



Llywodraeth Cymru  
Welsh Government

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Welsh Government  
Consultation – summary of response

## Professional Registration of the Childcare and Playwork Workforce

A summary of the responses to the consultation on professional  
registration of the childcare and playwork workforce

June 2024

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh  
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

## **Overview**

This document provides a summary of the responses to the consultation on professional registration of the childcare and playwork workforce. We would like to thank all respondents for sharing their views with us.

## **Action Required**

This document is for information only.

## **Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

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## **Additional copies**

This summary of responses and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Professional registration of the childcare and playwork workforce | GOV.WALES](#)

## **Contents**

Introduction .....	1
Proposal .....	1
Engagement.....	1
Overview of responses.....	1
Summary of responses .....	3
Question 1.....	3
Question 2.....	5
Question 3.....	7
Question 4.....	10
Question 5.....	14
Question 6.....	16
Question 7.....	17
Question 8.....	19
Question 9.....	19
Question 10.....	20
Conclusion .....	20
Next steps .....	21
List of respondents .....	23

## **Introduction**

The Deputy Minister for Social Services launched a [consultation](#) on professional registration of the childcare and playwork workforce on 30 November 2023 for a 14-week consultation period.

The consultation sought views from those managing or working in childcare and playwork settings across Wales on some fundamental questions regarding whether the childcare and playwork sector should have a workforce register and if so, who should be included in that register.

The consultation closed on 7 March 2024. This document presents the summary of responses to the consultation.

## **Proposal**

Respondents provided feedback on some fundamental questions including whether the childcare and playwork sector should have a workforce register and if so when this should happen and who should or should not be included in a childcare and playwork workforce register.

## **Engagement**

Views were invited as part of a 14-week consultation period between 30 November 2023 and 7 March 2024. The consultation was published on the consultation pages of the Welsh Government's website. Respondents were able to submit their views and comments on paper, by email or online, and in Welsh or English.

Responses from childcare and playwork umbrella organisations take stock of their engagement with the sector and has informed their responses.

Welsh Government held two engagement events on 6 and 19 February to encourage attendees to respond to the consultation and to answer any questions.

## **Overview of responses**

In total, the consultation received 202 responses, comprising full and partially completed responses. Of these 182 were provided via the online survey and 20 via email. 136 respondents wish to remain anonymous. Respondents were asked 'which of the following best describes you and which best describes your role'. The following graphs show the responses received (including those who may have a dual role).

Figure 1: Which of the following statements describes you?

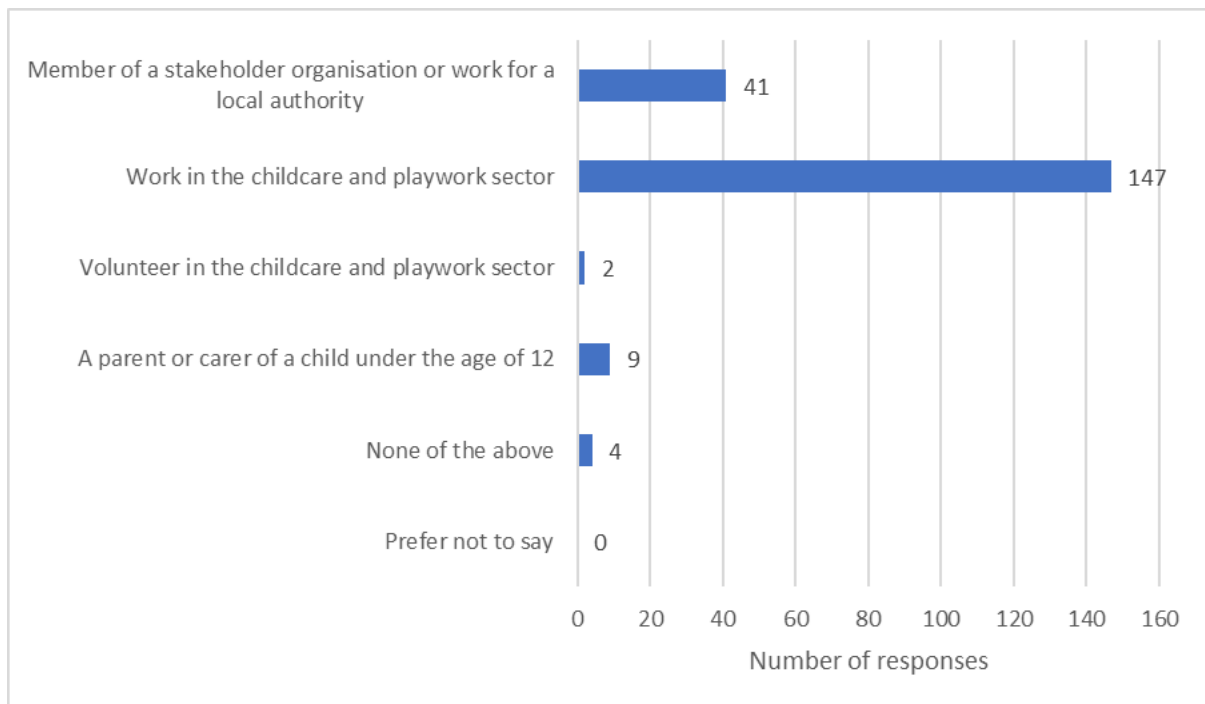
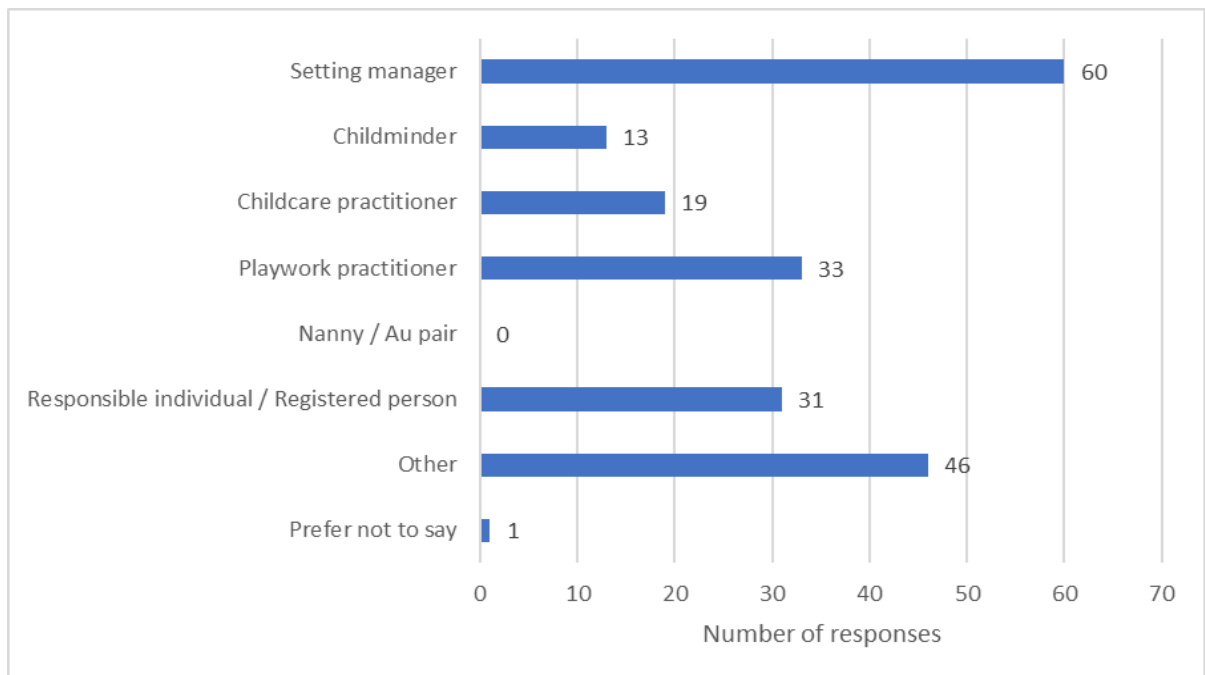


