



Future of Inspection

for Early Learning & Childcare and School-Age Childcare Services in Scotland

SCMA Response and Evidence



scma Scottish
Childminding
Association
committed to quality childcare

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The Future of Inspection in Early Learning & Childcare and School-Age Childcare Services in Scotland

SCMA Response to Scottish Government consultation (informed by #TellSCMA Childminding & You Survey 2022)

SCMA welcomes this important consultation. While we appreciated the offer from the Early Learning & Childcare (ELC) Directorate to host a facilitated engagement event for our members on the consultation, we chose not to do this as we were involved in the co-delivery of a number of webinars for members with the Care Inspectorate and Education Scotland at that time, and believed running a further event could reduce attendance across all of these events due to childminders' increasing commitments. Instead, we felt that undertaking an in-depth survey with members to inform the consultation would be more meaningful and also enable us to go beyond the scope of the questions asked within the consultation document (general experiences of inspection and quality assurance, and preferences for the future), so that we could obtain more in-depth data on a wider range of aspects of inspection and quality assurance. We know from our experience of working with and supporting members that these issues are very important to them and should therefore be reflected in both our response and within the Scottish Government's consideration of the future shape of inspection and quality assurance for childminders.

What We Already Know

- The childminding workforce has declined by 30% with the loss of 1671 childminding business and over 10,000 childminding places for families in the last five years during the expansion of Early Learning & Childcare (ELC) and the delivery of '1140 by 2020'. SCMA is supportive of ELC policy, but has major concerns over the manner in which it has been implemented nationally and locally, documented through our series of annual independent audits, and which has had a devastating effect on the childminding workforce.
- A large-scale SCMA survey in 2020 found that the level of bureaucracy and paperwork associated with childminding practice which has increased significantly under ELC expansion was the main reason childminders had left our workforce (70%) or were planning to leave our workforce within the next five years (57%), closely followed by not being able to compete with local authority ELC nursery expansion. This survey also found that 25% of the remaining workforce didn't think they would still be childminding in five years' time and another 26% were undecided.
- The childminding workforce is ageing (25% are aged 55+).
- Run these figures together, as we did, and you have the makings of a workforce crisis.
- This is why SCMA launched our new strategy in May 2021, midway through the pandemic and at a time when few were looking forward, to promote recovery, strengthen childminding, support families and increase choice and why we have been leading nationally on childminder recruitment and tackling the issues which have caused and continue to cause the decline in our workforce.
- This is very important to children and families as all forms of childcare are not the same and childminding is an informed choice of childcare which they cannot access in other settings. Childminding is a unique and highly nurturing form of childcare delivered in a home, with low adult-child ratios enabling more personalised support, where children of different ages learn and play together in small groups benefitting development; it caters for children from 0-12 (or 16 in the case of children with additional support needs); provides strong continuity of care through various transitions and additional family support; and childminders consistently achieve higher quality ratings, across all criteria, through independent inspection by the Care Inspectorate, than Daycare of Children's Services (local authority and private nurseries together)
- Our members and the wider childminding workforce are swamped and have little time to read lengthy documents. For this reason, we are keeping this response as short and high-level as we can while still providing key detail. There is now so much evidence supporting the need for change that rather than include it here we have produced a separate accompanying Evidence Paper, which also provides the wider context and background, and we are also submitting our latest detailed survey results to further support our response.

What This New Survey Has Told Us

(SCMA large-scale survey conducted 14 September – 9 October 2022 which received responses from 1263 childminders (45% response level) in 31 local authority areas, including funded providers and childminders not involved in funded ELC. In addition 994 free-text comments were captured on the Future of Inspection.)

CURRENT INSPECTION

The current system of inspection by the Care Inspectorate is not working for childminding.

- only 34% of all childminders who responded believe it has a strong/very strong understanding of childminding;
- only 37% believe it has a strong/very strong focus on childminding; and
- only 38% believe it has a strong/very strong relevancy to childminding.

