



# Faculty of Public Health

Of the Royal Colleges of Physicians of the United Kingdom

Working to improve the public's health

The Department for Education  
Sanctuary Buildings  
20 Great Smith Street  
London  
SW1P 3BT

06/06/2016

Dear Sir / Madam

## **UK Faculty of Public Health response to the Department for Education's consultation on the Childcare Free Entitlement: Delivery Model**

### **About the UK Faculty of Public Health**

The UK Faculty of Public Health (FPH) is committed to improving and protecting people's mental and physical health and wellbeing. FPH is a joint faculty of the three Royal Colleges of Public Health Physicians of the United Kingdom (London, Edinburgh and Glasgow). Our vision is for better health for all, where people are able to achieve their fullest potential for a healthy, fulfilling life through a fair and equitable society. We work to promote understanding and to drive improvements in public health policy and practice.

As the leading professional body for public health specialists in the UK, our members are trained to the highest possible standards of public health competence and practice – as set by FPH. With 3,300 members based in the UK and internationally, we work to develop knowledge and understanding, and to promote excellence in the field of public health. For more than 40 years we have been at the forefront of developing and expanding the public health workforce and profession.

### **Introduction**

The UK Faculty of Public Health welcomes this opportunity to respond to the Department for Education's consultation on the Childcare Free Entitlement: Delivery Model. FPH would be grateful if the Department for Education could consider the following two points.

### **Funding**

The Government's commitment to improving children's life chances, including through increased provision of free childcare for 3-4 year olds for working parents is welcome. However as highlighted on page 6 of the consultation document, 'getting the funding right is essential for the successful delivery of the extended entitlement'.<sup>1</sup>

It is also encouraging to see that the proposed framework provides a level of flexibility around the use of the entitled free childcare, such as at weekends or during the school holidays, that previously wasn't accounted for. However it is essential that sufficient funding is made available to local authorities to ensure that all eligible families are able to access and make use of the free childcare entitlement, particularly those in which the parent[s] work variable or unsecure hours, and are in jobs at the lower end of the labour market.<sup>2</sup>

FPH is disquieted that last November 50% of local authorities warned that they are not be able to meet neither the government's current childcare commitment's, nor the proposed target of 30-hours. Furthermore, this year so far an estimated 41,300 three year olds have missed out on free early education in England. 59 local authorities have stated they do not have enough places to cater for the demand, up from 23 in 2013.<sup>3, 4</sup>

<sup>1</sup> Department for Education. Childcare free entitlement: delivery model. 2016. Available at: <http://bit.ly/1NnEaSZ>

<sup>2</sup> Child Poverty Action Group. Join Inquiry into Foundation Years and the UK Government's Life Chances Strategy: CPAG's response. 2016. Available at: <http://bit.ly/1UBidQ4>

<sup>3</sup> Child Poverty Action Group. The Welfare Reform and Work Bill – Does it comply with human rights? Response to the Call for Evidence by the Joint Committee on Human Rights. 2015. Available at: <http://bit.ly/1r5Dd7a>

<sup>4</sup> Family and Childcare Trust. Childcare Survey 2016. 2016. Available at: <http://bit.ly/1oAwSzQ>

If the Government is truly committed to improving children's life chances, it is essential that local authorities are sufficiently funded to provide free, high quality childcare, which in turn would enable parents to work, train, study or prepare for work. This will particularly benefit households with two parents, as highlighted in figures from the Department for Work and Pensions, which show that for households where one or both parents work part-time the child poverty rate (after housing costs) is 56%, considerably higher than the 9% for households where one parent works full-time and the other part-time.<sup>5</sup>

### **Children aged two and under**

FPH is further concerned that there is still no free childcare provision for *all* children under two.

While commendable provisions have been made for two year olds in disadvantaged households, those with special educational needs, and those health and care plans; other families face substantial childcare costs, as made clear in The Family and Childcare Trust in their 2016 Childcare Survey. The survey highlighted the ever increasing costs of childcare for children under two, with a parent looking to send a child under two to nursery part-time expected to pay over £6,000 a year, up 1.1% since 2015.

Costs this high present a real and serious challenge for parents who may be just over the £16,190 threshold for eligibility, but struggle due to reduced total household income, as well as the work related conditionality requirements for Universal Credit.

### **Recommendations**

The proposed changes to childcare entitlement have the potential to substantially affect the life chances of a great many children in the UK. However it is essential that they are well funded and accessible to all families who require support with childcare, otherwise the changes may well cause more harm than good, as highlighted by Edward Melhuish's report for the National Audit Office.<sup>6</sup>

FPH makes the following recommendations to achieve the best outcomes for the children and families the changes are designed to benefit:

- Increase the funding available to local authorities, in order to enable them to build and maintain a professional, well provisioned early years workforce, capable of providing the 30-hour free childcare entitled to all eligible families in their jurisdiction;
- Extend the free childcare offer to all two-year-olds at an appropriate pace;
- Encourage socially-mixed settings (this would create environments in which children engage and learn from one another, while providing childcare providers opportunities to address funding challenges through cross-subsidisation from the fees of more affluent families.)

For more recommendations and insight on child poverty and the many issues facing childcare services, please see the Child Poverty Action Group's response to the Join Inquiry into Foundation Years and the UK Government's Life Chances Strategy

For further information from FPH, please contact FPH's Policy Officer

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Yours sincerely



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<sup>5</sup> Department of Work and Pensions. Households Below Average Income (HBAI) data 2013/14 Table 4.5db. 2015. Available at: <http://bit.ly/1KTv8pW>

<sup>6</sup> Edward. C. Melhuish. A literature review of the impact of early years provision on young children, with emphasis given to children from disadvantaged backgrounds. 2004. Available at: [https://www.nao.org.uk/wp-content/uploads/2004/02/268\\_literaturereview.pdf](https://www.nao.org.uk/wp-content/uploads/2004/02/268_literaturereview.pdf)