

Response from Glasgow Council for the Voluntary Sector (GCVS) to Scottish Government Consultation on ELC Service Model for 2020

June 2018

Introduction

Glasgow Council for the Voluntary Sector (GCVS) has over 600 members, and is recognised by the Scottish Government as the core partner in the Glasgow Third Sector Interface, with responsibility for providing a wide range of development support and technical services to voluntary and community organisations across the city.

The GCVS 'Everyone's Children' project gives support to Third Sector organisations in Glasgow that provide services to children, young people and families. The project is funded by the Scottish Government and works in partnership with statutory partners and the Third Sector.

GCVS and Everyone's Children are pleased to offer comments on the **ELC Service Model for 2020 Consultation**. The 'Everyone's Children' project was primarily set up to promote and support Getting It Right for Every Child (GIRFEC) policy, and to deliver training and support to third sector organisations.

The project recognises the importance of the expansion of Early Learning and Childcare and has worked with third sector childcare providers over the last 18 months to support them to enhance the services they provide. This has included:

- Research into the needs of third sector childcare organisations
- A targeted daytime and evening programme of training and events, to meet the needs identified
- Establishing and supporting a third sector ELC sub group of the Citywide Forum, to bring third sector ELC providers together, share good practice and discuss areas of common interest.
- Providing business and capacity building support through Organisational and HR health checks

We welcome this consultation on the principles of 'Funding Follows the Child and a National Standards framework. Our response below is informed by the views of third sector childcare providers expressed at the recent Scottish Government consultation meeting and at other recent meetings with the sector.

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

The process should be accessible and provide clear guidance in plain English to let providers know what their responsibilities are and what they can expect from the local authority. Consideration should be given as to how applications will be received, to provide a choice of online and hard copy forms.

Efforts should be made to reduce bureaucracy and the local authority could take responsibility for verifying that the criteria are met, where possible, in order to reduce the burden on providers. Local authorities should be encouraged to invite funded providers to a meeting in person to explain the process and allow managers to ask questions to ensure there is no confusion or uncertainty.

Question 2: What are the key shared principles which should underpin an effective and positive partnership between local authorities and funded providers?

The relationship should be closer to a true partnership. Currently, third sector providers say that they have a purchaser/provider relationship. They are not involved in designing the service or consulted on how it operates. They feel that they are treated as a 'second tier' of provision behind council nurseries.

Local authorities should recognise that third sector providers are also highly skilled and qualified and often support vulnerable and struggling families; they have their own experiences and insights which other providers may benefit from hearing. Third sector funded providers should also be extended the same resources and training that the local authority makes available to its own staff.

While a true equal partnership may be impossible as ultimately the local authority controls funding, efforts should be made to arrive at a less uneven relationship where both the authority and the funded provider understand what their own responsibilities are and what they can expect from each other.

The current standard includes a requirement on providers to commit to ongoing and constructive communication with the local authority, but there should be a corresponding requirement that the local authority must be easily contactable and responsive when funded providers require support.

The local authority should also make efforts to pay any subsidies that funded providers are entitled to in a timely manner to avoid a negative impact on the cash flow of organisations. The rate paid to funded providers should reflect that third sector providers may have differing costs due to paying rent and bills for their premises.

Glasgow City Council has traditionally subsidised places at its own nurseries, with the result that the cost burden for parents is less than for those whose children attend third sector funded providers. The proposed new system for discounted childcare rates in Glasgow only applies to council-owned nurseries. This is not a provider neutral approach as it restricts choice for lower income parents and puts third sector providers at a disadvantage, particularly when they are already making efforts to keep costs to parents as low as possible, despite being in a difficult financial position.

Question 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?

We recognise that childminders are already providing high quality childcare, as information from the Scottish Childminding Association shows that over 90% receive 'good' or better grades from the Care Inspectorate. All the childminders in the Glasgow pilot have or are working towards SVQ level 3. This is beneficial for childminders as it allows them to demonstrate to parents that they are just as qualified and capable as nursery practitioners, which should help to improve parents' perception of childminding. It should also help to ensure that childminders are familiar with the same resources and frameworks as ELC practitioners in nursery settings so that there is some continuity of care where families opt for a blended model of ELC

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

- **Does criteria 3 capture this ambition? If not, how could it be strengthened in a way that is sustainable for providers?**

Criteria 3 is not worded strongly enough to make outdoor play a 'defining' feature of outdoor play. This could be reworded to more closely resemble the National Care Standards which state that children should "have regular access to fresh air and energetic physical play" to encourage providers to make efforts to increase the time spent outdoors or to look at how to adapt premises if possible to allow children to move in and out freely.

- **What challenges, if any, exist for funded ELC providers to ensure children have access to outdoor play? How can these challenges be overcome?**

Funded providers in the third sector often struggle to facilitate regular outdoor play as many operate from shared premises that are not purpose-built nurseries. They may lack suitable outdoor space on the premises, which means that they have to seek outdoor space in the community (which can be difficult in built-up urban areas).