In parallel, many childminders have found inspections inconsistent and believe they are too focused on funded ELC and documenting practice against it and require to be re-balanced:-

- only 42% believed their own inspections had been consistent or very consistent and 62% believe inspections between childminders are inconsistent or very inconsistent, with 95% of those who believe this reporting this is influenced by inconsistency between different inspectors. As childminders are mainly sole workers, many childminders around Scotland are actively involved in networking and local childminding groups in which professional experiences are shared openly. A number of respondents also found the inspection process to be subjective and opinion-based with different inspectors attaching greater or less value to different aspects of practice.
- the primary driver of the current quality assurance system has been to support the expansion of the statutory entitlement of funded ELC and the delivery of '1140 by 2020', with different statutory organisations requested to develop systems to support this. However, unlike other providers, this forms only part of many childminders' business models. We have previously estimated that only around 27% of children in childminding settings are within the scope of the statutory entitlement (three- and four-year-olds and eligible two-year-olds). The remainder are outwith the scope of funded ELC – babies, one-year-olds, non-eligible two-year-olds and 5-12/16 year-olds (with approximately 50% of children in childminding settings being of school-age). As such, it is not appropriate to inspect and quality-assure childminders' provision of care to this wider age group on the basis of standards, frameworks, and outcomes developed for mainly three-four year olds and on a quality assurance system which is based on a nursery good practice model and doesn't reflect different forms of childcare. There is significant concern that if the Scottish Government and statutory organisations continue with implementing such a uniform model for all forms of childcare this will actively disadvantage childminders who are being inspected against standards which don't reflect their practice model. It is clear that an increasing number of childminders believe they have started to be marked down in inspection for poor recording and paperwork, rather than their practice and without any understanding of the multiple competing demands on their time (see below regarding self-evaluation and paperwork).

Delays in inspection and increasing anxiety:

- 46% of all childminders who responded reported it had been four or more years since their last Care Inspectorate inspection (with 28% reporting it had been more than four years). We appreciate this has largely been outwith the Care Inspectorate's control, as the pandemic was hugely disruptive and they were unable to conduct physical inspections during that time. We further understand that the Care Inspectorate has a large backlog and has been prioritising physical inspections for newly registered childminders or those whose self-evaluation raises any concerns. However, what this survey has shown is that many childminders have not had a physical inspection for some time (with a number noting six or seven years in their free-text comments). When you consider this alongside the significant changes in quality assurance during that time, and the much greater emphasis on paperwork and standards of documentation, many childminders are feeling extremely anxious about their next inspection which could happen at any time, without warning, and are fearful this could result in a downgrading of their service.

More positively, while inspections are supposed to be unannounced, many are not:

- 60% of childminders who responded reported that their inspections had been arranged in advance or had been a mix of announced and unannounced inspections, as inspectors had pragmatically realised that childminders are mostly sole workers, undertake a lot of practice outside and may be out if turning up announced.

- Linked to the above, what came through very strongly in this survey is that childminders' experience of inspection is unlike any other. If the inspection is unannounced, it would be hard to think of any other professional (in another sector or within childcare), who as a sole worker would be expected to accommodate an unplanned inspection, admit a stranger into their setting and home, to have their service officially reviewed (with potential impact on grading, business reputation, ability to deliver funded ELC and income) for up to (in some reported cases) five hours, while they are still professionally responsible for up to six children in their sole care, could be settling in a one year old or caring for an older child with autism, who may find the inspection disturbing, and having to focus and answer questions about their professional practice and provide a range of documentation. It is clear that a number of childminders believe the process shows little respect for childminders and there could be additional benefits in announcing inspections a short period before to allow some preparation while maintaining objective scrutiny.

Fairness of inspections

- It is encouraging that 55% of respondents thought their experience of inspection had been fair, with a further 25% believing it have been very fair. 11% of respondents (n=123) believed their inspections had been unfair or very unfair. Of these, only 39% had asked the Care Inspectorate to review their report and grading, and 61% decided not to ask for a review. When asked what had influenced their decision not to ask for a review, respondents answered as follows (ticking all answers which applied) - 53% believed this could have adversely affected future inspections, reports and ratings; 51% did not believe their concerns would be taken seriously; and 47% believed this would have adversely affected their relationship with their inspector. While this is a small sample of 75 childminders (within this much larger survey) who believed their inspection unfair and didn't ask for a review, it does indicate that despite the Care Inspectorate's assertion that any provider can ask for a review of their inspection reports, childminders and other providers may not feel able to request a review and to challenge an inspection report which they believe unfair for fear of adverse consequences due to the balance of power within their relationship with the inspector and the position of authority held by the Care Inspectorate. As such, this finding would benefit from being investigated further on a larger sample in future research - particularly given the data within this survey regarding many childminders' experiences of inconsistency in their own inspections and between childminders' inspections.

