

Response ID ANON-WAXN-NKP2-S

Submitted to Childcare: Regulatory changes
Submitted on 2022-09-15 10:38:32

Introduction

About you

1 Would you like us to keep your response confidential?

No

Reason for confidentiality:

2 In what capacity are you responding to this consultation?

Select an answer from dropdown list:

Charity

If Other, please give details:

3 Where are you based in England? (PLEASE NOTE THAT THIS CONSULTATION APPLIES TO CHILDCARE IN ENGLAND ONLY)

Please select your region from the drop down list:

4 If you are responding on behalf of an organisation: what is the name of your organisation?

Please type your answer in the box:

The Women's Budget Group (WBG)

5 If you are responding on behalf of an organisation: what is your role within this organisation?

Select an answer from the dropdown list:

Other

6 If you are responding on behalf of an organisation: how many people are employed by your organisation?

1-24

7 If you represent any other type of organisation: what is the nature of your organisation?

Please type your answer in the box:

The Women's Budget Group is a independent and not-for-profit membership network consisting of women's voluntary organisations, academics and policy expert whose aims are to promote a gender equal economy. We do this through conducting in depth analysis of the impact of policy on women. Our analysis has been used to influence policy debates on a national and local level.

8 If you are a parent or carer for a child: how old is your child/are your children? (Select all that apply)

9 Which forms of childcare do you currently use? (select all that apply)

Staff: Child Ratios

10 Do you agree or disagree with the proposed change to the current statutory minimum staff:child ratios in England for 2-year-olds from 1:4 to 1:5?

Please explain your rationale for this view in no more than 300 words.:

We strongly disagree. High quality early education is strongly linked to high adult to child ratios. Since COVID studies have highlighted the increase in the educational attainment gap between poor children and their wealthier peers (<https://www.suttontrust.com/wp-content/uploads/2020/04/COVID-19-and-Social-Mobility-1.pdf>). High quality early years is vital in addressing this gap before children start school. Increasing the number of children that each adult is responsible for decreases their ability to create child-centred, personalised interventions that support every child's development and identify opportunities for early intervention and support.

The Early Years sector is facing a staffing crisis. Large numbers of professionals are leaving the sector due to the low pay/ high stress working environment. The government's own research (<https://www.gov.uk/government/news/stability-of-the-early-years-workforce-in-england-report>) shows that one in eight childcare workers earn below £5 per hour with 45% relying on state benefits to supplement their income. It is irresponsible to implement a policy that will increase the pressure on a workforce that is already in crisis (<https://www.theguardian.com/money/2022/apr/03/easing-nurseries-staffing-ratio-in-the-uk-would-be-childcare-disaster>). Comparisons with ratio's from

other countries can be extremely misleading as the way in which adults are counted is not consistent (https://read.oecd-ilibrary.org/education/education-at-a-glance-2021_cff1a120-en#page5).

Rather than small tweaks that risk further damaging an already fragile essential service, we advocate for an independent comprehensive review of early years education and care, working with stakeholders including children's rights organisations, parent's groups, early years professionals and their unions, childcare providers, employers and local government. It will be vital for government departments with responsibilities for education, business, leveling up and gender equality to engage with this independent review as all these departments have a stake in a high quality, affordable, accessible and sustainable early years sector.

Proposal B and C: Childminder settings

11 Do you agree or disagree with Proposal B to change the EYFS wording on childminders' ratio flexibility for siblings?

Please explain your rationale for this view in no more than 300 words. :

We disagree. High quality early education is strongly linked to high adult to child ratios. Childminders provide education and care and must be supported to do so. Research for the Department for Education found that 70% of childminders have earnings at or below the national living wage (Frontier Economics (2019) Providers' finances: Evidence from the Survey of Childcare and Early Years Providers 2018). The childminder workforce has been in rapid decline in recent years (<https://childcare-during-covid.org/final-report-essential-but-undervalued-early-years-care-education-during-covid-19/>). We would suggest that interventions that seek to retain the childminder workforce are better focused on supporting their financial sustainability and access to affordable training and support, rather than increasing the number of children that they will have with them at any time.

Childminders are an essential part of the critical social infrastructure that is early education and care. Rather than small tweaks that risk further damaging an already fragile essential service, we advocate for an independent comprehensive review of early years education and care, working with stakeholders including children's rights organisations, parent's groups, early years professionals and their unions, childcare providers, employers and local government. It will be vital for government departments with responsibilities for education, business, leveling up and gender equality to engage with this independent review as all these departments have a stake in a high quality, affordable, accessible and sustainable early years sector.

12 Do you agree or disagree with Proposal C to change the EYFS wording on ratio flexibility for childminders' own children?

Please explain your rationale for this view in no more than 300 words. :

We disagree. High quality early education is strongly linked to high adult to child ratios. Childminders provide education and care and must be supported to do so. Research for the Department for Education found that 70% of childminders have earnings at or below the national living wage (Frontier Economics (2019) Providers' finances: Evidence from the Survey of Childcare and Early Years Providers 2018). The childminder workforce has been in rapid decline in recent years (<https://childcare-during-covid.org/final-report-essential-but-undervalued-early-years-care-education-during-covid-19/>). We would suggest that interventions that seek to retain the childminder workforce are better focused on supporting their financial sustainability and access to affordable training and support, rather than increasing the number of children that they will have with them at any time.