Figure 2: Which of the following best describes your role?



## Summary of responses

The following section details the responses and comments that were received in relation to the consultation questions.

**Question 1** asked whether a workforce register would offer benefits for *Those working in the childcare and playwork sector, Employers in the childcare and playwork sector and Families accessing the childcare and playwork sector.*

Respondents were also asked to explain how a register benefits these groups.

1. A workforce register would offer benefits for....	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Not sure
<i>1.1 Those working in the childcare and playwork sector</i>	47 <b>24%</b>	55 <b>28%</b>	39 <b>19%</b>	21 <b>11%</b>	32 <b>16%</b>	5 <b>2%</b>
<i>1.2 Employers in the childcare and playwork sector</i>	56 <b>28%</b>	64 <b>32%</b>	31 <b>16%</b>	17 <b>9%</b>	23 <b>12%</b>	6 <b>3%</b>
<i>1.3 Families accessing the childcare and playwork sector</i>	44 <b>22 %</b>	64 <b>32%</b>	43 <b>22%</b>	19 <b>10%</b>	21 <b>11%</b>	6 <b>3%</b>

There were a total of 199 responses to 1.1: 195 to 1.2 and 197 to 1.3.

More than half of all respondents **agreed or strongly agreed** that a workforce register would offer benefits for those working in the childcare and playwork sector (52%) for employers (60%) and for families (54%).

Approximately a quarter **disagreed or strongly disagreed** that it would bring benefits to the workforce (27%) and around a fifth felt there were no benefits for employers (21%) or families (21%). Very few respondents were **not sure** and there were approximately a fifth who **neither agreed or disagreed**.

Of those who **agreed or strongly agreed**, comments made on how a register benefits each of the groups listed included:

### Those working in the childcare and playwork sector

- Recognition as professionals, including playworkers and childminders;
- Parity with other sectors;
- Drive up standards, ensuring positive and effective conduct;
- Better access to CPD opportunities, career progression and a place to keep a record of all learning.

### Employers in the childcare and playwork sector

- Supporting employers with selection and recruitment;
- Creating a one-stop shop with access to qualifications and training records.

### Families accessing the childcare and playwork sector

- Greater assurance and confidence staff are up to date with relevant training and qualifications;
- Staff are professionally registered and therefore fit to practice and work with children in Wales;
- Improve safeguarding with staff working to a code of conduct;
- Would encourage parents to have trust in the system and to feel greater security around the workers they are leaving their children in the care of.

However, some respondents who agreed that there would be benefits also stressed the need for concerns to be addressed including the costs and burden on individuals/settings and the need for more detail on how a workforce register would work in practice e.g. how would this affect non-qualified staff/ensure the register was user friendly.

Some urged caution in taking this work forward now in consideration of the pressures the sector is facing and the potential to exacerbate recruitment and retention challenges.

Of those who **disagreed or strongly disagreed**, comments made by respondents on how they felt a register would *not* benefit those working in the childcare and playwork sector or employers included:

- Could further contribute to the recruitment and retention crisis;
- Negative impact on recruitment for part-time roles, particularly playworkers;
- Added financial pressure on individuals;
- Increase in administrative workload particularly if required to keep multiple registers up to date;
- DBS and CIW checks in place; extra layer of bureaucracy and cost for little tangible benefit;
- Dual registration; some staff already pay to be part of another register.