CURRENT SELF-EVALUATION & PAPERWORK

Wider impact of earlier failure to deliver a single/shared inspection:

As a result of this not being delivered, childminders now find themselves being inspected by the Care Inspectorate and undertaking up to three forms of self-evaluation with three different statutory organisations (Care Inspectorate, Education Scotland and local authorities' own frameworks) on their singular practice and there has been a significant increase in the number of additional standards and frameworks layered on, requiring to be incorporated into practice and with their own detailed outcomes reporting. This growth in quality assurance has also been accompanied by a significant increase in paperwork and additional training and other requirements all of which collectively have disproportionately affected childminders, as predominantly sole workers, who practice during the day, have to undertake all of this additional work unpaid, in their own time in the evenings and at weekends. In contrast, practitioners in nurseries who face similar requirements, have teams of managers, other practitioners, finance, administrative and quality staff to assist them and get paid to do this during working hours. New findings include –

- **Self-evaluation:** three different models of self-evaluation have been developed to support the expansion of ELC and the delivery of 1140 by 2020 – the Care Inspectorate's Quality Framework, Education Scotland's How Good Is Our ELC and some local authorities have also developed their own local frameworks (often involving a mix of indicators taken from the Quality Framework, How Good Is Our ELC and Realising the Ambition). The Quality Framework is the main form of self-evaluation used by childminders, as it applies to all childminders (both funded providers and those not involved in delivering funded ELC). Prior to conducting this survey, it was recognised that this is a comprehensive tool, it is an improvement on the Care Inspectorate's previous model of self-evaluation and some childminders have found it useful, although many have also required support to use it. However, looking ahead to what childminders would like to see in the future, we tested these three models of self-evaluation against five fundamental criteria – their ease of use, their relevance to childminding practice, their ease of ability to evidence practice against, their value in supporting reflective practice and in improving practice.

The three forms of self-evaluation achieved higher ratings than the current Care Inspectorate inspections; all provided greater value to partner provider childminders delivering funded ELC than to childminders not involved in funded ELC; with the Quality Framework tracking ahead of How Good Is Our ELC which, in turn, tracked ahead of local authority frameworks; **but all still indicate limited value, understanding, relevance and support for childminding practice if we were to apply the National Standard criteria of ‘Good’ or above for delivering funded ELC to the forms of self-evaluation themselves –**

RATED GOOD or VERY GOOD	Quality Framework		How Good Is Our ELC		Local Authority framework	
	All	Partner Provider	All	Partner Provider	All	Partner Provider
Ease of Use	52%	60%	42%	56%	34%	44%
Relevance to childminding practice	49%	59%	42%	55%	35%	45%
Ease of ability to evidence practice against	46%	56%	41%	53%	33%	45%
Supporting reflective practice	47%	55%	41%	52%	34%	46%
Improving practice	47%	55%	40%	52%	34%	45%

While all childminders are required to self-evaluate against the Quality Framework, the fact that some childminders who are not involved in delivering funded ELC have been accessing How Good is Our ELC and local authority frameworks may be surprising, but not necessarily so given that the primary, if not exclusive, focus of training and communications from statutory organisations is on funded ELC and does not recognise that not all providers are involved in doing so. A number of respondents to our survey also volunteered feeling confused, overwhelmed, not knowing where to start or even if they are completing the right paperwork.

38% of all childminders who responded and 48% of partner provider childminders have found completing these separate forms of self-evaluation duplicative or very duplicative.

It is also of emerging concern that a number of respondents openly admitted they are behind with their self-evaluation, and are aware this could adversely affect their inspection gradings, but have had to delay undertaking self-evaluation due to a combination of having to deal with other paperwork and information requests with tight deadlines and the significant level of time involved in completing three separate self-evaluation exercises. As such, it would be inherently unfair if the wider increase in paperwork (detailed below) is allowed to adversely influence childminders’ inspection gradings and business. Respondents also asked for more support and guidance to enable them to undertake effective self-evaluation.

