

**Scottish Women's Convention response to:**

**The Scottish Government Consultation**

**"A Blueprint for 2020: The Expansion of Early Learning and Childcare"**

**July 2018**

**The Consultation**

In order to ensure that the funded early learning and childcare entitlement is delivered in high quality settings, the Scottish Government (SG) will introduce a new, and more progressive, service model in 2020. This will be built on a Funding Follows the Child approach, a key aspect of which will be a 'National Standard' that all providers wishing to deliver the funded entitlement will have to meet.

The Scottish Government, COSLA and local authorities have worked in partnership, through a Service Models Working Group, to develop the details of this new model. This has included engagement with providers and key stakeholders since October 2017 so that we can ensure that this new model works for everyone in the sector and helps to improve the early learning and childcare experience for our young children.

This sets out the Funding Follows the Child approach and seeks views on the proposed National Standard that underpins it. The National Standard sets out the clear and consistent criteria that all providers who wish to deliver the funded entitlement will have to meet from 2020.

**The Scottish Women's Convention (SWC)**

The Scottish Women's Convention (SWC) is funded to engage with women throughout Scotland in order that their views might influence public policy. The SWC uses the views of women to respond to a variety of Parliamentary, Governmental and organisational consultation papers at both a Scottish and UK level.

The Scottish Women's Convention engages with women using numerous communication channels including Roadshow events, Thematic Conferences and regional contact groups. This submission provides the views of women and reflects their opinions and experiences in a number of key areas relevant to accessing flexible and high quality childcare throughout Scotland, taking in mind the range of different establishments that could provide this and the unique challenges in terms of rurality and urban locations.

## 1. What factors should be considered in developing a simple, standardised yet flexible process for becoming a funded provider?

Approaches should look at determinability and availability within an area in terms of when providers can apply in order to gain funding. Notably, in locations where there is less flexible childcare, if parents cannot get into a nursery that may be closer to them because the provider must wait for the process to begin, they may not apply at all. Processes in which providers must wait a stipulated amount of time means some women may lose access to funded care meaning children and parents do not benefit. This can be a problem in areas where women may need childcare the most in order to access education and employment. This can also be a direct caveat in encouraging uptake for eligible two year olds and should be addressed for those parents.

At present, many women note that public provision tends to be of a higher standard than private for a number of reasons including higher qualifications and remuneration of staff which in turn leads to increased morale and reduced turnover, ensuring staff and children build trusting and quality relationships. There is also the caveat that local authority run providers are not profit organisations thus this was seen to weigh heavily with women in a range of areas as being suitable as costs would not be cut to ensure higher money making.

In considering a simplified approach, sustainable funding rates should be set out clearly and scrutinised to ensure adequacy and fairness. Locally set rates should show reasons and determinations for this. This should also include input from providers across the childcare landscape including evidence from childminders to ensure higher uptakes, most notably in rural areas where access to organisations may be limited and childminding is the only option.

In addition, guidelines around applying for funding should be simplified and distributed locally, including benefits of becoming a funded ELC provider. Training should also stress need for high quality provision within these organisations as well as attempts to show community diversity and the need for flexibility in care.

As Local Authorities will also be responsible for assessing and monitoring compliance with the national standard, clear cut guidelines for potential providers should emphasise the criteria for monitoring and how these will be evaluated. This should also include information and support about inspection grading and compliance with the Care Inspectorate. A notable form of guidance across local authorities should also take into account directions for over subscription and how children are guaranteed places in ELC funded provision, including quality care for those from deprived backgrounds and additional support needs.

## 2. What are the key shared principles that should underpin an effective and positive partnership between local authorities and funded providers?

Ensuring partnership working is key to not only producing short term outcomes for children but also longer achievements in terms of closing educational attainment gaps and health. A commitment to equality and diversity of workforce that reflects the community should underpin the defined principles including training around diversity issues and commitment to sensitivity to intersectional traits when advancing high quality care for children. Clear

principles need to emphasise eligible 2 year olds and how their learning may differ as well as children with extra support needs.

