

**Section 2: National standard for funded early learning and childcare provision**

**3a We are proposing that the National Standard includes a qualification requirement for childminders delivering the funded entitlement to be qualified to or working towards the same qualification level as is required for an ELC practitioner (SCQF level 7).**

**What are the advantages of including this criteria?:**

Many parents value the flexibility and quality service that childminders offer and feel this is not recognised in the current system. Specifying a qualification level would recognise this quality and give childminders a parity of esteem. However, parents are not entirely convinced this is necessary for very experienced childminders. It seems somewhat bureaucratic to ask them to return to study for a qualification when they have years of experience.

**4 Our aspiration is to see outdoor learning and play becoming a defining feature of funded ELC in Scotland.**

**How could it be strengthened in a way that is sustainable for providers?**

The criteria captured the ambition to a degree but we feel sub criteria 3.2 could be stronger: accessing and experiencing outdoor play is not intrinsically better than indoor play, it is the quality that is key. Staff must be adequately trained so that it is not merely the same indoor experiences that are being replicated outdoors.

For outdoor play to become a defining feature it must be truly valued by all involved. The Curriculum for Excellence (CfE) calls for a broader learning experience, including active learning and learning outdoors. Outdoor learning, exercise and play benefits young children’s health and well-being, as well as their physical and cognitive development. Although policymakers and nursery staff may understand the benefits, there are parents who will not yet fully understand or appreciate the value of outdoor learning. Unfortunately, the only information many parents have had about learning and CfE is through negative portrayals from the mainstream media. These parents may resist the proposed approach for their child, believing it will delay their child’s literacy and numeracy development.

Scottish Government’s Quality Action plan (action 11) committed to guidance for families to be prepared for March 2019; this is an opportunity to fully explain the benefits of outdoor learning and play and generally raise awareness. The guidance should include clear information about what is available to parents locally, and how they can access it, as well as fully explaining the benefits of the options.

**How can these challenges be overcome?**

There are further challenges in providing outdoor play, but none are insurmountable. These include: provision of suitable clothing (for both children and staff) , including children with additional support needs (ASN) and finding suitable space (including offering a range of environments),.

Finding outdoor space for ELC settings can be difficult, particularly in cities. When large scale developments are planned, there is a requirement to assess whether there is sufficient capacity within primary and secondary schools in the area, and where there is not, to make a suitable contribution under section 70 to contribute to expansion or other community gain. We agree with Parenting Across Scotland’s suggestion that this should be extended to ELC so that an assessment is made as to whether existing provision is sufficient to meet the needs created by the development and, where it is not, a contribution is made.

Dependent on location, it may be more or less straightforward to offer children a ‘range of environments’. For example, if the ELC setting is within walking distance to a river, beach or woodland this would only have implications on staffing ratios. For very urban settings however, this could involve considerable transport and there may be cost implications for parents, as well as the pressure on staffing ratios within the setting for a longer period of time.

Children require suitable clothing to be able to participate in outdoor learning in Scotland (for example waterproof jacket, gloves, wellies, sunhat). We would like to see the new national minimum school clothing grants expanded to allow for a payment to buy suitable nursery clothing for children to fully participate. We would hope that all local authorities provide Cost of the School Day guidance for their nurseries. Clothing costs are a particular concern for parents. Any clothing required should be widely available at low cost, for example in supermarkets or provided through the ELC setting. Other good practice in schools which could easily be replicated in nurseries are ideas such as having an easily accessible rail of clothing donated by parents.

Parents often tell us that children with ASN are not adequately included in outdoor activities. In particular, staff may need training on how to fully include children with physical disabilities in outdoor play and settings must be inclusive. When current budgets do not allow for adaptations to outdoor space or staff do not have the skillset, Scottish Government should promote the Early Learning Childcare Inclusion Fund to nurseries as a way to achieving this.

**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 funded provider settings?**

Don't know

**Please explain your answer.**

We welcome the criteria set out in the draft National Standard and think this has the potential to provide a baseline to ensure that high quality, accessible, flexible and affordable ELC is delivered in all funded provider settings. However, this depends in part on the stringency and capacity of local authority staff in monitoring. The inevitable variation in this monitoring will result in variation in settings themselves and detract from the ‘National’ nature of the standard. It is also vital that the authority obtain the views of parents as part of their monitoring checks. Although there is an opportunity for parents to share their views and experiences as part of the inspections process, these inspections are several years apart and many parents will not get the opportunity to comment due to the relatively short term nature of nursery provision.

We would be happy to work with Scottish Government on guidance for authorities on good consultation with parents.

As in schools, parents want staff to be free to work with the children and not overwhelmed with a huge amount of paperwork. We feel strongly that monitoring and reporting, while clearly important, should be done in a non-bureaucratic and straightforward fashion.

Criteria 1- Staffing, leadership and management - We welcome the inclusion of this criterion, as high quality staffing is clearly key for ensuring quality. However, we share the concerns of Parenting Across Scotland on sub criteria 1.3 where staff ‘must have either obtained the benchmark qualification for their role, or if they are within their first 5 years of registering with the SSSC, have started working towards this’. This could result in a situation where a setting does not have any fully qualified staff, which no parent would find desirable. It would be appropriate for parent representatives to be included in the recruitment process for senior staff, as with school interviews currently, to ensure some consistency with arrangements in schools. We would welcome another sub criteria to ensure parents are involved in the process.

