

The Provision Of Early Learning And Childcare (Specified Children) (Scotland) Amendment Order 2020

Children's Rights And Wellbeing Impact Assessment

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The Provision of Early Learning and Childcare (Specified Children) (Scotland) Amendment Order 2020: Children’s Rights and Wellbeing Impact Assessment (CRWIA)

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Executive summary

In Scotland, all three and four year olds and eligible two year olds – those we believe will benefit most - have a statutory entitlement of up to 600 hours a year of funded ELC from the relevant start dates¹. Some children are also eligible for an additional year of funded ELC when they defer their entry to Primary 1 (P1) for a year.

All parents have the legal right to defer their child’s entry to primary school if they are not yet five years old at the beginning of the school year. In the current system, the youngest children (those with a January or February birth date) are eligible for an additional year of funded ELC when their parent has exercised their statutory right to delay their child’s school entry to P1 for a year.

Children who turn five years old between the August and December after the school commencement date can also be deferred, however, currently they do not have an automatic entitlement to funded ELC in that deferred year.

Local authorities have discretion over a further year of funded ELC for these children. The Scottish Government expects local authorities to make the decision about additional funded ELC for these children, based on an assessment of wellbeing, as set out in the Early Learning and Childcare statutory guidance² that accompanied the Children and Young People (Scotland) Act 2014.

This Order will remove this birth date related distinction, and entitle all children to a further year of funded ELC when their parents have decided to defer their entry to P1 for a year.

This CRWIA was undertaken to consider the impacts of this Order on children’s rights and wellbeing. This CRWIA process found that:

- This Order will have positive impacts on the following Articles from the United Nations Convention on the Rights of the Child (UNCRC):

Article 2 – Non-discrimination

Article 3 – Best Interests of the child

Article 5 – Parental Guidance and a child’s evolving capacities

Article 6 – Life, survival, and development

Article 12 – Respect for the views of the child

¹ Children and Young People (Scotland) Act 2014: <http://www.legislation.gov.uk/asp/2014/8/section/48>

² Early Learning and Childcare Statutory Guidance: <https://www.gov.scot/publications/early-learning-childcare-statutory-guidance/>

	<p>Article 18 – Parental responsibilities and state assistance Article 23 – Children with disabilities Article 28 – Right to education Article 29 – Goals of Education Article 31 – Leisure, play, and culture</p> <ul style="list-style-type: none"> • This Order will support public bodies in Scotland to meet their duties to safeguard, support and promote the wellbeing of children in their area particularly on Included and Achieving indicators. <p>We have been working with COSLA, local authorities and other stakeholders to consider implementation of the policy and we plan to continue to work with partners to consider any further learning e.g. from authorities that are already delivering this policy in part or in full, or those who adopt the policy in advance of August 2023 as a result of a local policy decision. We are considering opportunities to work with any authorities participating in early adoption of the obligation, including potential data collection and evaluation of the implementation process. Part of this work will assess communications and information approaches to support parental choice.</p> <p>When the policy is fully implemented, it is expected that the future ELC census, which will be fully established by 2022, will allow for more substantive research on how different families use ELC in a deferred year.</p> <p>By 2022, the census will be based on an individual child level collection, and will collect characteristics data on children accessing funded ELC, including: sex, ethnicity, disability status, whether the child has any additional support needs, and the home postcode of the child (to enable analysis by the Scottish Index of Multiple Deprivation).</p> <p>This should allow for more substantive analysis on how different families use funded ELC in a deferred year, and help to identify if there are any particular groups where uptake is significantly different and where the Scottish Government and local authorities may need to further explore why this is in order to establish whether policy adjustments should be made.</p>
Background	<p><u>Policy Background</u></p> <p>The overall objective of the Scottish Government’s policy on funded early learning and childcare (ELC) is to provide high quality, flexible ELC that is accessible and affordable for all families.</p>

	<p>In Scotland, all three and four year olds and eligible two year olds – those we believe will benefit most - have a statutory entitlement of up to 600 hours a year of funded ELC from the relevant start dates³.</p> <p>Some children are also eligible for an additional year of funded ELC when they defer their entry to Primary 1 (P1) for a year. All parents have the legal right to defer their child’s entry to primary school if they are not yet five years old at the beginning of the school year. In the current system, the youngest children (those with a January or February birth date) are eligible for an additional year of funded ELC when their parent has exercised their statutory right to delay their child’s school entry to P1 for a year.</p> <p>Children who turn five years old between the August and December after the school commencement date can also be deferred, however, they do not have an automatic entitlement to funded ELC in that deferred year. Local authorities have discretion over a further year of funded ELC for these children. The Scottish Government expects local authorities to make the decision about additional funded ELC for these children, based on an assessment of wellbeing, as set out in the Early Learning and Childcare statutory guidance⁴ that accompanied the Children and Young People (Scotland) Act 2014.</p> <p>The objective of The Provision of Early Learning and Childcare (Specified Children) (Scotland) Amendment Order 2020 is to entitle all children to funded ELC whose parents have decided to defer their entry to P1 for a year.</p> <p>This means that children who turn five years old between the August and December after the school commencement date, are entitled to an additional year of funded ELC automatically when their parent defers their school entry for a year. This brings the entitlement for these children in line with the entitlement that already exists for deferred children who turn five years old in January or February. The aim of amending the eligibility criteria as currently drafted is to ensure that parents decisions on whether to defer their child’s P1 entry can be based on the best interests of the child and not whether they automatically qualify for access to funded ELC.</p>
<p>Scope of the CRWIA, identifying the children and young people</p>	<p>The amendment will directly affect children who turn five years old between the August and December after the school commencement date, whose parents have chosen to defer their entry to P1 for a year. Once the amended duty is in force, this will entitle these children, in their deferred year, to the mandatory</p>

