



Department
for Education

Consultation response form

Consultation closing date: 29 February 2016

Your comments must reach us by that date

**Wraparound and holiday
childcare - parents and
childcare provider 'rights to
request'**

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

The aim of this consultation is to gather views from interested parties on the departmental advice on how maintained schools, academies and free schools should respond to:

- a. parents' requests that the school that their child attends considers establishing wraparound and / or holiday childcare, and
- b. childcare providers' requests to use school facilities for wraparound and / or holiday provision at times when the school is not using them

The departmental advice sets out the principles guiding how schools should respond to these requests and the steps they should take. This advice aims to avoid imposing unnecessary burdens on schools and maintains school autonomy, whilst ensuring schools understand the basis on which they should be responding constructively to requests for wraparound childcare.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.	<input type="checkbox"/>
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Reason for confidentiality:

Name: Fiona Reddick

Please tick if you are responding on behalf of your organisation.

Name of Organisation (if applicable): Family Action

Address: Family Action, Unit 24 Angel Gate, City Road, Islington, London EC1V 2PT

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please insert an **X** into one of the following boxes which best describes you as a respondent.

<input type="checkbox"/> Parent or carer	<input type="checkbox"/> School governor	<input type="checkbox"/> Headteacher
<input type="checkbox"/> Teacher	<input type="checkbox"/> School Business Manager	<input type="checkbox"/> Local authority staff
<input type="checkbox"/> Childcare provider / manager	<input checked="" type="checkbox"/> Other	

Comments: Charity Programme Manager

Paragraph 19 of the advice sets out what parents are expected to do to make a request for the provision of wraparound or holiday childcare. On receiving a request schools may require information from parents about the amount of wraparound or holiday childcare they estimate they will use. While it is left for schools themselves to decide what process works best, there is an expectation that they should be clear with parents about the steps they will take, timescales and any information necessary to help the school make a decision. If the advice is not clear the department is keen to understand what might be included to make it clearer.

1 Is the process for parents lodging a request clear?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

Making parents aware:

- It would be useful to offer some examples of how to raise awareness (e.g. via internet, school newsletter, ongoing e-consultation) within the advice.
- The provision of childcare can have a direct influence on a school's pupil numbers (e.g. parents choosing one school over another because of its childcare provision). It should be made clear that the school will need a slightly different process to ensure prospective parents can also lodge their 'right to request' (e.g. open day/evening to gauge interest and discuss initial proposals).

Lodging requests:

- Writing letters and emails may put off parents with EAL or low literacy levels. It should be stressed in the advice that the methods used by schools to lodge requests will need to be inclusive for all parents. For example, permitting a parent to make a verbal request via a certain member of staff, who records a written request on a form and both parties sign it.

Right to request *more*:

The current 'right to request' proposal focuses, we feel, more on schools moving from providing no childcare, rather than modifying their existing provision to meet parent needs. It should be made clearer, for instance, that 'right to request' includes 'right to request more' provision. Examples include:

- Where schools provide childcare already for some year groups but not others (e.g. Year 1 upwards), parents can request that the school considers offering care for all year groups.
- If a school offers some childcare, such as a breakfast club, after-school club until 5pm but no holiday care, parents can request that the school considers offering

longer hours in the after-school club, as well as holiday care, to meet their needs.

Paragraphs 34 and 35 of the advice sets out what childcare providers are expected to do to request the use of school facilities for wraparound or holiday childcare. While it is left for schools themselves to decide what process works best there is an expectation that they should be clear with childcare providers about timescales and any information necessary to make a decision. If the advice is not clear the department is keen to understand what might be included to make it clearer.

2 Is the process for childcare providers lodging a request clear?

Yes No Not Sure

Comments:

It would be helpful if some example criteria were given in the advice, such as only providers that have a Good or Outstanding Ofsted rating or providers need to provide at least 3 references.

Paragraphs 21 and 22 of the advice set out the expectations of what schools should do to process a request from parents for wraparound or holiday childcare. While it is left for schools themselves to decide what process works best there is an expectation that they should be clear with parents about timescales and any information necessary to make a decision. If the advice is not clear the department is keen to understand what might be included to make it clearer for schools.

3 Is the advice on how a school should respond to a request from parents clear?

Yes No Not Sure

Comments:

Where the advice refers to 'communication to parents' this should also mention prospective parents.

Paragraph 36 of the advice set out the expectations of how schools should respond to a request from a childcare provider to use school facilities for wraparound or holiday childcare. While it is left for schools themselves to decide what process works best, there is an expectation that they should be clear with childcare providers about timescales and any information necessary to make a decision. If the advice is not clear the department is keen to understand what might be included to make it clearer.

4 Is the advice on how a school should respond to a request from a childcare provider clear?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

The advice should suggest that a school has a slightly different process for those providers already working with the school who wish to develop their provision further. For example a Children's Centre on the school site which is currently running 0-5 childcare may also request to run holiday and wraparound care for school-aged children.

Paragraph 23 of the advice sets out the expectation that schools should establish a minimum threshold for the number of requests that will trigger formal consideration of the requests. This is to ensure that the actions that a school takes are based on an appropriate level of demand.

5 Is the advice on setting a threshold helpful?

Agree

Disagree

Not sure

Comments:

It should be stressed that the school should consider carefully different types of childcare models and the different thresholds for each. For instance various models could include working in partnership with a childminder (partly on the school site) if there are low numbers, or a school or Private Voluntary and Independent (PVI) provider run breakfast and after-school club if there are higher numbers, with pupils joining another local school for the holiday care.

The importance of local mapping before setting a threshold should be made clear in the advice. This is because other local schools may be interested in working together to offer wraparound provision.