For families, comments included:

- Having a register would not affect decision on using childcare;
- Reading a CIW inspection report would be more beneficial to families than a register of staff.

Of those respondents who **neither agreed or disagreed**, comments highlighted the financial burden of registration fees; the need to ensure the views of open access playworkers are heard; and the benefits for each group listed would be dependent on what information the register would hold. It was also noted that a “one size fits all”

approach may not suit everyone e.g. childminders are already registered with CIW. Some also felt there were already sufficient safeguards and checks in place and that a greater priority would be to address workforce pay inequality.

For those who were **not sure**, comments included the need for more information to provide a more informed response e.g. the fitness to practice process. The low pay status of the sector was also highlighted as being at odds with the proposal to recognise it as a profession.

**Question 2** asked if workforce registration should be mandatory for those eligible. Respondents were also invited to share the rationale for their response.

2. Workforce registration should be <b>mandatory</b> for those eligible?	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Not sure
	44 <b>22%</b>	54 <b>27%</b>	35 <b>18%</b>	22 <b>11%</b>	38 <b>19%</b>	5 <b>2%</b>

There were a total of 198 responses to this question. Less than half (49%) **agreed or strongly agreed** that workforce registration should be mandatory with 30% who **disagreed or strongly disagreed**. Very few (2%) were **not sure** and less than a fifth (18%) **neither agreed or disagreed**.

Respondents were also asked to explain their rationale. Of those who **agreed or strongly agreed**, their reasoning included:

- To ensure consistency of expectation and transparency;
- To provide further opportunities for continuous improvement of practice;
- Becomes tokenistic if the register is not mandatory;
- To ensure a comprehensive list of those working within the sector in Wales;
- Would be an added safeguarding measure;
- Would help playwork to be seen as a profession not a passing through job role;
- People would not register otherwise.

Clybiau Plant Cymru Kids' Clubs said that it would ensure "*continuity and a consistent expectation/approach from Early Years to Education to Youth Work that provision is provided by a registered and professional workforce.*"

Social Care Wales **strongly agreed** that the workforce register should be mandatory outlining the potentially problematic and ineffective nature of a voluntary register. The Education Workforce Council also agreed that if introduced, it should be mandatory for relevant practitioners to join.



However, 13 respondents who **agreed or strongly agreed** that registration should be mandatory for those eligible also felt that consideration should be given to the following:

- All staff should be included on the register;
- It should be the individual's right to decide whether they want to pay the registration fees or not;
- Registration fees should be considered on a scale based on income or a reduction in fees/free if already paying to be part of another register;
- It should be rolled out to the sector over a period of time/a phased approach with an agreed date for all to be registered;
- For smaller organisations and sole workers i.e. childminders, fees and any additional work may cause a barrier;
- There should be exploration of how existing systems/databases could help avoid additional administrative burden;
- There should be consideration of an exemption for temporary playschemes, where people are only employed for a short period of time (such as school holidays);
- Voluntary registration could be considered for certain groups.

Community Trade Union agreed that a workforce register should be mandatory but stressed that the biggest barrier to this would be cost particularly when considering the low paid status of the workforce.

Of those who **disagreed or strongly disagreed**, comments made by respondents on why they felt registration should not be mandatory for those eligible included:

- Negative impact on workers at a time when recruitment and retention is an issue;
- Low salaries within the sector and additional cost implications, particularly for those who work part time, have low/zero-hour contracts or dual roles;
- An additional burden that is not needed until the sector is 'properly' funded;
- If already registered with CIW there should be no need to be registered anywhere else – unable to see the value of a workforce register;
- There should be incentives for those who choose to register;
- Concerns about data protection and who would be able to access the register.

Bishopston Play Association **strongly disagreed** stating that mandatory registration would have a negative implication in relation to regulated seasonal playwork provision.

Of those respondents who **neither agreed or disagreed**, comments highlighted the timing of this, in the midst of a cost of living crisis; cost implications with recognition of the low pay status of the workforce with managers not earning much more than staff; the issue of dual registration; current recruitment and retention issues - notably the recruitment of those in short term/holiday schemes particularly if the fees were the same as for those who worked year-round.

One respondent suggested that there should be tiered registration options/discounted rates for temporary staff. Another respondent noted that improved status could be achieved by improving salaries. It was also noted that more detailed information was needed to be able to reach a decision.

For those who were **not sure**, one respondent queried whether all staff proposed to be part of the workforce register should be included e.g. childminders and another queried whether improved pay would enhance status better than professional registration could.

**Question 3** asked for views on whether those listed at 3.1-3.3 **SHOULD** be included in a childcare and playwork workforce register.

3. The following <b>SHOULD</b> be included in a childcare and playwork workforce register	Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Not sure
3.1 All Staff in registered childcare settings who are paid to work directly with children	69 <b>35%</b>	55 <b>32 %</b>	24 <b>12%</b>	16 <b>8%</b>	29 <b>15%</b>	5 <b>2%</b>
3.2 All Staff in registered playwork settings who are paid to work directly with children	65 <b>33%</b>	59 <b>30%</b>	27 <b>14%</b>	14 <b>7%</b>	31 <b>16%</b>	2 <b>1%</b>
3.3 All Staff in registered childminder settings who are paid to work directly with children	69 <b>35%</b>	49 <b>25%</b>	25 <b>13%</b>	16 <b>8%</b>	30 <b>15%</b>	6 <b>3%</b>

There were a total of 198 responses to 3.1 and 3.2 and 195 to 3.3.

