



The Bridge
81 Southwark Bridge Road
London, SE1 0NQ

T 020 7940 7510
E info@familyandchildcaretrust.org
familyandchildcaretrust.org



Royal Court
81 Tweedy Road
Bromley, BR1 1TG

T 0300 003 0005
E info@pacey.org.uk
pacey.org.uk

House of Lords
London
SW1A 0PW

27 January 2014

Dear Member of the House of Lords,

Clause 74 of the Children and Families Bill: Childminder agencies

We write on behalf of the Professional Association for Childcare and Early Years (formerly the National Childminders Association) and the Family and Childcare Trust to raise our concerns about clause 74 of the Children and Families Bill and to urge you to vote against this clause.

Currently, childminders are required to register with, and are inspected by, the national education regulator Ofsted. Ofsted registration has successfully raised the quality of childminders and encompasses the processes necessary to safeguard children and ensure they receive a quality care and learning experience.

Through clause 74 of the Children and Families Bill the government proposes to enable new organisations—childminder agencies—to register and inspect childminders directly. The proposal has a number of problems:

- Childminder agencies would have a clear conflict of interest between marketing childcare services and objectively evaluating the quality of those services. This conflict is unacceptable in a regulatory framework designed to protect vulnerable young children.
- The assurance of Ofsted grades is key to parents' decision to use childminders. Removing this assurance will reduce consumer information, undermine parents' confidence in childminders and put parents at risk of inadvertently choosing low quality childcare.
- The government currently subsidises 90% of Ofsted registration costs, with a childminder paying £35 towards a registration process that costs £350. Commercial childminder agencies will not subsidise registration. This is likely to lead to higher costs for parents as childminders are forced to pass on increased costs.
- Local childminder quality networks are also subsidised by local government. Childminder agencies would not receive these subsidies and would need to meet these costs directly

by increasing fees for childminders. This could impact on quality as childminders who do not want, or cannot afford, to join an agency may be excluded from professional support.

- The childminder agency proposal does not address, and may exacerbate, the causes of the fall in childminder numbers—low wages and low professional status.

Clause 74 comes with significant risks, is unlikely to be successful in drawing new childminders to the profession and will do little to address the priorities for parents of quality and affordability. In the light of these criticisms, we urge peers to remove clause 74 from the Children and Families Bill.

We have attached a full briefing on the childminder agency proposal. Please do get in touch with any queries that you have—contact details can be found on the attached briefing.

Yours sincerely,



Anand Shukla
Chief Executive
Family and Childcare Trust



Liz Bayram
Chief Executive
PACEY