of these women had to resort to social assistance to supplement low wages or inadequate EI benefits. There is no reason to expect this situation has changed in 15 years. Notably, research in the mid-1990s also indicated the average duration on welfare in PEI for a single mother was 18 months. This turns the misguided notion that welfare is a generational phenomenon on its head. Here we cross the poverty line, where over 40% of our single-parent families live in daily uncertainty; where 70% of the total welfare case load is women with children in and 32% of these are single mothers and their children; where EI and welfare are crucial; where a few weeks paid work can make or break a family for a year.

Canada's social safety net, including the assistance granted under our **Social Assistance Act**, has actually reduced the level of poverty in Prince Edward Island. We must take note. Here in this small, hard-working province, social provisions work.

The arbitrary one-year age limit for children whose parents are in need of social assistance on PEI needs to be changed. The one-year age limit serves to exacerbate an already stressful time in young mothers' lives, when they are attempting to raise children on little money, despite their best efforts to engage in paid work, evidenced by the high labour force participation rates of single mothers on this Island.

## Standard of living: A livable income

The **PEI Working Group for a Livable Income** defines a livable income as an income that allows a family or an individual to pay their rent or mortgage and their monthly bills, buy medicine and nutritious food, use transportation and childcare, and participate in entertainment/recreation, community planning, and public policy formation. All people have the right to have a few dollars reserved for some extras and to cover emergencies. VIII

The PEI **Status of Women** is a member of the Working Group and advocates for government and community to work towards achieving a livable income for all Islanders. This means an income adequate to live in good health and dignity, whether income is from paid work, pensions, social assistance, or other benefits.

We know that the low-income cut-off (LICO)<sup>ix</sup> for a single mother and one child is \$22,139.<sup>x</sup> A single parent with one child receives the equivalent of about \$13,707 on social assistance on PEI, or about \$1,142 per month.

Based on these current PEI social assistance rates, an additional \$81 per week (\$4,216 per year) would still only cut in *half* the difference between the social assistance rate and the LICO.

Allow us to examine the real-life outcomes of social assistance rates on an Island family. Consider a hypothetical budget for a lone parent and a child on social assistance.

Recall that the average monthly social assistance benefit for a single parent and her child is about \$1,142. The Shelter Allowance for two persons has a ceiling of \$648 per month and, according to the *Social Assistance Policy Manual*, includes actual expenses for rent, heat, electricity, and propane.<sup>xi</sup>

Rents on PEI for a one-bedroom or (if a renter is really lucky) a two-bedroom apartment are between \$550 and \$700+ per month. A reasonable median rate could be \$625 per month, or \$7,500 per year. Sometimes, a recipient is fortunate to find a rental unit with heat included. However, with the cost of furnace oil these days, many landlords are not providing heat as part of the rent.

Let us suppose that the heat for a two-bedroom apartment is conservatively estimated at a modest \$200 per month for the eight months of the year that homes usually require heating; that amounts to an average of about \$134 per month, and at least an additional \$1,600 per year. Add an estimated \$75 per month for electricity, or \$900 per year.

The family has already exceeded the \$648 shelter allowance by an average of \$186 per month – with an actual shortfall of closer to \$252 during each of the eight months that require heating oil.

#### TABLE 1

#### SAMPLE SHELTER BUDGET

### Lone mother and child

\* Some estimated amounts have been rounded.

ITEM	PER MONTH*	PER YEAR*
Rent	625	7,500
Heat	134	1,600
Electricity	75	900
TOTAL COSTS	834	10,000
Maximum SA Shelter Rate	648	7,776
DEFICIT	(186)	(2,224)

The renter has already spent \$10,000 of her annual Social Assistance allocation, and her remaining actual budget is \$3,707.

Let's presume her telephone service is \$60 per month (\$720 per year), and she takes a cab or pays a friend for transportation one time a week at \$12 per return trip, or \$48 per month (\$576 per year). We can assume that clothing for the young parent and child will amount to an expense each year. Suppose this young parent spends on average about \$16 per month each for herself and her child on clothing (just about \$384 per year). These expenses come to \$1,680 annually. Together with the shelter costs described above for furnace oil, rent, and electricity, the family's expenses total \$11,680.\*

We have not considered food, sundry items for personal hygiene or laundry, possible weekly spending allowance for the child, or any kind of emergency expense, entertainment, or summer and extracurricular activity registration and equipment expenses for the child and/or the parent.

TABLE 2
SAMPLE BUDGET FOR NON-SHELTER EXPENSES
Lone mother and child

\* Some estimated amounts have been rounded.