- **Impact of paperwork:**

- 48% of all childminders (and 66% of partner provider childminders) who responded are now doing an additional 5+ hours of paperwork per week; and 27% of all childminders (and 36% of partner provider childminders) who responded are now doing an additional 7+ hours (a day or more) per week to support this;
- 43% of all childminders (and 53% of partner providers) who responded have already had to or believe they will have to reduce their practice to support this; with 86% of all (and 93% of partner providers) who have had to /will have to do so by 3 or more hours (half a day) per week; and 34% of all (and 42% of partner providers) by 7 or more hours (a day) per week;
- 82% of partner providers who responded reported that delivering funded ELC has resulted in a significant or very significant increase in paperwork. The main examples provided included – local authority

duplication of national quality assurance activity (multiple demands – improvement plans, self-evaluation with information to be recorded and evidenced differently to that captured by the Care Inspectorate and by Education Scotland self-evaluation systems for the same purpose); additional courses and training; recording more detailed observations across an increasing range of frameworks; a significant amount of work required around local authority payment for delivering funded ELC (in arrears, with regular errors, late payment, repeat invoicing etc); Personal Learning Journals for each child (which have become more detailed, linked to different organisations' requirements, can have to be done in own time as with everything on this list and can be very time-consuming to complete); a constant barrage of e-mails, often with short notice requests; and attending regular meetings;

- As a consequence, 53% of partner provider childminders who responded believe it unlikely or very unlikely that they will still be delivering funded ELC in 2-3 years' time if the level of paperwork is not reduced;
- For those not delivering funded ELC, 70% reported that the level of paperwork is a strong or very strong factor in influencing their decision not to deliver funded ELC; and 47% believed they would be more interested in doing so if the level of paperwork reduced, became more proportionate to childminding, lighter-touch and more joined-up.

FUTURE OF INSPECTION

- **Single/shared inspection and single/shared quality framework for ELC and school-age childcare: format, frequency and by whom –**

- A majority of all childminders who responded (56%) would support a single/shared approach in principle (ranging from 40% of those not involved in delivering funded ELC to 70% of partner providers).
- Very few opposed this (9% of those not involved in funded ELC and 5% of partner providers), with the remainder undecided (37% of all, 51% of those not involved in ELC and 25% of partner providers).

This qualified or hesitant support reflects the recognition that many childminders' experiences are that current inspections are already very long, a significant amount of time is already involved in completing separate self-evaluations and that if the creation of a single/shared inspection and framework resulted in a doubling or even any increase in time it could make matters worse and could not be sustained – in contrast, such a system would need to be simplified and streamlined and based on a much-reduced and rationalised number of accompanying standards, frameworks and outcomes reporting.

- 63% of all childminders who support a single/shared model would favour a more frequent national inspection than the current every four years (which was preferred by only 33%).
- 57% of all childminders who support a single/shared approach would support a national inspection being complemented by self-evaluation between inspections.
- 84% of all childminders who support a national single/shared inspection, believe this should be the only inspection and should remove the need for local authorities to undertake their own self-evaluation activity.
- 88% of all childminders who support a national single/shared inspection believe this should be more childminding-specific recognising the unique nature of childminding and that it spans pre-school and school-age (and including similar aspects to other providers where appropriate), with only 10% favouring a generic system focusing on the same aspects for all childcare providers.
- 90% of all childminders who support a national single/shared inspection believe it should be announced (21% with extended notice and 69% with more limited notice).

