

Professional registration of the childcare and playwork workforce

Which of the following statements describes you?

A) I am a member of a stakeholder organisation or work for a local authority.

Which of the following best describes your role?

G) Other

1. A workforce register would offer benefits for:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not sure
Those working in the childcare and playwork sector			X			
Employers in the childcare and playwork sector			X			
Families accessing the childcare and playwork sector			X			

How do you think a register benefits these groups? Please explain your rationale.

Based on information from the sector, it is unclear at this stage and with the available data whether the register would provide more benefits for the sector than challenges and an additional process for practitioners. From stakeholder conversations we are receiving mixed feedback ranging from strongly agree to strongly disagree. There is a sizeable number who are uncertain too. As the Welsh Government has suggested some benefits, whether these are perceived as benefits to the workforce is also influenced by how well used the register would be by employers, the costs that the sector (and individuals) will face to implement the register, and the affective responses to the user interface (making an assumption that the register will be digitally hosted).

Indications from employers are also split between those who are in favour and those who are not or who have felt unclear at this stage in time. Again, potentially further detail and examples would help the employers to determine how effective this tool would be for their use.

Perceptions from our members about the value for parents is slightly higher than the previous two categories. Potentially this is because the perception is that other sectors have a register and might be influenced by feelings of missing out, or as a result of the childcare and playwork sector feeling undervalued compared to professionals working in education and health. In theory, there are already sufficient legislative measures, safeguards and checks in place to fulfil the role a code of conduct indicates it would contribute to. The NMS and curriculum outline the practice regulatory requirements. All staff have to demonstrate their 'fitness to practise' through their qualifications, mandatory training, current DBS checks, ongoing development, and right to work in the UK and Wales. A register might allow staff to locate this key information in one place, but in principle it does not add a new lever to the reasons why someone might not be able to work with children and if vetting and barring is followed accurately, anyone removed from a setting under conduct for working with children should be identifiable. The only 'fitness to practise' benefit might be in values and behaviours that are below the threshold for legislative measures, which could be addressed through a code. These could currently be addressed by supervision and management processes and, if a worker moves on from a setting, through reference checks.

2. Workforce registration should be mandatory for those eligible?

Not sure

Please explain your rationale.

If there is a professional register, mandatory registration would seem to be the most logical system to ensure that the register is comprehensive and widely used. Voluntary registration, particularly if there is a cost associated with it as the consultation indicates there could be would seem to be difficult to 'sell' to practitioners. The childcare and playwork sector is (generally) not well paid, and certainly less well paid than many in education roles as way of a comparison. If the register is mandatory, the evidence needs to be compelling that this process will add weight to the desire from the Welsh Government to have a highly skilled, and respected workforce in Wales and both the register and associated childcare policies must facilitate a method of increasing the wages across the sector.

For individual practitioners, consideration must be placed on those who work in multiple roles. In our 2022 study of the workforce pay, recruitment and retention 59% of responses (N=195/331) stated they had a second job. If these individuals are already on a workforce register this must be considered, and how to capture individuals with multiple roles in childcare and playwork. Alongside this, if there are multiple codes of practice, how these align and what happens if conduct falls below one code of practice; would this default to extend across other codes, and how will this data be communicated and shared.

Linked to the perception of parental views shared above, there is a train of thought that suggests a professional register would increase the status of the workforce. In some instances the register might contribute to this, however we maintain that the pay and conditions for the sector has a greater resonance with how the status of the sector is perceived. This is particularly pertinent to the concept of encouraging students and young professionals into childcare and, in our opinion, more compelling than whether you are a registered practitioner or not as the case is at present.

3. The following SHOULD be included in a childcare and playwork workforce register

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not sure
All Staff in registered childcare settings who are paid to work directly with children						X
All Staff in registered playwork settings who are paid to work directly with children						X
All Staff in registered childminder settings who are paid to work directly with children						X

How do you think a register benefits these groups? Please explain your rationale.

If there is a register, equality across playwork and childcare might be an important consideration, particularly in light of the number of people who have roles in both sectors as part of their working lives. As the value of the register is unclear, it is difficult to express an opinion more strongly in either direction.

Assuming a register was implemented, we would agree that all staff working directly with children in childcare should be registered. Childminders might perceive they are already 'registered' individually through their registration with CIW; the difference between CIW's provider register, and their practitioner registration will need to be clearly communicated.

We are not expressing a definitive position with playwork as both Clybiau Plant Kids' Clubs Cymru and Play Wales each have a greater engagement with the playwork sector to share balanced views.