Childminders are an essential part of the critical social infrastructure that is early education and care. Rather than small tweaks that risk further damaging an already fragile essential service, we advocate for an independent comprehensive review of early years education and care, working with stakeholders including children's rights organisations, parent's groups, early years professionals and their unions, childcare providers, employers and local government. It will be vital for government departments with responsibilities for education, business, leveling up and gender equality to engage with this independent review as all these departments have a stake in a high quality, affordable, accessible and sustainable early years sector.

Further options for ratio reform

13 (For childcare providers) What are your views on having the following flexibility for 3-4 year-olds in your provision? Where children aged 3-4 are attending a setting for less than 4 hours per day, the ratio of 1:8 can be increased to 1:10 (as in Scotland), although where staff are qualified to Level 6, the ratio of 1:13 would continue to apply.

Please give your views in no more than 300 words. :

We strongly disagree. High quality, accessible and affordable early childhood education and care is essential social infrastructure, with the potential to deliver significant leveling-up benefits for children, families, the economy and wider society. High-quality childcare

- helps to narrow the attainment gap between children from economically disadvantaged backgrounds and their more advantaged peers, reducing inequalities and creating benefits that last throughout a child's time in school and beyond.
- removes barriers to employment, particularly for women, who are still disproportionately responsible for unpaid care reducing the gender pay gap and improving household incomes.
- creates low-carbon jobs which are distributed in a more equal way geographically than in other sectors due to the need for childcare in every town and city across the country.

This is the first generation where the majority of children will attend some form of early education or care provision. There is not enough childcare in the UK, and what is available is expensive, inflexible, and sometimes lacking in quality. This is particularly true in deprived areas where high quality childcare can be most beneficial. Furthermore, underfunding for government 'funded hours' schemes is leading to widespread closures of settings and poor pay and conditions for workers. Childcare in England, in its current state, does not serve the child, the parent, the worker or the wider economy. Without reform, providers will continue to close, staff will continue to exit the profession, fees will continue to rise, and the attainment gap for disadvantaged children will continue to widen. We advocate for an independent comprehensive review of early years education and care working across government departments including Leveling Up, Housing and Communities, Education and Business, Energy and Industrial Strategy.

14 What further flexibilities would you consider adopting to deliver your provision? (Select all that apply)

If you selected 'Other', please provide details in the box below, in no more than 300 words. :

Adequate supervision while eating

15 Do you agree with the proposal to make paragraph 3.29 of the EYFS explicit that adequate supervision whilst eating means that children must be within sight and hearing of a member of staff?

Yes

16 Please explain briefly your views about this, including if you foresee any unintended consequences for early years providers as a result of this change.

Please explain your views in no more than 300 words. :

Further comments

17 What are your concerns (if any) about how the proposals may affect you or individuals in your organisation with protected characteristics?

Please give your answer in the box below, using no more than 300 words. :

The Consultation needs to consider the impact on everyone with protected characteristics, not just those represented by organisations.

Children have the protected characteristic of age and the impact on them must be considered. Changes in ratios would potentially have a negative impact on disabled children. In the Coram Family Childcare Survey (2021) they report that a third of local authorities reported a reduction in the number of children with SEND using childcare (a third of local authorities reported a reduction in the number of children with SEND using childcare). 92% of mothers say finding childcare for disabled children is more difficult compared to non-disabled children (https://contact.org.uk/wp-content/uploads/2021/03/childcare_affordability_trap_research_june_2014.pdf). The impact of ratio changes on BAME children must also be considered because they experience a higher risk of poverty.

The early years workforce is 98% female and among the lowest paid in the labour market (<https://wbg.org.uk/analysis/uk-policy-briefings/childcare-gender-and-covid-19/>). Women have the protected characteristic of sex and a large proportion of this workforce experience in-work poverty. It is important to consider that any changes to childcare disproportionately impact mothers with the protected characteristic of sex. 94% of parents who changed their working patterns after having children say childcare costs were a factor in that decision, and 73% said they had had difficulty finding appropriate childcare that met their needs including 80% of single parents and 80% of those with a BAME background (<https://www.mumsnet.com/news/mega-survey-of-uk-parents-shows-that-childcare-is-failing-families>).

18 How would you mitigate against these concerns in your organisation?

Please give your answer in the box below, using no more than 300 words. :

19 Are you content for us to use your comments in any reporting? Comments will be anonymised.

Yes

20 Would you be happy for the Department or a research body working on its behalf to contact you to discuss your response to this consultation? If you agree, your personal data and responses to the consultation will be shared to allow them to contact you about your response.

Yes

21 {If willing to be contacted} For us to contact you about possible additional research, we need a named contact, email address and telephone number. Please provide these in the boxes below.

Please insert a contact name:

Mary-Ann Stephenson

Please insert a contact email address. :

maryann.stephenson@wbg.org.uk

Please insert a contact telephone number. :

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