

## Consultation on inspecting childminder agencies

Most childminders currently working in England say that they want to stay independent of agencies – we know that they will cost parents and childminders money, we are happy with our businesses as they are now - and we value and do not want to lose our Ofsted grading and independence.

This newly released consultation is focussed on childminder agencies. However, we can use it as a useful tool to re-focus DfE and Ofsted on US – the childminders already out here working with children right now who need help, support and answers!

The consultation is here – closing date 21<sup>st</sup> March 2014 -

<http://www.ofsted.gov.uk/resources/inspecting-childminder-agencies-consultation-document>.

The way the consultation is worded is, in my opinion, flawed – DfE and Ofsted have put a lot of time and effort into setting up childminder agencies so they don't want it all wasted. The questions guide you to give the answers they want to hear. We need to see through that, read the guidance notes as well as the questions and be very careful what we agree to and how we reply.

First of all, let's take a look at the questions from the point of view of childminders who want to stay independent of agencies. How can we make ourselves heard and make this consultation work for us?

A little while ago, independent childminders wrote to DfE and Ofsted asking them to put US first!

Our letter is here - <http://www.childmindinghelp.co.uk/forum/independent-childminding-chat/127180-put-independent-childminders-first.html>

We can use the main points in this letter when completing the consultation... we have told DfE and Ofsted that we want ...

- Clarity and changes to the ways newly registering childminders are managed – this needs to be done through their Local Authorities so that registration remains cheap (or free);
- Confirmation about what Ofsted are going to charge us in the future;
- Support now that LAs are being disbanded;
- More support now that many of us are being asked to leave Children's Centres;
- More consistent Ofsted inspections – many of us are involved in the Ofsted Big Conversation – but many more need to make themselves heard;
- Clarity in Ofsted documentation so we are fully aware of the rules by which we are being graded;
- Clarity about what qualifications will be required in the future;
- Local sufficiency audits before new childminders and other provisions are opened to ensure currently registered childminders are not driven out of business;
- Changes to the desperately damaging complaint driven inspection regime;

- Reassurance for our parents that they will not have to pay more to use us – because if Ofsted charge us more, then our prices will have to go up as many of us are working on very low margins already;
- Reassurance about our futures...

Bearing all that in mind, let's look at the consultation questions and see what they are really saying...

**Question 1** - To what extent do you agree or disagree that we should give no notice of inspection to childminder agencies?

Inspection of childminder agencies is not really at the forefront of most childminder's minds right now. We need to resolve issues happening in our own inspections – we are being downgraded for ridiculous reasons, there is too much inconsistency and Ofsted are promoting a 'culture of fear' - Jenny Johnston, Kids Allowed, <http://www.kidsallowed.com/social/ofsted-their-new-culture-of-fear-and-why-it-is-dangerous-for-children/>.

It is not just childminders who are concerned about the way Ofsted are attacking providers – nurseries, pre-schools and children's centres are all part of the Ofsted Big Conversation - <http://www.thebigofstedconversation.co.uk/>. We are trying to engage Ofsted in useful discussions about what they are doing.

No notice inspections are important to get a true indication of what is happening in provisions – childminders, nurseries, pre-schools and agencies. However, surely the only way to observe that children are safe and well cared for is to continue to inspect the provider – not the agency! Otherwise in the opinion of many well respected childminders and early years commentators, it is a safeguarding and health catastrophe waiting to happen.

Another anomaly I couldn't quite work out - the consultation also says that inspectors will choose a sample of childminders who will be warned in advance that they are about to be inspected (probably to save wasted visits because many childminders work part time). However, it stands to reason that the agency will know they are about to be inspected if they are asked to contact their childminders to let them know about an impending inspection!

So do I agree that agencies should be given no notice inspections? Yes absolutely I agree – but I will also discuss why I feel that agencies will fail childminders and – more importantly – the children for whom they care – and how Ofsted needs to look to its current inspection information and get that right first.

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**Question 2** - To what extent do you agree or disagree that Ofsted should require inspectors to make an 'overall effectiveness' judgement on the overall quality of a childminder agency?

Individual childminder inspection is vital for many reasons – I have noted some of the reasons in response to question 1. An agency will make its employees look good and Ofsted will not see a true picture by inspecting the agency... or an agency will fail at inspection leaving its childminders without support.

The only way to note the 'overall effectiveness of the agency's services to childminders' is to inspect the individual childminders and talk to parents and as many children as possible during the inspection process. Parents who have been consulted also say that they want childminders to be individually inspected so that they can be assured of their quality.

Yes, of course, the agency will also need inspection – but they are not the ones delivering care and education to the children. I believe that this issue has to be addressed separately and urgently.

Do I agree that Ofsted should make an overall judgement on the overall quality of a childminding agency? No, I do not – and I will tick 'disagree' in answer to this question and include my comments about my concerns for the future – and how it will impact on the children.

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**Question 3** - To what extent do you agree or disagree that childminder agency inspection judgements should be made against this four-point scale?

If an agency is inspected in isolation and judged to be outstanding then great... but is that a fair reflection of the childminders who are employed by the agency? How will Ofsted ever know what the childminders who work for the agency are doing? I cannot find any information in any of the documentation about how complaints against providers will be made which is, in my opinion, a huge oversight.