4. The following SHOULD NOT be included in a childcare and playwork workforce register

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not sure
Staff working in unregistered childcare and playwork settings						X
Volunteers		X				
Registered Persons/ Responsible Individuals who do not work directly with children		X				
Students working in a voluntary capacity at a registered childcare and playwork setting		X				
Staff, such as cleaners, who work in registered childcare and playwork settings but not in direct contact with children		X				
Nannies						X

Please explain your rationale.

As noted above, playwork is not our core business so we will leave this to other partners to respond to. With respect of unregistered settings the Welsh Government must be guarded about unintended consequences of requiring a registration from individuals working within registered settings. We would not want to create a situation where settings expose loopholes in registration or their service to avoid needing to register staff with the professional register.

We agree that RI's and RP's not working directly with children do not need to register. Many of these will be voluntary positions and adding a burden (administrative, financial, or both) risks losing the goodwill of people currently within these roles. The benefits to the individual would be limited, and the risks to children (and therefore the need for the code of practice element of a register) are limited by their lack of child-facing work. The same would apply to auxiliary staff and each provider will have checks in place to safeguard children.

As an organisation, we have limited contact with Nannies and therefore have decided not to express an opinion on this sector.

5. Should a childcare and playwork register be established in Wales?

Not sure

Please explain your rationale.

Opinion seems to be divided in response to the benefits and value of a register at this stage. Whilst we appreciate this was part of the 10-year workforce plan, further detailed work is needed to respond to the unknowns about the costs / benefits of a professional register. The one obvious structural benefit is a better understanding of the workforce within Wales. The benefits to individuals, employers and parents are less clearly evident at this stage.

It is important to note that the costs might be an unwelcome and untimely pressure to the sector. Since 2020 there has been substantial evidence about the vulnerability of the sector in childcare and playwork. This has resulted in staffing concerns, sustainability concerns, and adding another process and cost to a workforce under pressure might be considered unhelpful.

Structurally, the position of and interface of the register must be clear. Where staff work in education, they will already be registered, and if they also work in childcare or playwork there must be clarity on which register and code of practice is relevant. Indeed, it cannot be that the process of registration disadvantages the sizeable number of practitioners working in more than one role, many of whom have dual roles in childcare and playwork, or education and the childcare or playwork sectors.

The administrative burden of implementing a register, maintaining and updating personal records must be considered too. Unlike in education, where either holiday periods or planning and preparation time is in-built into work conditions, for many in childcare and playwork the task of updating their register with CPD, for example, will be a task completed in their own personal time outside work hours. This is particularly true of childminders who are also completing other administrative and training tasks in the evening and weekends when they are not in contact with the children in their care. Similar circumstances apply to smaller childcare settings too, where the staff time out of ratio is limited and therefore adding tasks might lead to individuals undertaking mandatory processes in their unpaid and uncontracted time.

As with all the points raised, until there is more clarity, it is difficult to argue for or against a register.

Further factors such as, reviewing the Exceptions Order might increase the clarity of who should be registered and how to mitigate against unintended de-registration and use of loop holes; ensuring that the workforce the Welsh Government would like to see registered are registered and not overlooked or hidden by a loophole.

Additional questions have been noted previously within the response, like the interaction between different registers and codes of practice.

6. If a childcare and playwork workforce register was to be developed, when do you think this should happen?

In the medium term (register developed in 4-6 years)

Please explain your rationale.

We would advocate for some of the structural changes (like the Exceptions Orders) and some of the policies in progress, like the expansion of funded childcare need to be completed more fully before the professional register work is taken forwards. Some of the challenges need the sector to invest time, energy and commitment into and others (like a review of the Exceptions Orders) might need legislative actions. Adding a register at this stage is creating a new change for the sector at a time where pressures within the sector across Wales (and the UK actually) are challenging.

7. Do you have any other comments to make about developing a register for the childcare and playwork workforce?

As an organisation, we would like to see the perception of the workforce valued more highly. Even though a position statement like a professional registration might be thought to be helpful, we do believe that there are other levers that can be used to share the professionalism, value and impact of the childcare and playwork sector in Wales for children and the communities within which they operate.

8. What, in your opinion, would be the likely effects of the proposal on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects?

Do you think that there are opportunities to mitigate any adverse effects?

It must be noted that within the sector, we are struggling to recruit and retain staff. Where this is true, adding Welsh language skills as a requirement elevates this challenge by reducing the available suitably qualified workforce. As the concept of a professional register is explored, care must be given to ensure that there is no negative impact on current and future recruitment of practitioners able to work through the medium of the Welsh language.

Submit your response

Do you live in Wales?

Yes

Do you have a business interest in Wales?

Yes

Please provide the first part of your home postcode, e.g. CF10

CF10

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Dave Goodger

Organisation (if applicable) Early Years Wales

If you want to receive a receipt of your response, please provide an email address.

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