In terms of childminders, obligations should underline increased flexibility in terms of attending meetings and courses given that many of these in this form of employment work solely alone and may not garner as much flexibility as others.

Other comments from women have included incorporating a streamlined and effective process where provider queries can be dealt with effectively and successfully to ensure there is no hold up in processes. This should also include directions for support from both the local authority and care inspectorate in producing high quality and flexible childcare that benefits children, parents and workers.

Principles should also be underpinned by the Child Outcomes including sharing of best practices and indicators and achievement of these with an emphasis on closing the attainment gap.

Publishing best practice approaches between Local Authorities and current funded ELC providers, including qualitative case studies from those across the spectrum and parents was seen as a way of ensuring principles not only reflect best outcomes but also encourage providers to access funded childcare provision.

[3a\) We are proposing that the National Standard includes a qualification requirement for childminders delivering the funded entitlement to be qualified or to be working towards the same qualification level as is required for an ELF practitioner \(SCQF Level 7\). What are the advantages of including this criteria?](#)

Qualification requirements for childminders may have the advantage of bolstering business in that it allows placement on the same level of quality. The majority of the childminding workforce are not only sole traders, but also women, and the unique barriers they face in gaining qualifications must be recognised. For instance, many of these women are also parents themselves. This means that as well as working they may have limited time to study, especially if classes are during weekdays when they are working. There also must be increased sharing of best practices and support for those in this employment. Given that many work solely alone, this can often mean that many do not have the same continuous contact and support from local authorities and groups to gain details around funding and time off. Support networks should be encouraged where participation allows these women to be given help and advice.

[3b\) Are childminders able to access adequate funding to pay for training to SCQF level 7? Are childminders able to access training to SCQF level 7 in a way that is flexible enough to continue to allow them to run their businesses?](#)

Whilst it is welcomed that the consultation provides an underscoring to look into finance and flexibility arrangements for childminders in order to access courses relevant to childcare, suitable and accessible ways of doing so must be recognised. This includes looking into

provision of home study, particularly for more rural and harder to reach areas where education institutions may be further afield.

Given the small take up of ELC by childminders for funding, there should be suitable resources set aside in order for them to partake in adequate training. Strategies are also required in signposting parents to the high quality of care that childminders give children which emphasise the breadth of experience and quality these women have.

It must also be stressed that whilst in other ELC settings the makeup of the workforce is usually younger women, women have noted that childminders tend to be older as well as mothers themselves. This is especially the case in rural communities. These women may need extra support and resources for gaining qualifications as well as the gendered obstacles such as sandwich caring and health problems. Bursaries should be allocated specifically for child minders gaining qualifications which take into account other factors such as transport and time spent away from employment in order to do so.

#### [4. Our aspiration is to see outdoor learning and play becoming a defining feature of ELC in Scotland.](#)

##### [Does Criteria 3 \(physical environment\) capture this ambition? If not, how can it be strengthened in a way that is suitable to providers?](#)

Outdoor learning is something that women have been extremely positive about for the skills and creativity it brings to children alongside the numerous health benefits. Urbanised areas may especially benefit from enshrining this criteria, given that many children's access to outdoors may be limited due to living in flats, for instance in busy and congested areas.

##### [What challenges, if any, exist for funded ELC providers to ensure children have access to outdoor play? How can these challenges be overcome?](#)

Whilst women have welcomed the commitment to enshrining the importance of outdoor education in the early years for young children and the range of benefits this has, exceptions must be made for settings where there may be lack of space or safety around children gaining outdoor access. This could be overcome by extra provision to involve trips outdoors.

Additionally, there are some problems which may arise for the likes of children from more deprived backgrounds who may not have suitable provision in terms of adequate outdoor clothing and footwear. Encouragement and advertisement of initiatives such as The Daily Mile should be encouraged to extoll the health benefits of outdoor activity for children as well as required training for staff in this unique environment.