More than half (67%) of all respondents **strongly agreed or agreed** that all staff in registered childcare settings paid to work directly with children should be included in a workforce register. There were similar findings for 3.2 (staff in playwork settings) and 3.3 (staff in childminder settings) with 63% and 60% respectively reporting that they **strongly agreed or agreed**.

11 out of 19 childcare practitioner respondents **strongly agreed or agreed** that all staff in registered childcare settings should be included in a workforce register.

14 out of 33 playwork practitioner respondents **strongly agreed or agreed** that all staff in registered playwork settings should be included with one respondent stating that *“it will help playwork to be seen as a profession not a passing through job role”*.

Four out of 13 childminder respondents **strongly agreed or agreed** that all staff in registered childminder settings should be included.

Comments in agreement for the inclusion of all staff in registered childcare, playwork and childminder settings in a workforce register included:

- Provide and increase consistency;
- Professionalism and improved perception/status of the workforce;
- Provide parity of roles;
- Provide reassurance for those using services and the wider public;
- Opportunities for CPD.

Estyn agreed that all should be included stating that this *“is likely to increase consistency for professionals working within the sector and support agencies working alongside settings and services to develop the workforce in a more strategic and effective way.”*

However, some respondents who **agreed or strongly agreed** raised the following concerns:

- Exacerbation of recruitment and retention issues particularly in view of any dual registration requirements;
- Costs of registration in consideration of the low pay status of the workforce;
- The need for further information/consultation about how this will work in practice;
- All staff should have the opportunity to be part of a professional register for a consistent approach;
- Provided registration is not mandatory.

Community Trade Union agreed that all those listed above should be included in a childcare and playwork register *“with the correct fee structure and remuneration in place.”*

Less than a quarter (23%) of all respondents **strongly disagreed or disagreed** that all staff in registered childcare settings paid to work directly with children should be included in a workforce register. This was identical for 3.2 (staff in playwork settings)

and 3.3 (staff in childminder settings) with 23% also reporting that they **strongly disagreed or disagreed**.

Eight out of 19 childcare practitioner respondents **strongly disagreed or disagreed** that all staff in registered childcare settings should be included in a workforce register.

11 out of 33 playwork practitioner respondents **strongly disagreed or disagreed** that all staff in registered playwork settings should be included in a workforce register.

Seven out of 13 childminder respondents **strongly disagreed or disagreed**.

Comments against the inclusion of all staff in registered childcare, playwork and childminder settings in a workforce register included:

- Lack of perceived benefits above DBS and CIW checks already in place;
- Financial implications in relation to sustainability and as a barrier to recruitment and retention particularly considering the low paid status of the workforce;
- Timing of the proposal given the current pressures facing the sector;
- Additional paperwork and annual costs;
- Offers no benefit to the playwork workforce and would penalise registered playwork provision;
- No benefit to childminders who are already registered with CIW;
- It won't provide greater benefits in terms of what we already have in place as a childcare practitioner.

Of those respondents who **neither agreed or disagreed** comments highlighted that all workers should have to register to achieve consistency across the sector but charging for this would not be appropriate at this time.

In relation to the inclusion of staff in registered playwork settings, Play Wales raised their concern that the NMS and Exceptions Order reviews had implications which could see an increase in open access playworkers and mandatory registration for those on short term seasonal contracts. They felt this would need to be addressed in the first instance. Three out of seven playwork practitioner respondents who neither **agreed or disagreed** stated they could see benefits but had concerns around fees and the “*decrease in open access provision and availability of trained staff*”.

There was one playwork practitioner respondent who did not provide an answer to this question.

One of the two childminder respondents who neither **agreed or disagreed** with the inclusion of all staff in registered childminder settings stated that the only benefit would be to be recognised as professional childcare providers although they felt that instead of a workforce register, something could be added to the CIW inspection report to show families that childminders are “*professional childcare providers*”

PACEY Cymru were **not sure** if all staff in registered childminder settings who are paid to work directly with children should be included in a workforce register finding wider support via their engagement for the inclusion of childminder assistants who are not currently registered with CIW. They stressed that if a workforce register were to be introduced, the process/approach would need to be carefully considered and called for systems to “*link in some form for consistency and to reduce repetition for the childminder and the assistant.*” and that the introduction of a workforce register should take into account the “*specific needs of childminders and their regulatory position*” and “*should not create any additional burden for childminders working alone*”. PACEY Cymru also reiterated that costs and timing for their inclusion would need to be carefully considered - if a workforce register were established, they felt that childminders should be part of a later phase of implementation.

Early Years Wales were also **not sure** what further benefits a workforce register may bring and called for “*the difference between CIW's provider register and a practitioner register to be clearly communicated.*”

**Question 4** asked if those listed at 4.1-4.6 **SHOULD NOT** be included in a childcare and playwork workforce register?

4. The following <b>SHOULD NOT</b> be included in a childcare and playwork workforce register	Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Not sure
4.1 Staff working in unregistered childcare and playwork settings	23 <b>12%</b>	22 <b>11%</b>	43 <b>22%</b>	42 <b>21%</b>	50 <b>25%</b>	16 <b>8%</b>
4.2 Volunteers	36 <b>18%</b>	50 <b>25%</b>	42 <b>21%</b>	32 <b>16%</b>	22 <b>11%</b>	15 <b>8%</b>
4.3 Registered Persons/ Responsible Individuals who do not work directly with children	34 <b>30%</b>	39 <b>20%</b>	37 <b>19%</b>	44 <b>22%</b>	33 <b>17%</b>	9 <b>4%</b>
4.4 Students working in a voluntary capacity at a registered childcare and playwork setting	37 <b>19%</b>	61 <b>31%</b>	37 <b>19%</b>	31 <b>16%</b>	16 <b>8%</b>	14 <b>7%</b>
4.5 Staff, such as cleaners, who work	43 <b>22%</b>	68 <b>35%</b>	33 <b>17%</b>	25 <b>13%</b>	16 <b>8%</b>	9 <b>5%</b>

in registered childcare and playwork settings but not in direct contact with children						
4.6 Nannies	17 <b>9%</b>	26 <b>14%</b>	35 <b>18%</b>	54 <b>28%</b>	41 <b>21%</b>	17 <b>9%</b>

There were a total of 196 responses to 4.1, 197 to 4.2, 196 to 4.3 and 4.4, 194 to 4.5 and 190 to 4.6.