Criteria 2- Development of children’s cognitive skills, health and wellbeing-  We agree this criterion seems correct but, as previously discussed in question 4, parents need more information on how children learn and how their ELC setting is providing a suitable experience. A recent YouGov survey commissioned by NPFS indicated that parents (with children aged 3 to 18) do not have a full understanding of CfE: just 58% understood why the four capacities of CfE are of equal value, and only 49% said they understand how all of their child’s learning fits into each of the four capacities. It is our opinion that knowledge of CfE should start in the early years and be built on as a child progresses through their education.

Criteria 3- Physical environment - As discussed in Question 4.

Criteria 4- Improvement planning-  While this criterion seems fair, the sub-criteria do not seem to be entirely consistent with the current focus of Scottish Government on empowering school communities, encouraging staff to work collaboratively with their parents and specifically to collaborate on matters such as improvement. This should be reflected in the National Standard.

Criteria 5- Accessibility - We are clear that this criterion is vital. However, there is a fear that in naming particular examples, local authorities will refer only to those examples. Accessibility must be for all, not applicable to only particular barriers and budgets must be made available from local authorities to make this work in practice. Having some form of need should not limit choice and flexibility for families but in the current economic climate we fail to see that this will not be inevitable.

Criteria 6- Business Sustainability-  We agree that this criteria is vital. It can be very upsetting for children and families to have to move ELC settings. Parents using partner providers have told us how stressful it is when there is uncertainty over whether a funded place will be available.

Criteria 7 – Fair work practices - Parents want to see a high quality workforce in ELC settings and many struggle with the disparity between ELC and teaching salaries, given the importance of the Early Years. We are pleased to see some effort to address this but are unsure if it goes far enough. The fair work practices that are actual legal requirements for employers (such as avoiding maternity discrimination) should be removed from the Standard, as it gives the impression that they are ‘benefits’. Settings should be able to demonstrate these without question.

Criteria 8 – Payment processes - This criteria is vital for inclusion. We are pleased to see that hours will be free at point of access, as many parents currently using partner providers tell us they find the current system variable and complex. Any additional charges must be made clear to parents in advance and these should be kept to a minimum. Families must be able to budget for any expenses. Local authorities or individual settings should consult with parents on the most appropriate systems for payment of additional charges in their areas. When systems for payment of additional charges, such as Parent Pay are utilised, local authorities and providers should provide support for those who need it and absorb any charges for these services, rather than pass them on to the parents.

Criteria 9 – Food - We welcome the development of guidance around the provision of food and feel that what is being said in this criterion meets the need. Once more information for parents is required. Families should be clear on what food their child will be eating when in the ELC setting, and consulted on menus wherever possible. Food is also a fantastic way of involving parents in the ELC setting. For example: inviting parents in for a lunch or coffee morning with the children; holding a bake sale that the children run to learn about both cooking and money; bringing parents in to share recipes and cook with the children.

**Please explain your answer.**

We are not convinced that the National Standard will result in a dramatically increased choice for parents and families. Working families will still require wrap around care so will have to choose settings accordingly; for many families geography and physical distance to settings will limit their choice. Some parents have told us that they do not believe 1140 hours of ELC is entirely necessary for their child and do not feel the optional nature of the offer is being made clear enough. They also have concerns that their desire for a ‘part time’ place will limit the choices available. We would remind Scottish Government that in the efforts to increase choice for those desiring more hours, this must not be to the detriment of others. Furthermore, there is no mention throughout the criteria of supporting learning in the home. Research has shown that around 80% of the difference in how well children do at school depends on what happens outside the school gates (Rabash et al, 2010; Save the Children, 2013). The role that parents play in providing learning opportunities at home and linking with educational settings is therefore critical. This is an equally important aspect for those who take the full 1140 hours, and those who choose to take fewer hours.

There also need to be checks and balances to ensure local authorities do not manipulate this choice. For example, parents in rural settings tell us anecdotally currently that local authorities have funnelled resources into particular nurseries making them more attractive to parents, this then puts the less favoured schools in rural areas at risk. This tactic allows authorities to achieve school closures by other means and this is of huge cost to rural communities.

**5b Is there any criteria not included in the National Standard that is required to ensure a high quality service is provided to all children?**

Yes

**Please explain your answer.**

Currently there is no clear requirement for any degree of parental engagement within the model. The more that parents engage in their child’s learning, the more likely it is that they will help raise their child’s attainment. What parents do with their children at home and throughout their education is more significant than any other factor open to educational influence (Desforges and Abouchaar, 2003). Parental and family engagement has a greater influence on children and young people's attainment than their socio-economic background, parents’ educational attainment, family structure or ethnicity. It is therefore vitally important that families are continually supported to understand and fulfil their crucial role in shaping and supporting their children’s attainment. We would welcome parental engagement to be considered as standalone criteria and feel this would be much more consistent with the focus of Scottish Government on empowering school communities. At the bare minimum, parental engagement should be considered within the criteria as discussed in our responses, in terms of meaningfully consulting with parents, providing clear information so they can make informed choices, and providing information and opportunities for families to support their child’s learning both at home and in the setting. The NPFS is disappointed that the Education (Scotland) Bill is not being introduced to parliament as it covered parental engagement in the early years issues. However, we look forward to working with Scottish Government and Cosla to progress their agreement that the principles of parental involvement and engagement extend to early learning and childcare settings, but with appropriate flexibility to reflect the particular context.