Let's think for a moment about all this paperwork the agency will have to produce to prove it is outstanding. An agency which wants to do well at inspection will have outstanding paperwork in place, evidence of systems to monitor its childminders, evidence of how it helps its childminders to improve... they will employ staff who are dedicated to producing bits of paper for their childminders and the agency to use – people who can make paperwork look amazing.

But what about the childminders – and families – and more importantly the children? We all know that a good set of risk assessments or policies does not stop a child from getting hurt. We only have to remember the recent case at the nursery where the poor child died while staff were inside worrying about their paperwork –

'Prosecutor Robert Smith, QC, told the jury there was a 'tick-box mentality' at the nursery, with staff focusing on 'excellent' paperwork rather than ensuring safety rules were adhered to.'

Read more: <http://www.dailymail.co.uk/news/article-2540018/Toddler-three-left-20-minutes-dead-outside-neck-caught-rope.html>.

Then of course there is the other question – is the 4 point scale currently used robust enough? As part of the Ofsted Big Conversation, childminders and other early years providers are joining together and calling for Ofsted to reflect and make changes to its inspection system – including whether the 4 point scale is used appropriately.

As part of the OBC independent childminders are also asking what our inspections will be like in the future – consistency in inspections – clarity in documentation etc. Surely that is a bigger and more important question to us – the independent childminders of the future - than worrying about agency inspections!

Another concern to many independent childminders are the different agency models – will a 'one size fits all' inspection process be robust enough to ensure all models are supporting their childminders adequately? How well will Ofsted inspectors be trained to understand how the models work? The agencies will be big businesses – not childminders working from their own homes – the current inspection process is geared to childminders, nurseries, children's centres, pre-schools, children and parents – how much relevance will that have when they are inspecting a big, slick, well organised new business with staff who don't look after children – they sit all day producing paperwork!?

I will 'disagree' with this statement and I will explain why in the box. It's not because I disagree with the question in principle – it's because I disagree with the way it is phrased and what it is asking. I want every childminder to have a grade and to be monitored by Ofsted as we are now – so that every parent can be assured that their childminder is inspected by Ofsted – and I do not think that the current inspection system is in any way relevant for childminders.

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**Question 4** - To what extent do you agree or disagree that Ofsted's inspections should take into account the agency's ability to use self-evaluation to improve their practice?

We all acknowledge the importance of self-reflection – though many childminders still do not complete their Ofsted SEF - so at first glance this question seems like a no-brainer. Of course it's important!

My worry is that Ofsted, coming out to inspect the agency – will only look at the agency's self-evaluation – based on paperwork they produce and evidence they have concocted (as discussed in question 3).

What about all the childminders – will they need self-evaluation? Surely they are the ones who need it most because they are the ones who are working with the children every day.

And... what I want to keep coming back to over and over again! What about the children? Surely, self-evaluation is designed to support childminders in their work with children – to help us improve our systems and to help us reflect on what we are doing and keep children safer – and healthier – and better educated – and everything else we do every day.

How on earth does an agency – which employs a brilliant paperwork person – to reflect on its own systems - contribute to children's learning, development or wellbeing? And what format will the self-evaluation take? The Ofsted Big Conversation meetings have brought up inspection inconsistencies time and time again – the EYFS says childminders do not need to do the Ofsted SEF – but inspectors continue to ask for it during inspection. Will this be the same for agencies? Will they have to do self-evaluation? Will it be compulsory? This is not made clear.

My answer to question 4 is going to be 'disagree' and I will give my reasons in the box.

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**Question 5** - To what extent do you agree or disagree that Ofsted should incorporate the views of individual childminders and parents involved with agencies into the inspection evidence to contribute to its inspection judgements?

Well of course they should... shouldn't they? However, we are talking about agencies which employ childminders here – are they going to tell the truth – or are they going to worry about the agency throwing them out? What about the parents – they will not know any different – are they going to be honest about their feelings or are they going to worry about the agency removing them from their books?

Point 18 is also worrying (thank you to Kate for pointing it out) - 'By surveying a number of stakeholders, inspectors can gain a broad view of the childminder agency's services and can discuss any issues raised with the agency during its inspection.' So, Ofsted are not going to ask for the views of all the agency childminders and parents – just 'a number' of them. How many? And what about discussion direct with the childminders and parents – no, Ofsted will discuss them with the agency – who will, I am sure, if they are the slick business people I imagine they are going to be – have their answers ready.

I will 'disagree' with question 5 and I will explain that children must come first – and that the only way Ofsted can get a true reflection of a childminder is by visiting and inspecting the childminder – talking to the children – and talking to the parents.

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**Question 6** - To what extent do you agree or disagree that childminder agency inspection reports should be published on the Ofsted website?

Yes, I agree that reports should go on the website – but it won't stop me making a comment about putting children's safeguarding, safety, health, education etc first.

In the box provided I will ask DfE and Ofsted - what use will agency inspection reports be if Ofsted do not also inspect all the childminders who are part of the agency? Parents looking for a childminder should not have to take the agency's word for the quality of the childminder – an independent body should also regulate the childminder to ensure consistency of provision. The agency is not exactly going to be impartial about its childminders if it wants to get a good inspection result!

Please take the time to reply to this consultation! Please do not be sucked in to agreeing if you feel, like me, that the questions are misleading.

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<http://www.ofsted.gov.uk/resources/inspecting-childminder-agencies-consultation-document>.

Thank you.