Half (50%) of all respondents **agreed or strongly agreed** that registered persons/responsible individuals and students **should not** be included in a childcare and playwork workforce register.

Over half (57%) **agreed or strongly agreed** that staff such as cleaners **should not** be included and just less than half (43%) **agreed or strongly agreed** that volunteers **should not** be included.

However, only 23% of respondents **agreed or strongly agreed** that nannies and staff working in unregistered childcare and playwork settings **should not** be included.

Although Mudiad Meithrin **agreed** that those working in unregistered settings should not be included, they stressed the need to identify the workforce in unregistered settings as there is currently no method of regulating those provisions.

### Nannies

Almost half (49%) **disagreed or strongly disagreed** that nannies **should not** be included in a childcare and playwork workforce register. Their reasoning included:

- Anyone working with children especially lone workers such as childminders and nannies should be included;
- A register would give assurance that nannies are suitably qualified and would improve data on nanny workforce numbers;
- Nannies who are registered as part of the Home Approval Scheme should be included.

Community Trade Union called for *“improved recognition and registration of nannies as a distinct part of the workforce.”*

PACEY Cymru recognised that *“the reality and practicalities”* of enforcing mandatory workforce registration for nannies *“would be challenging”* and proposed possible alternatives such as voluntary registration or making professional registration a requirement for the Approval of Home Childcare Providers (Wales) Scheme. The Vale of Glamorgan Council were of the same view.

Of those who **neither agreed or disagreed**, consideration of voluntary registration for some parts of the workforce was proposed.

Conwy County Borough Council said they were **not sure** if nannies should not be included and suggested that nannies could be given the opportunity to join if they fulfil appropriate criteria. Another said that the option to register should be available to all those who wish to join.

**There were no responses from nannies to the consultation.**

#### Staff working in unregistered childcare and playwork settings

46% **disagreed or strongly disagreed** that staff working in unregistered childcare and playwork settings **should not** be included. Their rationale included:

- All staff should be included whether the setting is registered or unregistered as it is a workforce register;
- Inclusion of staff working in unregistered settings would provide equity, consistency and a sense of fairness;
- Many workers in unregistered settings already have a required qualification to work in the sector and as such should be able to be part of a professional registered workforce;
- Unregistered settings cannot be ignored due to the valuable community-based provision and affordability it offers to parents.

Clybiau Plant Cymru Kids' Clubs argued for the inclusion of those working in unregistered settings *“There are currently 171 unregistered settings offering Out of School Childcare in Wales, employing an estimated 483 Playworkers. Not to include them within and acknowledge their professionalism, would be disenfranchising”*.

Carmarthenshire County Council felt that *“Workers should be given the same value and importance as those working in registered settings”*. with Flintshire County Council expressing their concern that *“they would be excluded as currently no method of regulation”*.

Of those who **neither agreed or disagreed**, Play Wales questioned the focus on registered settings when this would leave a significant part of the workforce out of scope of registration. If a workforce register were to be introduced for playworkers in registered settings, they called for further consideration to be given to the rationale not to include those in unregistered settings - the suggestion of voluntary registration for some parts of the workforce was also proposed. NDNA Cymru highlighted the importance of including all staff (registered and unregistered) for equity but acknowledged the difficulty in enforcing mandatory workforce registration for those in unregistered settings.

Merthyr County Borough Council who was **not sure** queried whether this could result in some choosing to remain unregistered to avoid the expense of registering.

### Registered Persons (RPs)/ Responsible Individuals (RIs) who do not work directly with children.

Just over a third (39%) of respondents **disagreed or strongly disagreed** that RPs/RIs **should not** be included in a workforce register. Comments stated that RP/RIs should be included regardless of whether they work directly with children as they are accountable for maintaining quality and safety and ensuring the setting remains compliant with the NMS and CIW. NDNA reasoned that as RPs/RIs are involved in childcare in a professional capacity then they should be included within a workforce register.

One respondent who was **not sure** raised the prospect of undertaking work to differentiate between those who may be in a setting and others who may be part of committee run provision. The Care Inspectorate Wales called for clarity in terms of what is meant by not working directly with children recognising that the situation for some RIs and RPs is “*more nuanced*” than for others.

### Volunteers

Over a quarter (27%) of respondents **disagreed or strongly disagreed** that volunteers **should not** be included. One commented that volunteers should be registered as they have direct access to children.

However, those who **neither agreed or disagreed** stated it would be dependent on their role. They also commented that volunteers would not ordinarily have any qualifications so until they have a qualification and are paid to work, they should not be included. One respondent did wonder if those who had been working towards a qualification should be included as it may help them secure employment in the future.

Of those who were **not sure**, one respondent felt they should be in scope in terms of CPD and progression but recognised the cost implications for the individual. Another respondent stated this would deter people from volunteering and valuable skills would be lost as a result.