Paragraph 27 of the advice sets out three possible reasons why schools might reject parent requests. The department is keen to hear other suggestions of what else might be reasonable.

6 Other than those listed in the draft departmental advice, are there other circumstances in which it would be reasonable for a school to reject parental requests?

Yes

No

Not Sure

Comments:

The advice should include additional examples, such as where:

- there is already sufficient childcare in the area; or
- a private provider already operates from another local school and offers a walking bus or collects using a mini bus; or
- an external provider already provides an offsite childcare service to that school.

We think that schools may find it difficult to know how to respond in situations where the school's wraparound provision is already offered through a PVI or childminder, yet parents put in a request to the school for additional childcare. More guidance is required for what to do in such cases: who deals with requests? What should happen if, for example, the Children's Centre offering the term time wraparound childcare refuses to offer holiday provision?

Paragraph 38 of the advice sets out three possible reasons why schools may reject childcare provider requests. The department is keen to hear other suggestions of what else might be reasonable.

7 Other than those listed in the draft departmental advice, are there other circumstances in which it would be reasonable for schools to reject a provider request?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

Other circumstances that could be included are:

- where there are quality issues, such as a lack of experienced staff/management, inadequate business plans or an inadequate Ofsted rating
- where the agreed criteria are not fulfilled
- where TUPE would apply and the provider is not able to take on such obligations, such as if the school already employs staff to run before and after-school clubs and it is requested that another provider is commissioned to run full wraparound care

Paragraphs 29 and 30 of the advice sets out the expectation that schools themselves should consider delivering the wraparound or holiday childcare directly themselves, or work with other schools to 'host' the childcare or work with private and voluntary childcare organisations to provide it. These options are designed to offer schools the maximum flexibility in the model of delivery.

8 Are the delivery options that a school should consider for delivering wraparound or holiday childcare clear?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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Comments:

Schools could offer a blended approach. For instance:

- The school may choose to run before and after-school provision themselves and then commission a third-party provider to cover the holiday periods.
- The school could run the breakfast club, a PVI could be commissioned to run the after-school clubs, and families could be signposted to other local holiday programmes.

Paragraph 33 of the advice sets out a list of factors that schools may want to consider in arriving at a decision about how to deliver wraparound or holiday childcare. The department is keen to understand if there are additional factors that should be included.

9 Other than those listed in the draft departmental advice are there other factors that schools should consider in arriving at a decision about how to deliver wraparound or holiday childcare?

Yes No Not Sure

Comments:

Schools should consider whether it is appropriate to set up a separate charity or Community Interest Company to run the wraparound provision. This would enable the body to fundraise and apply for grants (e.g. for equipment to support inclusion).

They should also consider other practical issues, such as whether any maintenance or building work is required to the school over the school holidays.

Schools will need to examine staff contracts and amend job descriptions as required to enable existing staff to run the childcare provision where appropriate.

Schools should also consider what timings would suit them best. For instance would weekends be feasible and what start and end times should be imposed. This should also include consideration of how flexible this provision could be to enable full versus half day sessions for different parents, for example.

Paragraph 31 suggests that schools should discuss their plans with their local authority because of their statutory duty on the provision of childcare in the area. We will be

exploring with the local government sector the implications of this guidance, but the department would like to hear your views and receive evidence on any burdens for local authorities that it would create.

10 Do you think that this advice would create a new burden for local authorities? If so, what is your evidence for saying so?

Yes No Not Sure

Comments:

We do not feel that this advice would necessarily be an additional burden for Local Authorities as they already provide the kind of services described, however, recent cuts to Local Authority budgets may impact on the level of support that each Local Authority can provide.

A major achievement over the past few years has been the long term growth of wraparound and holiday childcare. This has led to a wealth of innovative practice and knowledge which we are keen to draw together. Please include examples of websites or other sources of information and help in the comment box.

11 Do you agree that it would be helpful if the departmental advice on how to respond to 'right to request' included links to websites with information and advice about how to provide and commission wraparound and holiday childcare?

Yes No Not Sure

Comments:

Our suggestions for additional links include:

- www.learning-exchange.org.uk (eg case studies, templates)
- www.outofschoolalliance.co.uk (eg policies, procedures)
- www.familyandchildcaretrust.org (eg childcare cost surveys, reports)

We look forward to hearing your views on the proposals in the draft advice document. Finally it would be helpful to know whether you have any other comments on the proposals set out in this consultation.

12 Do you have any other comments on the draft departmental advice to schools?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> No view
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Comments:

Some schools will not want to offer wraparound or holiday care and perceive a number of barriers to doing so, such as how to commission a provider. It is important to highlight the benefits of such provision – to the school, to the children and to the parents/carers – and highlight positive examples of where other schools have developed successful provision. This departmental advice could signpost to some case studies on the Learning Exchange: www.learning-exchange.org.uk

This advice could include a short example step-by-step diagram, to give schools an idea of a process they can follow and where they can find documentation to assist them at each stage. **Family Action has the experience and expertise, and is very willing to assist with this work.**

Schools could also tweak existing templates and documentation shared by other schools for mapping existing local provision, consulting with parents, liaising with the Local Authority, communicating with parents or commissioning a third party.

Finally, childcare provision must have the ability to change according to need – with new parents bringing different requirements. It is therefore important that schools are encouraged to regularly check and monitor levels of demand and respond to these.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.	<input type="checkbox"/>
E-mail address for acknowledgement:	

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please email: consultation.unit@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 29 February 2016

Send by post to: David Aickin, Early Years Team, 1st Floor, Department for Education, Great Smith Street, London SW1P 3BT

Send by e-mail to: Wraparound.CONSULTATION@education.gsi.gov.uk