



Deputy C Curtis

Head of Scrutiny Panel for Children Education and Home Affairs

Submitted Via [Email:Scrutiny@gov.je](mailto:Scrutiny@gov.je) On 06/10/2024

Dear Deputy Curtis

We are writing to you on behalf of our 40 members of the Jersey Association of Childcarer's, all of whom are self-employed, Lone workers but regulated by CEYS.

A brief but clear explanation of a childminder: A lone worker who cares for other people's children from the childminders own home. We are regulated by CEYS under the DAY CARE OF CHILDREN (JERSEY) LAW 2002.

We write further to your letter of 9 September 2024 in response to "Extend Nursery and Childcare Provision". In responding we have used the questions set out in your letter.

The impact that the Government's plans could have on the Early Years sector;

One word: Damaging.

We are very aware of the need for high quality and affordable childcare across the island. We do not feel this proposal will ethically be able to encompass that, while following the island's own laws. The Government of Jersey recently created the Children and Young People (Jersey) Law 2022. This has an overriding objective; the Law is to promote and support the wellbeing and safeguard the welfare of children and young people.

The principles that underpin effective joint working to promote the wellbeing and safeguard the welfare of children and young people are:

- Child-centered, collaboration, communication, coordination, consistency. None of which can truly take place for 2-year-olds within an institutional building.

We do not feel that putting our island's future in school building at 2 years old is in the best interest of the early years sector. It is however in the best interests of adults. The only people who gain from this proposal are adults! Our island's Early years cohorts will not gain from this, and surely this is for whom this proposal is taking place?

Our main concern are the children as they are for whom most people work in the early years sector for!

- Child led - How can a 2-3 room/building with an adult to child 1-6 ratio encourage a child centered approach? You simply can't build a relationship, which a child should be afforded when away from their families in childcare. Not to mention the quality of care a child would receive in such a ratio!
- Collaboration- All the island's resources are stretched to the limits for children and young people. Just because they will be effectively in a government building this doesn't mean any support would be there any sooner than in a PVI setting. Many childminders work closely with any support agencies to ensure the children's physical, Developmental, Behavioral and emotional needs are met should there be an outside agency required to assist.
- Communication - How will the child's voice be heard? And who is listening? The key worker adult will have 6 children or more to hear. Will the child have the trust and confidence to be heard? Communication is key when working in the early years sector, not all children are able to communicate clearly and it's our job to interpret what they are wanting to vocalize. Speaking and sharing feedback between parents/carers is key. We work alongside our families ensuring they know about their child's day, wants, needs, achievements and fun times. Where will the practitioner's find time to do this? And provide those valued interactions with the parents/carers, while ensuring they feel valued and have a truly personal account of their child's day.
- Coordination - In effect this is a hurdle which we feel could be damaging to the 2-3 years children. How will the day to day ensure good practice and high-quality Childcare take place? Will these children be afforded daily outings? With a 1-6 ratio this isn't in line with the required 1-4 nursery outing ratio. So, will children miss out? How will outings be coordinated? 1 adult chasing 4/6 children, who

will not all want to head in one direction. So, the children are then placed in a buggy, or walking in a chain gang and not afforded freedom to run, explore and benefit from said outing. Nap times, how will this be facilitated to ensure a restful sleep has taken place? Sleep room? Own sleep mats? Intimate care, how will this be coordinated to ensure privacy and allowing the child autonomy but ensuring all the children aren't left to soil themselves?

- Consistency – Staff? As the proposal is offering wrap around hours will there be a turnover of staff mid-way through the child's day? So, they need to build two or more meaningful relationships with adults to ensure stability through their day? This isn't good continuity of care. Making the 2-3 proposal to parents with NEF hours means the child will have 4 big transitions of care before they are in Reception of school!

0–1-year parents caring/Maternity leave

1–2year Childminder/Private nursery setting

2–3-year NEF Placement in a school

3-4 year NEF School Nursery

4–5-year Reception Class

This is not offering stable continuity of care to the child! A child doesn't need to build resilience and be that accepting of change so young.

All the above is a mere example of the most basic aspects to childcare and already it shows that the proposal isn't going to ensure a good effect on the current early years sector and that's just with the child are the forefront. We can go on and on how it isn't affording good early years childcare.

How will it affect Childminders and their business?

- We have gone from a 230 strong work force 20 years ago to a small community of 42 registered childminders. The Government's plans would effectively put us out of business and the childminder profession could cease to exist. Or struggle to exist. If this becomes a universal offer the childminders will face losing 3 quarters of their business. While contending with Private nurseries.
- We are currently only able to care for one child under the age of 12 months old, two children over the age of 12 months but under school entry age (3). Placing children aged 2-3 in schools will mean we only care for children from 0-2. Most baby's join us when their parents return to work after maternity leave around 9 months old. For the children then to leave to 2-3 rooms we effectively would only have them for 15 months as opposed to 27/30 months (Approximately) We won't be able to fill our

spaces unless there is a ratio change which includes us. CEYS have apparently given this proposal a 1-6 ratio for the 2-3 year (Private nurseries currently have 1-4 ratio for 2-3 years) (Childminders limited to 1-2 ratio for 2-3-year children and 0-12 months 1-1 or 1-3 ratios of all 2-3 year children)