ITEM	PER MONTH	PER YEAR
	(\$1,142 available)	(\$13,707 available)
Shelter costs (see Table 1)	834	10,000
Telephone	60	720
Transportation	48	576
Clothing	32*	384*
AMOUNT LEFT FOR FOOD	169*	2,027*
AND OTHER NECESSITIES		

The balance remaining to cover food, including school lunches, is an average of approximately \$169 per month, or \$39 per week (\$2,027 per year). Thirty-nine dollars per week for groceries for an adult and a growing child is not adequate. Further, it should be noted that during the cold months when costs for heating are higher, the amount available for food is lower, closer in fact to \$25 per week. During these same cold months, costs for fresh food ironically tend to be higher. This illustrates that it is frequently the budget for food that has the most flexibility in weekto-week and month-to-month budgetting. It is therefore often the case that social assistance recipients are forced to skimp on food or seek assistance from charities such as food banks.

Indexing social assistance to consumer price increases is an option being taken up by other provinces. It is not good enough to say that the

## **FOOD COSTS**

Some thoughts about what could be purchased with a weekly food allowance of \$39:

Two litres of 2% milk: \$3.25
Two loaves of bread: \$6.40
One dozen eggs: \$3.10
Half pound of cheese: \$3.20
Five pounds of potatoes: \$3.00

• A package of frozen mixed vegetables:

\$3.00

A can of fruit: \$1.30
A half dozen apples: \$3.00
A jar of peanut butter: \$3.50
A bag of spinach: \$3.00

A small package of dried beans: \$2.00

• A carton of molasses: \$3.00

This totals \$37.75, before purchasing protein other than eggs, cheese, beans, and peanut butter. It does not include pantry staples such as flour or rice, nor condiments or flavourings, nor any treats or desserts. Nor does this spending provide for school lunches. There is not enough money to cover nonfood household expenses such as laundry detergent, dishwashing liquid, blue bags, toothpaste, shampoo, hand soap, bathroom tissue, feminine hygiene pads, or aspirin.

CPI may not always be accurate. It certainly would be a mechanism for ensuring that assistance rates are going to be monitored and increased on an annual basis in line with the cost of living when it rises.

## Affordable housing

The PEI Government suggests that 25% of an individual's annual gross income ought to cover shelter or housing costs<sup>xiii</sup> despite the fact that almost half of single parents in Canada, most of whom are women, pay 30% or more on shelter costs.<sup>xiv</sup> Again, using the single mother of one child as an example, we know that she is expected to live on \$13,707 per year if she is receiving social assistance on PEI. This would mean that her actual housing amount should be \$285 per month, if we accept the 25% figure suggested by the PEI Government. It is highly unlikely that any person could secure a

one-bedroom, let alone a two-bedroom apartment, anywhere on PEI for \$285 per month.

The shelter allowance established by the PEI Government for two persons, in this case a parent and child, has a ceiling of \$648 per month, as discussed earlier. The shelter allowance, according to the **Social Assistance Policy Manual**, includes actual expenses for rent, heat, electricity, and propane. This really is absurd. In fact, if she is expending the realistic, hypothetical amounts estimated above for rent, heat, and lights, her "shelter" expenses represent almost 75% of her monthly income, not 25%!

Our policies must reflect realistic benefit levels that address the present state of housing in urban and rural parts of PEI. At the same time, governments must actively increase access to affordable housing for those in need, including single mothers, families with children, seniors, and unemployed and disabled individuals generally. The province must continue to partner with Ottawa to direct funds to creating safe, affordable housing for people on low incomes.

Council urges government to commit to helping low- to moderate-income homeowners to create more accessible and energy-efficient living spaces, many of which are being or will be used right through to homeowners' senior years.

The Office of Energy Efficiency has made preliminary gestures to support programs for people with low incomes, but there is much more to be done. Council congratulates the Environment Minister's recent announcement committing government to continuing energy efficient programs for Islanders in the face of federal government cancellation of its income tax-based program.

To date, there have been piecemeal approaches to the affordable housing crunch on PEI. There appears to be no long-term housing strategy, and especially needed is a strategy developed in collaboration with individuals and groups committed to social change and a poverty reduction strategy.

Certainly, there has not been a movement to address the unrealistic housing and rental rates allocated under a social assistance budget for the recipient. The PEI Government can be lauded for increasing shelter allowances for recipients by 10% in recent history, but, if anything, this highlights the fact that recipients were even worse off before and estimated rental rates on PEI were miscalculated for many years. As mentioned earlier in this paper, indexing social assistance to consumer price increases (consumer price index, CPI) is an option being taken up by other provinces, and while the CPI may not always be accurate, it is a verifiable and comprehensive way to ensure that shelter levels are rising when the cost of living does.