- **Single national body with responsibility for overseeing ELC:**
 - 54% of all childminders who support a national single/shared inspection and framework believe this could best be supported by creating a single national body responsible for ELC (ranging from 39% not involved in delivering funded ELC to 67% of partner providers).
 - A minority opposed this (12% of all, 17% of those not involved in funded ELC and 8% of partner providers) and 34% of all were undecided, reflecting the sense that it is unclear if this would improve matters and also that creating a single national body for ELC may not include school-aged childcare – an important point to childminding given that approx. 50% of children in childminding settings are of school-age
 - As such, this came across more as support in principle, subject to working out further detail
- **As may be apparent a number of prominent themes ran through the survey statistics and analysis of 994 free-text responses received on inspection and quality assurance, including particularly –**
 - **Inspection and quality assurance are too nursery-focused and there is a pressing need for a childminding-specific approach.** In seeking to deliver ELC expansion, quality assurance has sought to ensure consistency of quality in receipt of the funded entitlement. However, it has done so by implementing a generic model based on what would be considered good practice in nurseries on an all-provider basis, and the false assumption or understanding that all forms of childcare are the same. They're not. No meaningful thought has been given to starting by understanding different forms of childcare provision and then building up and considering how more setting-specific and relevant inspection and quality assurance could be developed to support the delivery of the funded entitlement within such wider childcare settings. This makes it all the more remarkable that childminders consistently achieve higher ratings across all quality criteria, through independent inspection by the Care Inspectorate, than Daycare of Children's services (local authority and private nurseries combined).
 - **Loss of focus on the child in favour of documentation:** and of most concern that we have lost what should be of the greatest importance to all of us – the focus on the child – through the industry of quality assurance which has built up around ELC expansion and many childminders believe this has gone too far and become an obsession with tick box bureaucracy which puts good documentation ahead of good practice and there is a need to ensure that, in addition to learning, "children feel safe, happy and secure".
- **Further testing of SCMA's evidence-based position that quality assurance must become more joined-up, lighter touch (with fewer frameworks and reduced outcomes reporting) and more proportionate to childminding:**
 - 72% of all childminders who responded agreed or strongly agreed that quality assurance must become more joined-up (ranging from 60% of childminders not involved in funded ELC to 82% of partner providers);
 - 82% of all childminders who responded agreed or strongly agreed that quality assurance must become lighter touch, with fewer frameworks and reduced outcomes reporting (ranging from 76% of those not involved in funded ELC to 88% of partner providers); and
 - 86% of all childminders who responded agreed or strongly agreed that quality assurance must become more proportionate to childminding (ranging from 79% not involved in funded ELC to 94% of partner providers).

What Childminders Need in the Future

- **Scottish Government's vision for future inspection:** while being broadly supportive, this also needs to recognise and value the different forms of childcare and support provider-specific needs
- **A single/shared inspection and single/shared quality framework for ELC and school-age childcare:** This is supported, but would need to be –
 - **More childminding-specific, recognising the unique nature of childminding, that it spans pre-school and school-age** (but including similar aspects to other providers where appropriate).
 - **Less focused on funded ELC and more balanced** (recognising that childminding supports children from 0-12/16 and it is not appropriate to evaluate childminders' wider practice for babies, one-year-olds, non-funded children and school-age childcare against narrow standards and outcomes developed for 2-4 year olds receiving funded ELC (and on good practice in nurseries), and an accompanying need to ensure care and learning elements are appropriately balanced for each age-group – particularly for school-age children who undertake learning at school, should not be expected to undertake further learning outwith and for whom it wouldn't be appropriate to evaluate childminders' care for them on standards developed for ELC;
 - **More focused on the child than documentation, with much-reduced paperwork;**
 - **More understanding of childminders' professional responsibilities at the time of inspection: all inspections should be announced in advance with limited notice (recommended min. 24-48hrs), maintaining scrutiny while recognising and respecting most childminders will also be responsible for the sole care of all children in their setting throughout the inspection,** and more appropriately allowing for required paperwork to be requested and collated in advance rather than while caring for children;
 - **More consistent with improved consistency between inspectors and between childminders' inspections around Scotland**
 - **Based on a model of –**
 - **a single/shared national inspection** (preferably to be conducted more regularly than the current every four years).
 - **complemented between national inspections by self-evaluation based on a single/shared national quality framework, removing the need for local authorities to undertake their own self-evaluation activity;** and
 - **a simpler, shorter and higher-level quality-assurance framework based on a rationalisation and reduction of related frameworks (including the Quality Framework, How Good Is Our ELC, Realising the Ambition, Out to Play etc) and much-reduced outcomes requiring to be recorded;** and with more support required for childminders to undertake self-evaluation
- **The need for a single national body with responsibility for ELC:** a majority of childminders who support a national single/shared inspection and framework believe, in principle, this could be best overseen by a single body responsible for ELC, however a number are undecided and it is also unclear how this would relate to school-age childcare which forms an important part of childminding
- **An overwhelming majority of childminders who responded to this survey also supported SCMA's evidence-based position that, while as a professional membership organisation we are committed to and recognise the value of quality assurance, quality assurance must become –**
 - **More joined-up**
 - **Lighter touch (with fewer frameworks and reduced outcomes reporting)**
 - **More proportionate to childminding**