³ Children and Young People (Scotland) Act 2014: <http://www.legislation.gov.uk/asp/2014/8/section/48>

⁴ Early Learning and Childcare Statutory Guidance: <https://www.gov.scot/publications/early-learning-childcare-statutory-guidance/>

affected by the policy, and summarising the evidence base

amount of early learning and childcare that education authorities must provide to eligible children in their area, as set out in the Children and Young People (Scotland) Act 2014 (“the 2014 Act”).

Children are at the centre of the funded ELC offer in Scotland and are expected to be the chief beneficiary of the investment. Key elements of funded ELC policy that affects eligible children are:

- The focus on a **high quality** experience in funded ELC, supported by a professional and skilled workforce and underpinned by a National Standard for all funded providers, with quality standards at its core.
- A focus on **play-based** learning with opportunities for physical activity and outdoor learning
- Access to a **free meal** during every session
- Opportunities for **parents and carers to be involved** with their child’s learning and wider ELC experience.

Evidence base

Key data sources:

- Scottish Government ELC census⁵ which provides information on funded ELC. This includes data on the number of registrations for funded ELC, with information available on numbers by age, disability and additional support needs.
- The Scottish Pupil Census which collects individual-level data on publicly-funded schools and their pupils. Data is collected from all local authority and grant-aided schools and school centres. Analysis of the pupil census data⁶ was conducted by the Scottish Government in order to inform the understanding of trends and variations in deferral rates between 2014 and 2018, and the characteristics of pupils identified as having deferred entry to primary school. Analysis of the following characteristics is included: sex, Additional Support Needs (ASN) status, disability status, ethnicity, SIMD of the pupil’s home postcode, and local authority of the children to have deferred entry to primary school.
- Research Exploring parents’ views and use of Early Learning and Childcare in Scotland⁷. This was commissioned by the Scottish Government in 2017 and involved a nationally representative survey and follow up discussions with parents

⁵ Scottish Government: Funded early learning and childcare statistics in Scotland:

<https://www.gov.scot/collections/early-learning-and-childcare-statistics/>

⁶ Scottish Government: Deferred entry to primary school: statistics: <https://www.gov.scot/publications/deferred-entry-primary-school-statistics/>

⁷ Scottish Government: Exploring parents’ views and use of early learning and childcare in Scotland; 2018: <https://www.gov.scot/publications/exploring-parents-views-use-early-learning-childcare-scotland/>

and carers of children under the age of six about their use, views and experience of ELC. A total of 10,526 valid survey responses were submitted by parents. The research explored views and experiences across different parent groups.

The evidence indicates, and as discussed in more detail in our Equality Impact Assessment (EQIA) and Fairer Scotland Duty Assessment (FSDA), that this policy may have greater positive impacts on some groups of children than others on the basis of sex and disability, as evidence⁸ suggests that male pupils and disabled pupils are more likely to be deferred than female pupils and non-disabled pupils, respectively.

Through our Fairer Scotland Duty Assessment (FSDA), we have also found that this policy may potentially have a greater positive impact on those at higher risk of poverty. As is the long-standing legislative position, funded ELC hours must be free at the point of access regardless of which setting the hours are being delivered in. This Order will therefore mean that families of children with a birth date in August to December who defer will be able to make decisions for their children, based on what they feel is in the best interests of the child, without the financial barrier of additional ELC costs. The impact on families with children with August to December birth dates who defer who are on low income or live in poverty, will therefore be positive, as in the current system, they will be less likely to be able to afford an additional of funded ELC in a deferred year where discretionary funding was not granted by the local authority.

The process did identify that current uptake of statutory ELC for deferred children (i.e. children who defer with January and February birth dates) is higher from families from the least deprived areas. National and local government both have a role to play in making sure parents/carers are aware of their child's funded ELC entitlement. Although there is no obligation for parents to take up their child's ELC entitlement and the option to defer may not be taken by all parents, it will be important that all parents are aware of their children's entitlement to funded ELC and can make an informed decision for their child, to ensure that families from the least deprived areas do not benefit more from the policy change than families in the most deprived areas.