### Students working in a voluntary capacity at a registered childcare and playwork setting.

Nearly a quarter (24%) of respondents **disagreed or strongly disagreed** that students **should not** be included. One respondent said that students should be registered as they have direct access to the children.

One person who neither **agreed or disagreed** stated that until they have a qualification and are paid, students should not need to pay to be on the register.

Of those who were **not sure** comments highlighted the potential short-term placement of a student who may not yet have decided whether to enter the workforce.



The Education Workforce Council were **not sure** whether students should not be included as they outlined different requirements for different groups of student registrants for them as a regulatory body.

Staff, such as cleaners, who work in registered childcare and playwork settings but not in direct contact with children.

21% of respondents **disagreed or strongly disagreed** that staff such as cleaners **should not** be included. One respondent felt they should be included as cleaners and cooks do have contact with the children.

Of those who were **not sure** one respondent said it was hard to define those who were not in direct contact with another stating that some could be included as they may be included in staff to child ratios.

**Question 5** asked whether Wales should have a workforce register.

5. Should a childcare and playwork register be established in Wales? Please explain your rationale?	Yes	No	Not sure
	91 <b>(46%)</b>	57 <b>(29%)</b>	49 <b>(25%)</b>

There were 198 responses to this question. Less than half (46%) of respondents **agreed** that a childcare and playwork register should be established in Wales. Over a quarter (29%) of respondents **disagreed** that a childcare and playwork register should be established with a quarter (25%) **not sure**.

Respondents were also asked to explain the rationale for their response. Of those who said **yes**, their reasoning in support of establishing a childcare and playwork register in Wales included:

- To support the promotion of childcare and playwork as a career;
- To provide parity of roles within the sector;
- To raise the profile and the public's perception of the importance of the role for future generations;
- To have a similar system to the Education Workforce Council (EWC) registration system currently used for education in Wales.

Mudiad Meithrin felt that the childcare and playwork sector is unique with the register *“an opportunity to celebrate and recognise the many skills, experience and expertise within the sector”*.

However, five respondents who agreed in principle with the establishment of a childcare and playwork register commented as follows:

- This should not be at the cost of childcare and playwork staff;
- A register should be free, and salaries should increase;

- Whether the money used to develop a register could be better spent to keep childcare providers sustainable.

Whilst Clybiau Plant Cymru Kids' Club supported the principle of a workforce register, they feel that it should also *"include unregistered childcare and playwork providers."*

Of the 25% who were **not sure** if a workforce register should be established, there were calls for more detail on what a workforce register would involve before a more definitive view could be reached.

Concerns were outlined including costs; current salaries, low pay, and unstable employment; the cost of living crisis; the timing of the proposal; recruitment and retention challenges; implications of the NMS and Exceptions Order reviews; those working in unregistered provision; the potential impact on open access playwork settings; mandatory registration for those on zero hours/short term/seasonal contracts; dual registration and the link between registers/codes of conduct.

Play Wales felt that the concerns they had outlined *"seem to outweigh the benefits"* and that these would need to be addressed to support a more informed decision for the sector.

NDNA reported that *"the sector is under enough pressure and stress as it is"* and that *"funding from the Welsh Government could be better deployed to support the sector"*. They also noted that *"many who were in favour of the register noted that their views were dependent upon Welsh Government funding the cost of registration"*.

PACEY Cymru also advised that this is coming at a *"challenging time for the sector"*. In recognition of the decline in the number of childminders, they said there is a *"need to ensure that any changes made do not destabilise the sector further or place additional cost and resource burden on providers."*

Early Years Wales noted that costs and administrative burden *"might be an unwelcome and untimely pressure to the sector"* and advised that *"until there is more clarity, it is difficult to argue for or against a register"*.

Of the 29% who responded **no** to establishing a childcare and playwork register in Wales, their reasoning included:

- Low salaries within the sector and additional cost implications;
- More barriers to recruitment and retention;
- Not a priority for the sector;
- Further debate needed on current funding rates;
- Should not be looking to increase the administrative workload for the sector;
- Professionalism cannot be measured by being on a list;
- Unable to see benefits;
- Monitoring arrangements are already in place via employers, Care Inspectorate Wales and DBS checks; how would this differ?

- Need to address concerns before any decision to include the seasonal playwork sector.

**Question 6** asked respondents to consider when a register should be developed.

6. If a childcare and playwork workforce register was to be developed, when do you think this should happen?	In the short term (register developed within 2-3 years)	In the medium term (register developed in 4-6 years)	In the long term (register developed in 7-10 years)	Not at all	Not sure
	72 <b>69%</b>	37 <b>18%</b>	15 <b>7%</b>	49 <b>25%</b>	26 <b>13%</b>

There were a total of 199 responses to this question. More than half (69%) of respondents responded that a childcare and playwork workforce register should be developed within 2-3 years (short term). Less than a quarter (18%) thought it should be developed in 4-6 years (medium term) and few (7%) thought it should be developed in 7-10 years (long term). A quarter (25%) felt that a workforce register should not be developed at all and 13% were not sure.

Respondents were also asked to explain their rationale. Of the 69% reporting a childcare and playwork workforce register should be developed in the **short term**, one reasoned that this should be prioritised and should be sooner rather than later. However, some cautioned that the current cost of living crisis and financial and staffing pressures should be taken into account with Estyn calling for consideration to be given to the impact of aspects such as dual registration on the sector. Another respondent called for a phased development where staff from one setting type are added initially so any issues can be addressed on a smaller scale.

Mudiad Meithrin outlined the need for a further consultation on the details of a workforce register if it is determined that one will be established. Both they, and another respondent also stressed the importance of this time also being used for promotion of a workforce register.