Conclusion and Recommendations

We welcome the Scottish Government consultation on the 'Future of Inspection in Early Learning & Childcare and School-Age Childcare Settings in Scotland' and the proposed single/shared inspection and single/shared quality framework model. However, many will question why this is being consulted on again, and if anything will change, as the Scottish Government had previously accepted the recommendation of an Independent Review in 2015 that a single or shared inspection was required and charged the Care Inspectorate and Education Scotland with developing this. This was not delivered. This has resulted in childminders being inspected by the Care Inspectorate and having to undergo up to three separate forms of self-evaluation through the Care Inspectorate's 'Quality Framework', Education Scotland's 'How Good Is Our ELC' and local frameworks developed by local authorities who don't recognise the Care Inspectorate's role, and/or (as they also have a named role in quality with ELC), are concerned by the delays in or gaps between national inspection, and the delay in developing a single/shared inspection, and have felt it necessary to undertake local quality assurance.

It could not be clearer that the current system of quality assurance is not working and has led to a significant increase in duplicative quality assurance and paperwork which is not sustainable and is having a disproportionate effect on the childminding workforce. They are predominantly sole workers and are having to work, in many cases, up to 7 additional hours per week to support this, unpaid, in their own time (in the evenings and at weekends). This is time they should be able to spend with their own families and is in direct contrast to practitioners in nurseries or other larger settings who have the support of colleagues such as managers, finance, other practitioners, administrative and quality and are paid to undertake paperwork and quality assurance during working hours.

It is also very clear that the current model of inspection and quality assurance, based on what would be considered good practice in nurseries and developed primarily to evaluate practice for two to four year olds in receipt of funded ELC, is not appropriate for evaluating other forms of childcare against – particularly childminding which supports children from 0-12/16 years of age.

The childminding workforce has declined by 30% (1671 childminding businesses) with the loss of over 10,000 childminding spaces for children and families in the last five years during the expansion of ELC and the delivery of '1140 by 2020'. This is deeply worrying, but not surprising given that this increase in bureaucracy and paperwork has been found to be the main cause as to why childminders have left or are planning to leave our workforce. The crisis in our workforce which we had previously warned was coming is now here and an immediate response is required, as is major reform.

SCMA has presented a significant body of evidence in support of the changes needed for childminding, including our latest in-depth #TellSCMA Childminding & You Survey 2022 which obtained a response from 1263 of our members. There was a 45% response level and almost 1000 free-text comments, many detailed, demonstrating the level of engagement and how important this matter is to practicing childminders, children and families around Scotland. This survey captured a large amount of data and rich examples of what is and is not working and needs to change. It also presents a picture of a highly-experienced and committed workforce which cannot sustain the pressure, just needs this to stop and is overwhelmed by the unrealistic, duplicative demands of different statutory organisations which each believe their requirements are the most important and which need information already produced for others to be evidenced in their own ways and on their own paperwork. In simple terms, an entire industry of quality assurance has built up around ELC resulting in a loss of focus on the child, in favour of an over-emphasis on documentation which is disproportionate to childminding practice. SCMA has also previously asked the question "Who scrutinises the scrutiny bodies?", without response, and we believe our survey has provided some of this much-needed scrutiny.

We also recognise the real challenge in our leading nationally, in partnership with others, on activity aimed at recruiting more childminders into the workforce at a time when bureaucracy and paperwork are having such an adverse effect on retention and that if these are not reduced this will undermine this and future work on the recruitment of childminders into the workforce. Despite these challenges we believe passionately in childminding and in its importance to children and families - it is a very rewarding career. Summed up simply by a respondent to our survey –

"There is far too much paperwork. The only downside of the job".

