

SCMA Response to Consultation on Shared Inspection Framework

To provide credit, the document reduces duplication between existing frameworks and includes indicators which we would broadly support but is mostly generic (“one size fits all”) in nature, fails to deliver on proportionality and provider-specificity, and demonstrates a fundamental lack of understanding about childminding.

There are several fundamental problems with the document which could have been addressed at an earlier stage, had this been shared with representative organisations for input prior to consultation.

In the main, the document presents primarily as a pre-school framework for nursery staff and provides little beyond this. It attempts to assimilate childminding into a nursery-type environment to be inspected against rather than considering how to inspect childminding. In doing so, it demonstrates little understanding about childminding and that approx. 82% (2,382) of childminders are sole practitioners/service providers. As such, it is completely inappropriate to propose grading criteria such as accessing shared learning, networking and working together with others, which sole practitioners are unable to undertake during the day. This would actively disadvantage childminders through no fault of their own and a lack of basic understanding about their practice model. This would be compounded in rural areas.

Similarly, there is no sense of proportionality, and childminding settings cannot and should not be compared with larger dedicated nursery settings (i.e. design, layout, resources, financial management etc.). Proportionality to childminding should be more clearly defined to reduce subjectivity/opinion, variation and inconsistency in inspection and instead of setting inappropriate, unrealistic and unachievable standards for sole practitioners/small businesses to fail against.

There is scant reference to School Age Childcare (SAC) within the document. Where this does feature it does not reflect that childminders are heavily involved in delivering SAC. The reference to SAC “learning” also requires clarification, as this implies education will continue and services will be inspected on this for SAC. While we support play-based learning, we do not believe curriculum-based learning would be appropriate for SAC.

Provider-specificity requires to be embedded within and throughout the document rather than being considered as an add-on. The entire document should be less nursery-focused and more provider-specific. It should be made clearer where sections are only relevant to a certain sector i.e. those delivering funded ELC. The document requires fundamental re-presentation. A childminding-specific version could be much more effective. Alternatively, instead of presenting this as a traditional publication to be read from beginning to end it could be published in a more interactive online format in which practitioners could drill down through different content streams relevant to them by provider type and then by if also delivering or not delivering funded ELC. This way practitioners would be presented with only their relevant set of criteria, avoiding confusion, and with language tailored to their practice.

While recognising that funded providers will be assessed against additional criteria, there is a risk that this will create a two-tier grading system with funded providers receiving higher grades due to this. This would not be appropriate – childminders should be graded fairly upon the quality of their service provision and not graded lower if not delivering funded ELC.

Changes to language used are required throughout, as this is based on larger staffed, nursery settings (“staff” and “team/team leader”, assuming there is more than one person within the service). “Staff” should also be changed to “practitioners” to be more of inclusive of childminders, early years practitioners and SAC practitioners and to attach greater value to what they do. “Leadership” should be expanded to reflect

individual and collective leadership, to make this more relevant to childminding, as childminders do lead their own practice and setting.

It will be very important to understand the local authority reaction to, and level of confidence in, this document (as the primary guarantors of quality under ELC expansion), as it would be self-defeating if local authorities do not believe it is adequate and feel the need to develop their own frameworks in response to this, as has already been experienced during ELC expansion. As such, it is imperative that this document works for all parties (Scottish Government, Care Inspectorate, Education Scotland, local authorities and providers).

We believe that this document is not fit for purpose in its current form, significant re-working is required and that implementation should be delayed.

SCMA will be happy to provide further input to assist.