

*Including contributions from NQIN the National Quality Improvement Network for
Early Years ¹*

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1. Introduction

National Children's Bureau is a leading charity that for over 50 years has been working to improve the lives of children and young people, reducing the impact of inequalities. We work with children and for children to influence government policy, be a strong voice for young people and practitioners, and provide inspiring creative solutions on a range of social issues. www.ncb.org.uk

NCB welcomes the opportunity to respond to this consultation. We recognise the government's commitment to extending the provision of free childcare to three- and four-year-olds of working parents. To ensure that all eligible young children have access to high quality early education and childcare that provides continuity of care, it is crucial that the implementation of the 30 hours childcare scheme is:

- informed by learning arising from the Early Implementer pilots, who are trialling new and innovative ways of extending provision;
- underpinned by a national early years workforce strategy ensuring that all practitioners working with young children are well-trained and qualified;
- sufficiently well-resourced to provide high quality early education and childcare, including for children with special educational needs (SEN) and disabilities. The funding rate should be reflective of the full range of costs incurred by providers, including workforce development and overheads.

NCB is concerned that it will not be possible to implement the 30 hours childcare scheme to the highest standard without significant investment in funding streams underpinning the delivery of places and in training and qualifications to improve the skills and attitudes of the workforce.

NCB's response is informed by the views of NQIN and NCB's Council for Disabled Children (CDC). We have chosen to focus on questions in the consultation document relevant to our knowledge and expertise.

2. Ensuring continuity of care and high quality provision for all children accessing the extended free entitlement

¹ NQIN is a closed membership group for Local Authority Quality Improvement and Early Years regional representatives and national support organisations. It provides a forum for discussion and information-sharing on issues of quality, policy and practice in EY provision. The network meets quarterly to hear from and feed into regional networks (RQINs) so is a useful mechanism for constructive two-way dialogue with the sector. The network has a strong ethos of peer support and is committed sharing innovation, best practice and finding solutions to delivery challenges in order to maintain a focus on quality improvement in early years provision.

2.1. Eligibility criteria (Q1, Q2)

NCB believes that the government should place the greatest emphasis on ensuring continuity of education and care for the child. We agree that the grace period set out in the consultation is of a reasonable length (term or quarter) to minimise disruption, and we welcome the extended grace period for children who become ineligible during the summer term. However, a registration burden may be placed upon local authorities requiring them to check and confirm eligibility of children and to give this information to providers on a regular basis. We would therefore welcome clarification on both the local authority's and provider's role in the eligibility checking process.

2.2. Flexibility (Q3, Q4, Q5, Q6)

NCB is concerned about the implications for children's well-being of extending the hours during which funded provision can be taken from 7am-7pm to 6am-8pm, as earlier opening and later closing hours will significantly disrupt the sleep patterns of many children. Moreover, children coming into the setting very early may be grouped with older or younger children and away from their key person affecting their attachment relationships. There will also be staffing implications as practitioners may have their own families leading to challenges in recruiting staff to work between the hours of 6-8am and 6-8pm.

Some providers may not receive planning permission from their local authority to extend the use of their premises beyond the core hours of the day. In addition, the extension of the minimum session length from 2.5 to 3 hours will be challenging for providers who are based, for instance, in church or village halls, as these sessions are frequently slotted in around the delivery of other community services.

2.3. Supporting young children with SEN and disabilities (Q7, Q8, Q9, Q10)

NCB welcomes the re-statement of the statutory requirements and responsibilities in respect of young children with SEN and disabilities. However, the key barriers to provision identified in the Parliamentary Inquiry into Childcare for Disabled Children, related to the costs of provision for disabled children and to the understanding, skills and expertise of the workforce. Without a clear strategy on funding and workforce development, it is hard to see what difference is anticipated in the experiences of young children, parents and carers and in terms of closing the gap in take-up of the current (15 hour) offer and the likely take-up of the extended offer.

2.4. Model agreement (Q12, Q13)

NCB consulted with members of the National Quality Improvement Network about the feasibility of a model agreement between providers and the local authority. They informed us that a template model agreement could be beneficial, particularly for nursery chains, but it should be sufficiently flexible and non-prescriptive to enable the local authority to adapt it to meet local needs.

NCB endorses the proposal that such model agreements should set out expectations in relation access for children with SEN and disabilities. The statutory requirements need to be clear, but expectations need to go beyond this and set

out what this should look like, in practical terms that parents and carers can recognise.

One additional principle suggested by NQIN members was in relation to the requirement for a local authority to secure alternative provision and to withdraw free entitlement funding from a provider following an inadequate judgement by Ofsted.

2.5. Number of providers (Q14)

NCB has concerns about the potential impact of local authorities funding up to three providers per child for the existing and extended entitlement. Young children benefit from developing close attachment relationships with the practitioners who work with them; this supports both their well-being and their capacity to learn. We have concerns that the involvement of three different providers may work against the formation of these attachment relationships and hence against the child's best interests. The impact of multiple providers risks creating more challenges for disabled young children and young children with SEN who need consistency in their relationships, and their carers must be well-informed about each child's requirements.

We recognise that capacity for the 30 hours childcare scheme will need to be increased over time, and that during the implementation phase it may be necessary for children to access up to three providers, particularly, for example, where a third provider is used during holiday periods. We regard it as an imperative that continuity of education and care is a key principle of the scheme, so we would welcome incentives to encourage the use of a smaller number of providers, and for the statutory guidance to highlight the need for providers to work in partnership to provide smooth transitions for the child. This could be accompanied by case studies.

3. Ensuring all parents can make informed decisions about childcare

3.1. Publication of childcare information (Q15, 16, 17)

NCB welcomes the duty placed on local authorities in the Childcare Act 2016 requiring them to publish a more extensive range of information on childcare provision. This will be of particular benefit to parents requiring additional support for their children. Question 15 asks about the frequency of updating childcare information for parents. At present, Family Information Services update childcare information at a rate more frequent than every six months. We recognise the importance of having relevant and accurate information that is made available to parents, and therefore recommend a termly or quarterly updating process.

It is important to ensure that parents can access information through a range of sources, and not solely online. NQIN members suggested that partners such as libraries and children's centres could be sought to ensure that parents without an online resource are able to access childcare information. A Family and Childcare Trust report² recommended that Family Information Services should draw up outreach strategies and use health visitors and peer-to-peer schemes such as

² Family and Childcare Trust (2014) [The role of Family Information Services in England in 2013/14](#)

Parent Champions to disseminate information, and for local authorities to make better use of social media channels. This would help ensure that information about childcare provision and support with childcare costs reached disadvantaged parents, including parents of children eligible to access the two-year-old offer.

We believe that the onus should be on providers to keep childcare information up-to-date and for a system to be put in place by the local authority to share this information locally. Local authorities are required to report annually to elected members on how they are meeting their duty to secure sufficient childcare. This report could provide an opportunity for discussing issues in relation to the collation and publication of childcare information.

3.2. The local offer (Q20)

The local offer requires the publication of information about 'education, health and care provision'. This would appear to include information about childcare. It is important that information, about how childcare is made accessible for young disabled children, appears in the 'local offer' and in mainstream information so that, whichever route parent-carers use, they can find it. Depending on how local authorities organise the information, this may or may not be in two separate places. It is also important that the information is available in other formats and through other routes, as discussed above.

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