We believe that the measures included in 'What Childminders Need in the Future' within this response need to be implemented in full and urgently, as we only have a narrow window of opportunity in which to do this. Our survey found that over half of childminders currently delivering funded ELC have already had to, or will need to, reduce their practice hours by a half- or full-day to be able to keep on top of the paperwork required for funded ELC (which will not be financially sustainable to their businesses) and that if the level of paperwork

doesn't reduce 53% of partner provider childminders believe it unlikely or very unlikely that they will still be delivering funded ELC in 2-3 years' time. As such, the responses to this survey provide both a plea for help (in making this stop) and a warning to policymakers (if they fail in acting on this).

The urgency for this action has also recently been recognised by the Scottish Parliament's Finance & Public Administration Committee, which in their letter of 4 October 2022 to the Deputy First Minister, John Swinney MSP, stated –

*"In their written submission to the Committee, the Scottish Childminding Association (SCMA) noted a 26% decline in the number of childminders over the last 5 years. Graeme McAlister of the SCMA explained that the main reason behind childminders leaving the workforce is the significant increase in bureaucracy and paperwork and the duplicative quality assurance at national and local levels, which has become unsustainable. Other areas of concern for the SCMA are the limited number of hours offered to childminders as part of blended placements and the lack of understanding and promotion of childminding as an option for funded ELC. The SCMA calls for a "proportionate, joined up and light touch" quality assurance process. This is echoed by Early Years Scotland, who calls for overall simplification of the process, a single inspection body for ELC and more active engagement with the PVI sector during the early stages. Despite assurances received from COSLA that there is no squeeze on partner provision at national level and changes are linked primarily to parent-demand, research commissioned by the Scottish Government confirmed that training, administrative demands and inspections are lead causes of the current decline in the childminding workforce. The Director of Early Learning and Childcare advised the Committee that the Scottish Government will be consulting on a shared inspection framework for the early learning and childcare sector as a whole, however, this work is at very early stage. **Given the decline in private and voluntary settings, and the challenges facing the wider labour market, the Committee recommends that the Scottish Government prioritises their work on the ELC inspection framework as a matter of urgency in order to ensure the sustainability of the sector**".*

This also has implications for the delivery of the Programme for Government, as childminders have considerable experience in caring for one year-olds and in school-age childcare, is an issue affecting the Private, Voluntary and Independent sector and has to become an absolute priority for the Scottish Government and ELC Directorate. We recognise that the Scottish Government cannot solve this problem alone and there is a need for all involved to accept individual and collective responsibility to work collaboratively to change where we are. This includes the Care Inspectorate, Education Scotland (and its successors), local authorities and their quality improvement and representative bodies, and sectoral/provider organisations. We are also realistic and appreciate this cannot be solved overnight and we need to agree what can be done in the short, medium and longer term to redress this problem.

COVID-19 presented many challenges, but it also showed that where organisations are committed, effective change can be actioned quickly. **The Scottish Government has shown leadership in launching this consultation, but needs to go much further and in addition to planning for the development of a single/shared inspection and framework, it should convene an emergency national summit of all involved stakeholders to agree what duplicative aspects of quality assurance can be reduced or, indeed, removed quickly; and to plan how we can reduce and rationalise the number of related frameworks and outcomes reporting, and against an agreed timescale for change.**

In the meantime SCMA will continue to support our members directly, and through our contracts with local authorities, with their current quality assurance needs to reduce pressure. We will also work with others committed to reducing the problems experienced by, and supporting, our workforce. SCMA will also continue to advocate our evidence-based position that quality assurance must become more joined-up, lighter-touch and proportionate to childminding.

For anyone in any doubt as to the need for major and urgent change, we'd like to conclude by presenting an overview of the situation, in childminders' own words, which were provided to us in survey responses.

Graeme McAlister
Chief Executive

26 October 2022

Future of Inspection: In Childminders' Own Words

Captured by #TellSCMA Childminding & You Survey 2022; representative snapshot of 994 comments.

About current inspection (and its focus):

"I find that it is not geared towards childminding at all. The system is really focused on nurseries"

"I feel we are being compared exactly with nursery provision and we are expected to do the same amount of paperwork but in our own time in the evenings and weekends..... this is not sustainable"

"Our clients want a home from home experience for their children to be loved and play. Inspections are in my opinion geared to structured nurseries"

"More emphasis on paperwork than my actual caring for children"

"My inspector was very nice but, in my opinion, compared me to an ELC setting with lots of staff or a nearby childminder with 4 assistants: completely out of touch with what the majority of us do as lone worker childminders".

