

## **Wales Pre-school Providers' Association response to Select Committee recommendation on the Childcare Funding Bill**

**Please find below Wales Pre-school Providers response to recommendations in the Committee's report.**

### **Recommendation 9**

Wales Pre-school Providers Association agrees with this recommendation as this would future proof the Offer and enable any changes to the arrangement

### **Recommendation 10**

Wales Pre-school Providers Association agrees with this recommendation as it future proofs policy changes

### **Recommendation 13**

Wales Pre-school Providers Association agree with this recommendation

### **Recommendation 15.**

Wales Pre-school Providers Association agree with this recommendation. Wales Pre-school Providers Association know that early years, childcare and play providers face barriers to digital inclusion. Many parts of Wales, both rural and within built up areas cannot access internet. In addition, many are operating within premises where they cannot access the internet or cannot afford to pay for broadband and IT equipment. This results in lack of opportunity for practitioners to upskill in IT. Increasingly, providers are required to submit returns and information about their services online e.g. to CIW. If HMRC online services are to be used as Wales Pre-school Providers Association II, then this barrier must be addressed. This will then provide more opportunities for the early years, childcare and play umbrella organisations to support the sector to upskill.

### **Recommendation 20. .**

Wales Pre-school Providers Association agree with this recommendation noting that partnership working between umbrella organisations in the Cwlwm Partnership will ensure that funding achieves its aims. Funding needs to be reviewed at intervals.

### **Recommendation 21**

Wales Pre-school Providers Association agree with this as a general principle of the 30-hour Offer.

Incentives for the non-maintained sector to increase its provision of early years education will be reliant on a fair payment for this service and Wales Pre-school Providers Association agree that this should be the case in terms of making the offer attractive and accessible for parents and families.

Colocation may be in the form of different types of childcare, and innovative ways of delivery will be key in meeting the needs of families. Parental choice about what is suitable for the child should be at the centre of decision about where the Offer is taken up. Wales Pre-school Providers Association also acknowledge that there are many scenarios where children already access more than one location during the day and that this works well and is not detrimental to the child.

In terms of widening the range of providers who can deliver both elements of the Offer, it makes sense for this to be colocated where this is practical.

Wales Pre-school Providers Association agree that colocation and collaboration between providers are key factors.

**Recommendation 22.**

Wales Pre-school Providers Association agree with this and look forward to seeing the result of the Welsh Government's recent revised guidance to Local Authorities for delivery of the Foundation Phase early years education offer. We have lobbied for many years on this subject and fair payment is now key if the 30-hour Offer is to be successful.

**Recommendation 23.**

Wales Pre-school Providers Association welcome the recently published guidance for local authorities on delivery of the Foundation Phase for 3-4 year olds. We will be monitoring to see how this is implemented recognising that it is guidance and not mandatory.

**Recommendation 24.**

Wales Pre-school Providers Association agree with this recommendation.

**Recommendation 26 (also links to recommendations 27 and 28).**

Wales Pre-school Providers Association challenge this as we see the need to ensure that providers are treated fairly. Wales Pre-school Providers Association think that what needs to be clear is that providers do not take advantage of the offer by adding charges that they would not normally add but that they can charge, for example, where they do so already to provide transport or where they would normally charge for meals.

**Recommendations 29,30, 31**

We agree that an income cap of £100,000 is in place but reviewed in the future

**Recommendation 33.**

Wales Pre-school Providers Association challenge this recommendation. Paragraph 303 in the report states that schools face a barrier to providing childcare unless they form a partnership with a provider or set up a separate legal entity that can register with CIW.

Wales Pre-school Providers Association questions "additional burdensome processes" (para 304) The Committee should be aware that all non-maintained providers of the early education offer are registered with CIW and ESTYN and will receive joint inspections.

As representatives of the early years childcare and play sector, we have supported the development of the childminding and day-care regulations for many years. Wales Pre-school Providers Association does not want to see any variation in this that could result in confusion or different standards being applied. It is important to recognise that providers of early years, childcare and play services are businesses and need to adhere to the agreed standards for care. This includes all standards for care of children and the qualifications needed by the workforce who are trained in child and brain development, importance of play in development as well as

regulatory areas such as the national minimum standards, safeguarding, health and safety, employment law,

This recommendation would have an impact on the provision of childcare and could potentially result in the loss of community childcare and early years services. It might also impact on parental choice as parents may not choose to place their child in a school setting all day.

Wales Pre-school Providers Association also ask that consideration is given to suitability of premises if schools offer all day childcare. The environment needs to provide for all the child's needs where they can thrive in a space where they can play, learn, rest, chill and eat.

**Recommendation 35.**

Wales Pre-school Providers Association agree with this recommendation. This can be achieved through partnership between Wales PPA, its Cwlwm partners, and the Local Authorities. This can utilise the experience of all partners and ensure that the Childcare offer does not result in the displacement of existing provision and also that schools can benefit by inviting non-maintained providers to deliver services in school premises as well.

**Recommendation 36.**

Wales Pre-school Providers Association agree with this recommendation

**Recommendation 37**

Wales Pre-school Providers Association agree with this recommendation