Of the 18% responding that a childcare and playwork workforce register should be developed in the **medium to long term**, reasoning included it would:

- Allow for further consideration of a register, engagement and discussions;
- Provide time to recover from effects of Covid-19;
- Recognise the fragility of the sector and current sustainability and recruitment and retention issues;
- Allow time to ensure benefits are evident;
- Allow for development and sharing of more detail including how a workforce register might look;
- Allow time for a phased introduction;
- Provide time to robustly assess the impact including financial impact.

The Education Workforce Council felt that development over the medium term would best reflect the time required for development of underpinning legislation for a workforce register.

Of those who felt that a workforce register should **not at all** be developed, comments included:

- A workforce register is not a priority for the sector;
- The financial implications and barriers to a sector already struggling to recruit;
- Issues with dual registration and DBS checks already in place;
- The need to evidence that the environment has changed significantly to support and sustain seasonal open access provision.

26 respondents (13%) were **unsure** when a workforce register should be developed. Their reasoning included:

- The need for more detail to provide a definitive view;
- The timing of the proposal in relation to current economic climate;
- Recruitment and retention and sustainability concerns for the sector;
- It may pose an additional burden to settings and staff;
- It is not felt to be a priority for the sector;
- The need to ensure there is clear agreement from the sector.

**Question 7** asked respondents for any further comments on the issue of workforce registration.

7. Do you have any other comments to make about developing a register for the childcare and playwork workforce?
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100 respondents provided other comments under the following key areas including:

### **Costs**

- Registration costs will be a concern for all affected – a register has to be affordable for staff with costs kept low as many workers in sector are low paid in comparison to other registered professionals;
- There should only be a one-off registration fee;
- Registration could be free of charge to start with a gradual introduction of fees advised;
- Settings or individuals should not have to pay;
- Potential hierarchy of costs could put some off from applying for promotion as little difference in salaries;
- Additional and ongoing investment from Welsh Government required;
- Costs to establish a register should be diverted to provide more support for staff training in Playwork, Safeguarding, First Aid etc.

### **Pay**

- Pay should improve to attract and retain staff - wages should increase in a sustainable way;

- An increase in salaries for the sector could be achieved through a complete review of the funding model and mechanisms for childcare funding support, early education, Childcare Offer and Flying Start.

### **Dual registration**

- Recognition of the cost implications where individuals with portfolio careers may need to register with multiple regulators;
- If a person is already registered with one regulator, there should be no need to include the registered person on the new register.

### **Benefits**

- Need to clearly identify, demonstrate and communicate the benefits, need and advantages of a workforce register e.g. access to training/CPD/incentives such as discount cards;
- Need to outline the benefits for those who are already registered with CIW e.g. would it provide opportunities for childminders to support childcare students?

### **Further information required**

- More detail about processes, criteria, requirements and costs e.g. would part time staff or staff who work in holiday schemes pay less; qualification requirements; period of grace for new recruits; who would be responsible for maintaining records and the need for more detail on the fitness to practice process and its implications;
- Support that could be provided for CPD;
- How systems will link to alleviate reporting/recording and avoid any unintended consequences.

In addition, some also called for the concerns they had highlighted throughout their response to be addressed before a workforce register for childcare and playwork could be considered e.g. the “vulnerability” of the sector and pressures on staff.

Bishopston Play Association stated that the childcare and playwork sectors should not have been combined for the purpose of the consultation and anticipated unintended consequences if a workforce register were to be established where remaining registered seasonal playwork provision could de-register or close to avoid professional registration.

Social Care Wales recognised that further work would be required on detail if a workforce register were to be established, however, they also proposed that it would be helpful to set out some areas in more detail at this stage to provide reassurance e.g. a period of grace, fees, and the fitness to practice process. The Education Workforce Council felt there is a need for clarity in relation to where practitioners are positioned in the wider workforce e.g. education or social care to determine the appropriate regulator(s).

**Question 8** asked respondents to consider the impact of developing a workforce register on the Welsh language.

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.

There were 107 responses to this question.

Comments included:

### **Positive**

- A register could include information on Welsh language skills and linguistic development of the workforce allowing improved data collection;
- It could assist with meeting targets of Welsh Government's Cymraeg 2050: Welsh language strategy and afford an opportunity to increase awareness of Welsh medium provision;
- It could also help assess language skills level and identify need for further support/training required;
- A register could assist with measuring the progress and promoting schemes such as Camau and Croesi'r Bont;
- A record of Welsh language skills could enable opportunities to target resources/support in areas where the workforce language skills may not meet the wider population needs;
- It would allow parents to search for Welsh medium childcare/playwork provision.

### **Negative**

- A register could potentially exacerbate recruitment and retention issues for Welsh speaking playworkers;
- Identifying Welsh speaking staff to develop Welsh medium provision is already an issue; if individuals had to pay to join a workforce register this could have a negative impact on the availability of Welsh language practitioners;
- 35% of Welsh medium Out of School Childcare Clubs are unregistered, employing approximately 166 Playworkers, who would not be recognised as professional if the register was only for those who work in CIW registered provision.

**Question 9** asked respondents to consider whether any changes to the proposals in the consultation would improve positive impacts on the Welsh language and mitigate any negative impacts.

9: In your opinion, could the proposal be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or

- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Many respondents referred to their response under Q8 or did not respond to this question. 46 did provide a response.

Comments included:

- A register should be accessible in both English and Welsh (equitable access) and offer supportive opportunities to achieve Welsh language levels with a database of courses included within the register;
- Encouraging more Welsh language alongside English would be useful as it would not be used less favourably as the children and staff would be able to understand, allowing the Welsh language to be built up over time;
- Cannot see any negatives in using the Welsh language as long as parents and carers are happy;
- Welsh Language is already well promoted in Wales.