We all have worked hard to build up a stable business to a professional standard with a fantastic reputation across the Channel Islands and built a community, which this proposal will likely wipe out 3 quarters of our community and in turn make the profession of childminder obsolete as the birth rate has dropped, mixed with overcapacity in schools with the possible universal offer of NEF at 2-3 to schools means there effective would be minimal business for us. At current We believe the PVI currently care for almost all the islands 0-3 years children, With the 2-3's taken into school we are effectively left with 0-2 years, 0-1 year is most likely to be covered by parents/carers. Childminders/Private Nurseries are then left with 1-2 years (12 months of care to provide) fighting to fill the unused spaces.

If relevant, how training and development for staff in the Early Years sector could be improved; including retention of staff

- Paid for on the job training with day release work in our current setting/private nurseries would help retain/retrain and encourage staff to stay on or join the sector. Which in effect could mean an increase to ratios to plug the childcare shortage gap. If the NEF hours were offered universally across the sector, businesses could afford to offer better perks/working conditions to encourage staff to stay on.
- We believe the current Childminder entry qualifications/requirements have been lowered and in effect opening the door for more to walk in and take up this profession, could do so without a current childcare qualification... The government could be funding these previously required qualifications to encourage personal growth and allow those who want to progress in this profession the ability to do so. Which in turn creates more childcare spaces, and more adults back to work and in a sector that needs staff!
- They can go into secondary schools and offer up these courses to gain the qualifications to the school leavers as an attractive prospect.
- Offer weekend courses/training opportunities- Most childminders work 5 days a week and evenings/weekends are the only times we have available.

- Retainment of staff/childminders would be better if it was fair across the sector with regulations. A lot are feeling discarded and not given equal or similar treatment or feel many discrepancies and we are often left wondering why we do this job, when at times those in the regulatory roles/ government can't even put Jersey Children First. Often being told the islands parents have no choice in where their children go for childcare and that they should quit their jobs or shouldn't have had children if their childcare wasn't in place.

What consultation has already taken place with the sector and / or what consultation would you expect to take place before changes are implemented?

- As a part of the PVI Sector we/The childminders were not included in this, we were not invited or had even heard about it till it was in the press. We managed to hear from JEYA and they were the Association who encouraged us to make contact. We have had to request contact with Rob Ward as he hasn't contacted us, although all the PVI has apparently been contacted, we had not. We are meeting with Rob ward on Monday 7/10/2024 to discuss if how and where we can fit into this proposal.
- We met with Lousie Doublet and spoke about retention for childminders and possible changes to our regulations to improve and allow growth to our business but only the recruitment childminder incentive came from that, no room for growth was deemed acceptable.
- We took part in the Early years round tables that was to explore potential future policies that will achieve an early year's system with capacity to deliver high quality, affordable early education and care that supports the best possible outcomes for children, which we do not feel much of it has been taken on board or used when drawing up this proposal... One box doesn't fit all! That's why there are choices in childcare, essentially pushing the PVI sector to close for 2-3years means all those 2-3 year olds must fit into that one box! As the current climate and cost of living means families would have to utilize the NEF funding for their children, and if limited to states school placements and not free choice/ universal then all these 2-3 year olds fit in that one box which will be damaging.

Further questions:

Child related:

Will the 2-3 children be sharing rooms/play space with the 3-4years?

How are the days going to look for these 2–3 year olds? What's the breakdown of their day?

What about SEND children? Where will they fit into these rooms? There is already a clear struggle for these children in schools currently with and without Diagnoses and gaining no meaningful support... What's being put in place to ensure every 2-3 has the support?

What will their outside space look like? A 2–3 year old not having full use of outside space and freedom is shameful.

What happened to Jersey supporting the child's first 1000 days of life, have we forgotten putting Jersey Children First.

Countries like the Netherlands/ Switzerland/Sweden/Norway have an enormous amount of evidence surrounding later school age and the importance of play that supports children's wellbeing and health, they have the 'happiest children in the world' as a direct response to not institutionalising children, why are we putting our 2 year olds into schools and not learning from these countries? (They have 12 years of mandatory schooling in Jersey, why add more of the same.)

As all PVI settings must be eat safe rated, will these rooms have such ratings? Will they be eligible for the schools' hot meals? If so, where will these be had? And what format are these 2-year-olds expected to sit and eat?

Business related:

Will the PVI Sector (Childminders included) be afforded the full use of the universal NEF offer? Can the parents use their funds with us?

Will you be offering full time wrap around and holiday care to the families?

Have the legal space requirements per child been met in each proposed location? (2.8m² per child)

What will you put in place to support PVI settings with the higher business costs due to the lowered demand and costs to keep our settings open? If we are not included in the Universal usage of the NEF funding.

Will the PVI settings be afforded the same changes to the ratios and requirements that the states settings have granted?

We would like to thank you for taking the time to include us in this review and look forward to hearing the progress.

For and on behalf of:

The Jersey Association of Childcarer's