#### 5a) Will the criteria set out in the draft national standard:

##### Ensure that high quality, accessible, flexible and affordable Early Learning Childcare is delivered in all funder provider settings?

It is welcomed that the draft incorporates and lays out equality of access for the differing needs of children. However, this should also take into account the unique geographical layout of provision in rural areas and the differences that categories these in themselves. This in itself gives birth to a series of underlying factors such as transport resources and flexibility.

Additionally, provision for the real living wage should incorporate all staff, not just those undertaking funded roles, as well as security of employment and trade union rights in order to bolster staff morale and ensure children access the highest quality provision possible. Given that contact with staff is one of the most fundamental areas in quality, this should be treated with the highest priority. Not only does this benefit staff and productivity, it also reassures parents that their children are in the best possible settings. This should extoll the benefits of the real living wage for the organisation when it is implemented across the board.

##### Support increased choice for parents and carers?

Additional recommendations around improving flexibility in order to achieve women gaining access to increased employment and education aspects should be looked at in terms of the benefits this will have on their children. This should include emphasising under flexibility the range of employment options that parents may undertake and guidelines that consider parents in precarious working conditions such as zero hour contracts.

##### c) Do the proposed criteria within the National Standard seem fair and proportionate for all? Do the proposed variations for some criteria seem fair and proportionate for childminders?

Whilst it is welcomed to have contingency plans in place for childminders, this should be guided by local authority planning and be given full support. Given that childminding has relatively low uptake around funded ELC in comparison to other forms, the utmost support and guidance must be in place including increased flexibility and remuneration where needed to provide the highest quality of care.

#### 6. What areas would you look to be addressed in the technical guidance note for supporting implementation of the ELC living wage commitment?

A code of best practice would be beneficial for living wage entitlement. As stated in the consultation, a commitment to paying this illustrates the quality of care delivered by staff and improves productivity and staff retention levels. It is not only unfair that this potentially could be delivered solely when providing funded ELC care, but also may lead to confusion in wages for staff dividing time between providing funded and non-funded hours. Comments have included the likes of the development of a national certificate to show a certain provider is incorporating living wage commitments which can then be displayed. Women have often noted the preference for local authority run nurseries over private with the emphasis on profit margins and real living wage commitments being a main reason for this. Ensuring all staff are paid a decent salary should be looked at as a way to bolster business within the

organisation. The commitment must also underscore the fact that the real as opposed to national minimum does not discriminate per age band meaning all staff are paid equally and fairly for work. In a sector in which young females predominate, it is unfair they may not be treated the same as fellow employees.

7. Should newly established ELC settings be able to deliver the funded hours on a probationary basis, pending the outcome of their first inspection, provided they meet all other aspects of the National Standard? Are there any particular challenges or issues that may arise from this approach?

Giving new ELC settings probationary basis is seen as a beneficial way of increasing flexibility and access to childcare for women, rather than having to await the potential outcome of an inspection. This also allows establishment's adequate time to gain support and guidance that may be needed to ensure inspections gain high quality results to put parent's minds at ease.

8. What support will service providers require to prepare for the introduction of the National Standard and meet the criteria and delivery of the new service model?

Support for provider's in order to ensure the highest quality standard should include clear established guidelines that are appropriate for a particular area, bearing in mind particular challenges some establishments may encounter in terms of location. Additionally, incorporation of best practices around staff retention including suitable wages and development outcomes should be relayed to newly funded ELC settings should be relayed. Women have also noted that case studies showcasing success where funding has been delivered well in the local authority should be highlighted, potentially with managers of these acting as guides for new settings.

### Conclusion

The SWC welcomes the opportunity to comment on and have women's voices heard in relation to the expansion of funded ELC in Scotland. In particular, the establishment of national guidance to ensure a joined up approach that takes into account the unique challenges that women face throughout the country as well as establishing strategies and best practice from local authorities is crucial to ensure the most flexible and accessible childcare strategy.

For further information, please contact

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