**Question 10** provided the opportunity for respondents to raise any related issues.

10: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

There were 28 responses to this question.

There were few related issues raised under this question which had not already been raised in previous questions such as fees, the inclusion of unregistered settings, recruitment and retention challenges, dual registration, promotion of the benefits and questions about the processes involved in a workforce register. However, there were some considerations which had not been previously presented including:

- Any workforce register that is developed should offer support for developing necessary IT literacy skills;
- There should be continuous evaluation during the setting up of the register if it is taken forward;
- Need for a pragmatic and proportionate approach to ensure the sector fully supports any changes.

## Conclusion

The intention of this consultation was to seek views on the principle of a workforce register for the childcare and playwork workforce in Wales, who should be included in that register, and *if* a workforce register were to be established, when this should happen.

It is clear from responses received that the question of whether to develop a workforce register for childcare and playwork is complex. Even where there is support for a register, the support is qualified with the concerns outlined.

Although *the principle* of a workforce register may be welcomed by nearly half of all respondents, the support is cautious and dependent on how a register is developed and what the costs will be to workers.

In many cases, respondents felt that clarity about the many concerns raised would be required before a more definitive position could be reached. This could see a shift in the proportions welcoming a workforce register if, for example, the cost burden fell to those working in the sector.

The low pay status/cost of living was highlighted as a significant barrier to the establishment of a workforce register for the childcare and playwork sector despite recognition that other professionals are charged a fee to be recognised as professionals.

The timing of the consultation was raised in many responses. The sector was described as vulnerable, fragile and under immense pressure with sustainability issues of a more pressing concern. It was felt that this may affect how those working in the childcare and playwork sector feel about a workforce register at this time.

Similarly, the consultation responses were not definitive in respect of who should and should not be in scope of professional registration. For those the consultation proposed should be included, issues and concerns were raised particularly for those in playwork roles and for childminders who are already registered with CIW.

For those we suggested should be out of scope, there were strong feelings for the proposed non-inclusion of nannies, those working in unregistered settings and RIs/RPs with no definitive yes or no across all the responses.

In summary, it is clear from the consultation that there is a lack of consensus at this time for the development of a workforce register for the childcare and playwork workforce in Wales, with some significant concerns held across the sector.

## **Next steps**

Given the complexity of the issues and the fundamental concerns of the sector, Welsh Government will carefully consider next steps regarding the development of a childcare and playwork workforce register.

Any further work regarding a workforce register for the childcare and playwork workforce will need to involve exploration of the issues and concerns raised, to determine the most appropriate way forward for the sector or parts of the sector.

As the question of fees for individuals (however small) was so central to many responses, costs for the establishment and ongoing maintenance of a workforce register will need careful consideration before any decision can be made on next steps.



This work will need to take place before a further consultation on the proposed detail of a workforce register can be considered.

## **List of respondents <sup>1</sup>**

Akshay Vaidya

Alison

Alison Wicks, Alison Wicks Childminding

Amy Ferguson, Fun Foundations Day Nursery

Andrea Sysum, Torfaen County Borough Council Play Service

Angela Samuel, Little Rascals Preschool

Bethan Kay, Caerphilly County Borough Council

Bishopston Play Association

Care Inspectorate Wales

Carly Barker

Catherine Whelan

Childcare Unit, Ceredigion County Council

Chris Hole, Merthyr Tydfil County Borough Council

Churches Together in Wales

Clybiau Plant Cymru Kids' Clubs

Community Trade Union

Conwy County Borough Council, Early Years Childcare Team

Cytun

Danielle

Deanna Friend, Flying Start

Dionne Meredith, Daisy Day Nursery/Camp Coconuts

Early Years and Childcare Team, Swansea Council

Early Years Wales

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<sup>1</sup> It should be noted that this is not a comprehensive list of respondents, it only includes the respondents who did not wish their response to be anonymous.

Education Workforce Council

Estyn

Family Information Service Childcare and Play Team, Carmarthenshire County Council

Flintshire County Council

Helen Greenwood, Ysgol Feithrin Pontypwl

Jackie James, Clych Meithrin Trefeurig

Jane Hawkshaw, QT Consultancy

Jane Tariq, Childrens Play Service, Cardiff City Council

Joanne Stephens, JoJo's Childcare/Childminder

John Wright Turner, Sonic Out of School Club

Katie Llewellyn, Llewod Bach Childminding

Keri

Kiddies World

Laura

Leah Phillips, Daisy Day Nursery

Leanne, Flying Start Preschool

Lowri Gwyndaf Jones and Rachel Gwen Jones, Cyngor Gwynedd

Lynda

Matthew Jenkins

Melanie Morris, Flying Start

Merthyr Tydfil County Borough Council Early Years and Childcare Team

Michael John Donovan, Abigail's Day Nurseries Ltd.

Mudiad Meithrin

Nathania Minard, Conwy Play Team

National Day Nurseries Association

Patricia Joyce Roberts, Clwb Plant Llandegfan

Play Wales

Professional Association for Childcare and Early Years (PACEY Cymru)

Rebecca Gibbs, Clwb Cymer Ofal

Rhondda Cynon Taf Childcare Team

Sam Maitland-Price

Sarah Glover, Bonymaen Kids Play Initiative

Sarah Stedman, Registered Childminder

Sharon

Sian Jones

Social Care Wales

Stacy Bishop, Little Einsteins Academy

Vale of Glamorgan Council Early Years Development and Childcare Partnership

Victoria Johns, Little Bear Childminding

Vicky

Zoe Powell, Cylch Meithrin Gwdihw Brynithel