## Childcare subsidization – Respite relief

The PEI Government presently describes the subsidy for childcare in the following way:

Sometimes parents need help covering the cost of child care so they can work or attend training programs, or because their child has specific needs. The Child Care Subsidy covers all or part of the cost of child care in licensed daycare centres, nursery programs, family daycare homes, and at before- and after- school programs. The subsidy rate varies, depending on the size of the family and the household's income. \*vi

One of the single-most important supports for families with children is that of quality, affordable, and accessible childcare. All parents ought to have the option of placing their children in a quality childcare facility. Additionally, we have acknowledged in recent years the importance of providing respite care to caregivers of disabled persons in our society. And yet, childcare continues to be viewed as if it were an "extra" that should only be available to those who can afford it.

The single parent receiving social assistance should be entitled to respite relief when she is parenting her child or children on a full-time basis. And she should be able to choose if and when she leaves her child or children in the care of others. We simply do not understand why it is that the group who most needs this social support, the single parent, who is least likely to receive subsidies, unless she is actively engaged in paid work or training. Council urges government to expand on the childcare subsidization category to include respite care.

In 1997, Quebec introduced a program in which the maximum fee parents paid for childcare in a centre was \$5.00 per day for children between six months and five years of age. This fee was raised to \$7.00 per day in 2003. The result of this program is that the proportion of children in childcare centres has risen from 28% to 52%. \*Viii\*

On PEI, 29% of our children between six months and five years of age use childcare centres. XVIII Even without the benefit of a needs survey, we think it reasonable to assume that formal childcare costs would be a challenge to families with fewest resources. The PEI Government could take a lesson from the Quebec experience, which has managed a comprehensive, quality childcare and subsidy program for several decades, and at a time when the PEI Early Childhood Education program will be transitioning kindergarten into the mainstream school system. Council urges government to be vigilant about expanding childcare and early learning resources for parents in need.

# Recommendations - Changes Needed in the Legislation & Policy

- That government review the requirement for parents on social assistance to actively seek employment or training when their child reaches the one-year age limit, with a commitment to extending the exemption on the employment/training requirement until the child reaches kindergarten or age five, whichever comes first, and to maximize supports to recipients with children and to encourage smooth transition to and from work or training.
- 2. That government follow the lead of other provinces and index social assistance rates to ensure that assistance rates are monitored in line with the cost of living and are increased when the consumer price index goes up.
- 3. That government raise shelter allowances, not including electricity and heat, (if heat is not already included as part of the actual rental rate) under the *Social Assistance Act* to reflect the "25 percent of household monthly income standard" applied to subsidized rental rates.
- 4. That government, when entering into agreements with developers to establish housing units for seniors, individuals in need, or disabled individuals, have binding agreements to protect the rights and security of fixed and subsidized rents for residents in the event of any dispute arising between government and the developer or facility owners.
- 5. That government expands the childcare subsidy program and move towards adopting the Quebec model of universal standardized day care, in which the maximum fee parents pay for the service is \$7.00 per day per child for the care of children from six months to school age.
- 6. That a childcare subsidy policy seek to maximize options for all women, whether they be on social assistance, employment insurance benefits, in paid work, under term contract, or seasonally employed, recognizing that respite care and the decision as to whether or when a child ought to be placed in the care of others is most appropriately left to the parent or primary caregiver.

## **Endnotes**

An applicant shall be exempt from the work force or employment related training in order to stay at home to parent an infant child under one year of age.

This is consistent with other government initiatives designed to support bonding and parenting in the early developmental stages of children.

 $^{
m iii}$  In some provinces, single parents with dependent children are specifically exempted from a formal work requirement. A study on this point in 1995 pointed to a vast variation across the country, and indeed the provinces continue to adopt different age limits for the children of single parents in which the present-day Ontario age limit exemption for children of lone parents can be as low as four years. Exemptions were the case in Ontario, Nova Scotia, and Manitoba. When a province did have in place a work requirement for single parents, it exempted some on the basis of their children's age. In BC, for example, single parents with children under the age of 12 were exempted from work requirements, while Quebec had set the age limit at six. More typically, however, provinces used school age as the formal dividing line, in line with the historical Tender Years Presumption age of seven, often referred to as the Age of Reason. See the study "When Mom Must Work: Family Daycare as a Welfare to Work Option," Coalition for Better Daycare, April 2000, where it is stated that Canada's "five largest provinces now consider single parents to be employable when their children are much younger - school and preschool aged, and as young as 6 months of age for Alberta." These variations for single parents across Canada still exist today. See Evans, Patricia, "Challenging income (in)security: Lone Mothers and Precarious Employment," Paper presented at the 2009 BEIN Conference, Dublin, Ireland, June 20-21, 2008, and also, Evans, Patricia, Policy Options, May 1995, "Linking Welfare to Jobs: Workfare, Canadian Style," p. 7, and also a paper by the National Union Research, "Workfare: A Low Wage Strategy for the Canadian economy," 2000, p. 56.