"It has always felt very intimidating when a stranger comes in to judge you in your own home, the process is stressful and I feel like too much is expected from childminders".

About the current consistency of inspection:

"I find the inconsistencies from inspectors is so unprofessional. What one person thinks is good the next Inspector may not like. It is very opinion based in my experience with a lot of mixed messages"

"Lack of consistency with inspectors. Currently on my third inspector in 5 years. No relationship if need support"

"No two inspectors ask for the same thing. Some are looking for policies that others say are not required. Some want floor books, some don't. Some look at funded paperwork, some don't. It's so unfair"

"Different inspectors, different opinions".

"I am regularly in touch with the other childminders in my area and every inspector looks for different things"

"The requirements from one inspector to the next vary massively"

"Some inspectors care about the children, others about the paperwork"

"There needs to be clear understanding of what paperwork is required"

"A standard inspection would be good. Currently it is very dependent on the inspector and what their interest is, how they feel on the day".

About the current frequency of inspection and unannounced inspection:

"Childminders should not fear inspections, but we do. We are educated in our profession, but still inspectors come to our homes and disregard this, as they have little understanding of our profession".

"Unannounced inspections give me serious anxiety"

"I endured a 5 hour long unannounced inspection – far too long for such an intense interview style inspection while also having to meet the needs of 3 young children"

"I have not been inspected for nearly 7 years, meaning although I am working to current self-evaluation frameworks I have not had the benefit of CI feedback as yet. I am awaiting an inspection every day, but they never arrive. This is becoming quite unsettling. I feel it is unfair that I have had to wait such a long time while others receive multiple inspections. I recognise this is a reflection of my high grades, low CI risk assessment and zero complaints against my service, but feel inspections should be every 2 or 3 years to reassure providers they are properly on track"

About the current level of paperwork:

"I spend at least 1-2 days a week doing paperwork and am now reducing my working week to allow me to get all the paperwork done, as I can't keep up – meaning I can't offer full-time places anymore".

SCMA Response to Scottish Government consultation on the Future of Inspection

"It makes me ill thinking about all the paperwork"

"The paperwork is excessive and getting more each year"

"The answer to everything seems to be to produce another 'framework' usually a document that is far too long, complex and written by someone who clearly does not understand that childminding is about looking after the children not filling in paperwork of little relevance"

"Too much emphasis on paperwork, not enough on relationships with the children"

"It's enough!"

"The paperwork ... is overwhelming. Actually soul destroying".

"It all needs stopped"

"There is far too much paperwork. The only downside of the job".

"Constant duplication of e-mails, duplicate evidence of practice, duplicate contracts, duplication of everything that has already been inspected by CI"

"I spend several evenings a week and weekends catching up on paperwork, attending CPD courses or training sessions which is all unpaid and taking time away from my own family. I do not get 'time off the floor' to do this work or training as practitioners do in a nursery setting. Parents have little understanding – they think I start work when they drop their child off and finish when they pick up. I have parents wanting me to extend my hours – this is not possible if I'm to keep up with the work involved".

"Very disillusioned and I have been childminding for 17 years"

"To be honest I'm not sure what paperwork we're supposed to be doing".

About self-evaluation:

"I agree with and support the principle of self-evaluation, but find it hugely time consuming, massively increasing paperwork and study time on top of a week which is exhausting and has very long hours".

"I am yet to embark on the quality framework and self-evaluation. I spend an hour and a half after cleaning each night updating parents, completing feedback and attending training"

"I have briefly read the frameworks, but not in a position to do much with them as I am studying my SVQ3 which is taking up my time along with my weekly paperwork"

About the Future of Inspection:

"Childminding is completely different from a nursery setting and should be inspected that way"

"Keep it relevant, focused on the unique aspects of childminding compared to other forms of childcare, and professionals having an understanding of our job and the value of our role in the care of children and support offered to families within our service. It's not all about ticking boxes"

"Focus on supporting childminders to be the best they can be. Work with childminders to develop reporting templates so they accurately highlight what we do and how we do it. Get standard templates so we know what is expected and are inspected fairly by all inspectors, working from the same expectations. Give childminders the opportunity to send info across instead of putting them on the spot while they're trying to work".

"We need reformation".

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