There may be outdoor space on the premises which is not directly accessible from the nursery space, meaning that staff must supervise children going outdoors, and children are not able to move freely from indoors to outdoors. There may also be a lack of natural outdoor spaces nearby, with the result that children's time outdoors is spent within the playground.

These challenges can be overcome by supporting funded providers to find new premises which have better access to outdoor space as well as working with providers to make the best possible use of the outdoor space they have.

It would also be beneficial to ensure there are safe, green outdoor spaces in communities that nurseries can access and to extend the current outdoor play pilot in Glasgow, along with resources and training, to more providers to enable them to work together to run forest kindergartens.

Question 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?**
- **Support increased choice for parents and carers?**

The "funding follows the child" approach will improve choice available to parents and carers as long as this is accompanied by increased ELC provision. Parents need to have a genuine choice of settings that are local and accessible, rather than having to settle for any provision available because local nurseries are oversubscribed.

Parents and carers should be able to use their funded entitlement with other childcare settings, such as third sector family support providers and childminders, as this will improve flexibility as well as the experience of some children for whom full-time nursery may not be beneficial. In order for "funding follows the child" to work for parents there must also be a way for them to easily check how many funded hours they have used and how many they have left.

Due to the requirement of 'good' grades or better for the Care Inspectorate, the Standard is likely to ensure high-quality of provision in all settings. However, it is important to recognise that providers may occasionally see their inspection grades slip due to issues with staffing or premises that are

beyond their control and this does not necessarily mean the children in such a setting are receiving poor quality care. Local authorities should monitor the inspection grades for funded providers and use them to support providers to improve and reach the required grades, rather than punish them.

Question 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?

The Standard should include more detail on making provision for children with additional support needs. It is understood that Children in Scotland have been commissioned to administer the Inclusion Fund and information about applying for grants from this must be made available to all funded providers.

The local authority also has a responsibility to provide for additional support needs but some funded third sector nurseries have reported that this is difficult to access. Some have used their own fundraising to provide equipment and resources for ASNs. Local authorities should make sure there is a clear route for providers to access support and ensure appropriate training is available for staff to work with children who have additional support needs.

Question 5c: 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?

The criteria outlined in the standard seem fair and proportionate, though it is hoped that local authorities will take time between now and 2020 to examine the needs of its current funded providers and give support where necessary to ensure that they are at the required level **before** the standard is introduced.

Question 6: What areas would you look to be addressed in the technical guidance note for supporting implementation of the ELC Living Wage commitment?

Many third sector providers struggle to retain and recruit staff as they cannot compete with the salaries and terms and conditions available to practitioners in local authority settings. Local authorities must work with funded providers to agree a sustainable rate which will close the wage gap as much as possible between local authority and third sector practitioners. Not only will this help to stem the flow of staff out of the third sector, it will also drive up quality by ensuring that all staff are paid fairly for their work.

The Scottish Government has already committed to ensuring that all staff delivering the funded entitlement are paid the living wage. However, in many nurseries where staff also care for babies or provide wrap-around care, this could result in two tiers of staff where some are entitled to the real living wage and some are not. This is not a sustainable situation for organisations and will not result in a “fair and equal” pay policy mentioned in the consultation paper.

Local authorities should therefore work with providers to ensure that their business model will allow them to pay the real living wage to all staff and to ensure that the rate paid to providers is also fair and sustainable.

Question 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?

Yes, new settings should be able to deliver the funded hours on a probationary basis as long as they meet the National Standard. It is understandable that local authorities may be wary of funding

providers who have not yet had an inspection due to potential risks to quality. However, this would increase childcare provision at a time when greater capacity is needed and will also ensure that a new provider will have financial stability, allowing it to focus on ensuring the provision is high quality. The local authority may want to work particularly intensively with such settings in their initial months to ensure they are satisfied with provision, and there should not be too significant a delay before the first inspection is carried out so that the probationary period is not overly long.

Question 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?

Funded third sector providers will require support to ensure that their business plans are robust and that their finances are in an acceptable condition. Some organisations may need focused support on particular areas of the business or preparing for the Care Inspectorate and detailed work needs to be done to assess the extent and type of support required.

Our work in Glasgow indicates that many of the small third sector nurseries need good business support from organisations that understand the third sector ethos and culture, rather than 'generic' business gateway type support. There is clearly considerable potential for more childcare places, increasing hours and using outdoor play to meet expansion needs. However, nursery managers need help to develop business plans to support these.

If capacity is to increase, providers will also require support to look at potential ways of expanding their own provision by adapting premises or acquiring new premises. Local authorities should make grants of capital funding to third sector organisations to build new nurseries or to allow existing premises to be improved or extended in order to ensure a high-quality of environment in every setting.

Glasgow City Council currently provides CPD grants which cover two-thirds of the costs of training, but it is often difficult for practitioners in third sector providers to be released from work during the day due to staffing ratios. Twilight sessions are not popular with staff who have worked a full day. One solution would be for CPD grants to include the cost of sessional staff cover, where necessary.