The extent of welfare fraud has been estimated to be between 0.1% and 4% in Canadian jurisdictions. For instance, the number of convictions identified in a 2001-2002 study of welfare fraud in Ontario found that of the 393 convictions for welfare fraud that year, these numbers were roughly equivalent to 0.1% of the combined social assistance caseload and 1% of the total number of allegations of fraud made that year. See: Mosher, Janet, & Hermer, Joe, "Welfare Fraud: The Constitution of Social Assistance as Crime," Osgoode Hall Law School, Law Reform Commission of Canada, March 2005, p. 26.

ii The PEI Social Assistance Policy Manual states at section 4.(a):

iv Statistics Canada, Women in Canada: A Gender-Based Statistical Report, 2007.

<sup>&</sup>lt;sup>v</sup> See *Women in Canada* and *Population by Activity & Social Security Support: Prince Edward Island*.

Department of the Provincial Treasury, Province of Prince Edward Island, September 1994. The latter is a lucid and unique review of the profiles of families in each of the three PEI counties undertaken by economist Roy Spence when he was employed with the PEI Government. This type of study has not been replicated on PEI, although it ought to be.

vi Women's Reference Group, PEI, *Voices of Experience: Training and Development for PEI Women,* 1994, p. 17. New research methodology from this period, such as "spell methodology," revealed that women tend to be in and out of the labour market and will resort to employment insurance or social assistance based on what is happening in their life at the time: often, but not always, a stressful event such as loss of employment, death of a family member, birth or disability of a child, divorce, etc. Indeed, one could argue

that being poor is in and of itself a stressful event, which may have psychological and financial repercussions for the family. Contemporary research approaches reveal a great deal about the dynamics of women's poverty, such as what moves her into poverty, and what moves her out. See "The Dynamics of Women's Poverty in Canada," Canadian Council on Social Development, for Status of Women Canada: "These data suggest that a multi-faceted approach is necessary to alleviate women's poverty, one that combines specific initiatives targeted at high-risk groups (such as single mothers and older women) and initiatives that improve women's economic standing more generally." p.vii

vii National Council of Welfare, *Poverty Profile, 2007.* See also: *Population by Activity & Social Security Support: Prince Edward Island.* 

viii Presentation to Committee on Health, Social Development and Seniors, by PEI Working Group for a Livable Income, March 17, 2010.

ix We know that the other way in which we measure poverty is with the Market Basket Measurement (MBM), which was developed in Canada in 2002. The MBM was designed to complement existing low-income measures that are used to help track low-income trends among Canada's children. It was introduced in the *National Child Benefit Progress Report: 2002*. While LICO measures food, clothing, and shelter costs, the MBM measures food, clothing and footwear, transportation (public transit or a used vehicle), and other household needs (for example, school supplies, furniture, newspapers/magazines, recreation and family entertainment, personal care products, a telephone, etc. *See HRSDC, News release, May 27, 2003*. The MBM paints a clearer picture of access to livable income in PEI than does the LICO.

<sup>&</sup>lt;sup>x</sup> In statistics gathered since 2002, MBM and LICO comparisons we have found marked differences. In the most recent comparison in 2007, for instance, the poverty rate for PEI is estimated at roughly 5 per cent under LICO but at 10.3 percent under MBM. See National Council of Welfare, *Poverty Profile: Poverty Trends by Province, 2007.* But for the sake of this discussion, the point is valid that the LICO range is substantially higher than the social assistance rates on PEI. The MBM range would be higher still.

xi PEI Social Assistance Policy Manual, s. 5-1-1.

xii An adjustment is made for calculating the monthly and weekly allowance balance because the four months in which furnace oil is not required simply means that this amount is not paid out by the Department for the four-month period. The beneficiary does not receive money *in lieu* of heating money in any given month.

xiii PEI Government Website, Community Services, Seniors and Labour, under "Housing."

xiv Statistics Canada, Women in Canada: A Gender-based sStatistical Report, 5<sup>TH</sup> Ed., 2006. Table 6.11, p. 146.

XV PEI Social Assistance Policy Manual, s. 5-1-1.

xvi Ibid. under "Childcare Subsidy."

xvii Ibid. p. 17.

Bushnik, Tracey, *Childcare in Canada*, Statistics Canada, Special Surveys Division, 2004. These figures are based on the 2002 statistics gathered by Statistics Canada. The Survey reveals that in 2002-2003, 54% of Canadian children between the ages of six months to five years were in non-parental childcare compared to 42% in 1994-5.