

## **Wales Pre-school Providers Association's Response to the Children, Young People and Education Committee's inquiry into the general principles of the Childcare Funding (Wales) Bill**

### **Background**

Wales Pre-school Providers Association (Wales PPA) is the largest provider of membership services to the Early Years, Childcare and Play sector in Wales. Wales PPA wants to support all preschool children, their families and Early Years' Providers to give every child across Wales the best start in life

We provide our comments below:

### **1.The general principles of the Childcare Funding (Wales) Bill and whether there is a need for legislation to deliver the Bill's stated policy objectives;**

1.1 Wales PPA agrees that the general principles of the Childcare Funding (Wales) Bill will facilitate the Welsh Government's commitment to provide 30 hours a week of Welsh government funded early education and childcare for up to 48 weeks a year to working parents of 3 to 4 years olds in Wales.

1.2 Wales PPA agrees that a single national payment system using consistent eligibility criteria is preferable to the requirement of Local Authorities to each develop their own system, which could both be costly and result in inconsistencies in how parents and their families are supported across Wales to access the 30 hours Childcare Offer.

1.3 We support the benefit of using an online system. We believe that the development of robust, clear, standardised finance and administration processes for the offer are needed to make this offer viable

1.4 It should be acknowledged that access to online services varies throughout Wales and that there will be individuals who either cannot access online systems or who may need support to do so that they are not excluded from the benefits.

### **2. Any potential barriers to the implementation of the key provisions and whether the Bill takes account of them**

2.1 Wales PPA believes, that for this offer to be achievable and successful

- That the needs of the child need to be kept at the centre of all decisions about the offer. Due regard to this should be achieved through the Rights of Children and Young Persons (Wales) Measure 2011.
- That parents should have a choice on what type and how much childcare is appropriate for their child. This should not be prescribed for them.

- That sufficient funding will be needed to provide support for children who have additional needs so they and their families have equality of opportunity to access the offer.

2.2 Wales PPA knows that the current offer of a minimum of 10 hours of funded Early Years entitlement (Foundation Phase nursery) provision is not always clear to parents. Clear guidance using accessible language and explanations will be needed so that parents and carers understand that the funded Foundation Phase Nursery places form a part of the offer but will be accessed in a different way and not via the online system for the other childcare offer hours.

2.3 To prevent barriers to accessing the 30 hours childcare offer, the development of models of childcare that provide flexibility, parental choice and accessibility for 3/4-year olds will be essential to meet capacity.

2.4 The online service needs to use clear, concise, accessible language and be available in English and Welsh

2.5 There will be a range of different scenarios for working parents, e.g. self-employed, contractors, term time workers. The online service needs to be comprehensive so that it covers different scenarios and for parents to complete it easily to assess their eligibility. Access to one to one support via e-mail or phone may be needed

2.6 One possible barrier to the implementation of the 30 hours Childcare Offer is the risk of a lack of take up of the offer. This could happen for many reasons; a lack of parent's understanding of eligibility, a lack of capacity within existing childcare settings to expand their provision to meet demand or location of childcare provision. Whilst day care nurseries are generally open all year round, some of the sessional early years providers only currently operate during term time and therefore some communities will need to develop holiday care or extend services to meet the demand that may arise from this offer. The Early Implementer Authorities will be able to give an indication of how this can be managed with support from stakeholders including the providers and their membership umbrella organisations.

2.7 We also note the need to ensure that the process of re-confirming eligibility for funding is easy to understand and provides answers in a timely manner. The systems employed for re-confirming eligibility should not disadvantage parents, carers or providers

### **3. Whether there are any unintended consequences arising from the Bill**

3.1 Wales PPA agree that providing support to parents and carers who work with the cost of childcare contributes towards eliminating one of the

possible barriers to employment. In turn, this contributes to strengthening the economy and decreasing the number of children who live in poverty. We note the need to ensure that the administrative processes for delivering the scheme are clear and easy to understand.

3.2 A positive effect of this Bill to enable a consistent, streamlined accessible service will be to facilitate childcare providers may result in increased services and impact positively on sustainability in the sector as providers can reach capacity or expand services.

3.3 Alongside the need to expand provision to provide more childcare places is the requirement for more early years and childcare practitioners working in the sector. This means that the implementation of the Early Years and Childcare workforce plan will be vital with the appropriate qualifications being readily available and the Childcare Inspectorate Wales (CIW) having the capacity to register or vary registrations if demand is high.

3.4 Should the preferred option of using HMRC to administer the eligibility checks be chosen it should be available in English and Welsh

3.5 As previously mentioned under 2.1 Parents and carers need to be made aware of the local arrangements for applying for the 10 hours (or more where applicable) of funded Foundation Phase nursery provision to which all children are entitled.

3.6 Clear information will need to be provided to parents, carers and providers about how many childcare hours they are entitled to in each Local Authority area and that they have a choice regarding elements of provision such as language. If choice of language cannot be met then plans need to be in place to increase capacity.

#### **4. The financial implications of the Bill (as set out in Part 2 of the Explanatory Memorandum,**

4.1 A risk in the HMRC option could arise if policy in England and Wales should differ in the future and this should be planned for so that services are not disrupted,

4.2 it is important that the processes that are developed facilitate a timely turnaround of approval and payment so that families are not disadvantaged.

4.3 Using the HMRC option should enable some economies to be made at the set-up stage as a similar system is in place already for England. It would be essential that any technical issues currently experienced would be resolved before Wales commissions HMRC if that is to be the preferred option.

**5.The appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum).**

5.1 We agree that the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum) are appropriate.

5.2 Wales PPA will welcome continuing discussions with all stakeholders so that we. Along with Cwlwm partners can represent and support the non-maintained sector, as the regulations for the administrative and payment elements of the childcare funding are developed.