When the policy is fully implemented, it is expected that the future ELC census, which will be fully established by 2022, will allow for more substantive research on how different families use ELC in a deferred year and help to identify if there are any particular groups where uptake is significantly different and where the Scottish Government and local authorities may need to further explore why

⁸ Scottish Government: Deferred entry to primary school statistics: [file:///C:/Users/U444661/Downloads/deferred-entry-primary-school-statistics-2018%20\(4\).pdf](file:///C:/Users/U444661/Downloads/deferred-entry-primary-school-statistics-2018%20(4).pdf)

	<p>this is in order to establish whether policy adjustments should be made.</p>
<p>Children and young people's views and experiences</p>	<p>The Scottish Government had planned to carry out a formal consultation on this policy however, the ELC Directorate's work was reprioritised to the urgent response to the COVID-19 pandemic, meaning this could not be carried out.</p> <p>Despite not carrying out a formal consultation, the Scottish Government has discussed the introduction of the legislation to entitle all deferred children to funded ELC with a range of stakeholders, as outlined below:</p> <ul style="list-style-type: none"> • Convention of Scottish Local Authorities (COSLA) • Individual local authorities • Association of Directors of Education in Scotland (ADES) Early Years Network • ADES Resources Network • Working Group on ELC and Childcare Sector Recovery • Give Them Time Campaign • Scottish Government Policy Units and Education Scotland
<p>Key Findings, including an assessment of the impact on children's rights, and how the measure will contribute to children's wellbeing</p>	<p>Impacts of this Order on children's rights</p> <p>Impacts of this Order on children's rights have been summarised below based on the cluster groups the UN Committee on the Rights of the Child has organised the different Articles of the UNCRC:</p> <p><u>General principles of the UNCRC</u></p> <ul style="list-style-type: none"> • Article 2 – Non-discrimination - <i>Children should not be discriminated against in the enjoyment of their rights. No child should be discriminated against because of the situation or status of their parent/carer(s).</i> • Article 3 – Best Interests of the child - <i>Every decision and action taken relating to a child must be in their best interests. Governments must take all appropriate legislative and administrative measures to ensure that children have the protection and care necessary for their wellbeing - and that the institutions, services and facilities responsible for their care and protection conform with established standards.</i> • Article 6 – Life, survival, and development - <i>Every child has a right to life and to develop to their full potential.</i> • Article 12 – Respect for the views of the child - <i>Every child has a right to express their views and have them given due weight in accordance with their age and maturity. Children should be provided with the opportunity to be heard, either directly or through a representative or appropriate body.</i>

This Order will have positive impacts on all four general principles of the UNCRC.

This Order means that local authorities will have a statutory duty to secure funded ELC for children in their area who turn five years old between the August and December after the school commencement date whose parent has chosen to defer their P1 entry for a year. This will be regardless of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Currently, local authorities decide whether to provide funded ELC to these children in a deferred year.

The Scottish Government expects local authorities to make the decision about additional funded ELC for these children, based on an assessment of wellbeing, as set out in the Early Learning and Childcare statutory guidance⁹ that accompanied the Children and Young People (Scotland) Act 2014.

Allowing parents to defer their child's entry to school is a longstanding feature of the Scottish schools system and gives parents and carers greater flexibility and choice. However, the choice of access to funded ELC in the deferred year for children in their area who turn five years old between the August and December after the school commencement date rests with the local authority.

Removing the ELC eligibility distinction based on birth date that currently exists for ELC access in a deferred year, will support all parents, regardless of their situation or status, to make decisions on school deferral based on the best interest of their child and not on access to funded ELC.

Family environment and alternative care

- **Article 5 – Parental Guidance and a child's evolving capacities** - Governments must respect the rights, responsibilities and duties of parents and carers, as well as members of the extended family, to direct and guide the child in the exercise of their rights.
- **Article 18 (1,2) – Parental responsibilities and state assistance** - Parents, or legal guardians, have the primary responsibility for the upbringing and development of the child, and should always consider what is best for the child.

⁹ Early Learning and Childcare Statutory Guidance: <https://www.gov.scot/publications/early-learning-childcare-statutory-guidance/>

Governments must provide appropriate assistance to parents and carers to help them.

This Order will have positive impacts on Articles 5 and 18 (1,2). Parents already have a statutory right to defer their child's entry to P1 where they have not reached five years old on the school commencement date. However, for children who turn five years old between the August and December after the school commencement date who are deferred, the decision to provide funded ELC in that deferred year is the local authority's. This means that a parents decision to exercise their statutory right to defer their child's P1 entry, could be impacted by whether their local authority will offer the child funded ELC in the deferred year. By entitling these children to statutory funded ELC, parents will be supported to exercise their right to defer their child's P1 entry.

Disability, basic health and welfare

- **Article 18 (3) – Parental responsibilities and state assistance** - *Governments must take all appropriate measures to ensure the children of working parents have the right to benefit from childcare services and facilities.*

This Order will have a positive impact on Article 18(3) as this Order means more children are entitled to funded ELC, including children of working parents.

- **Article 23 – Children with disabilities** - *A disabled child has the right to enjoy a full and decent life in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community. Governments must recognise the right of the disabled child to special care, and ensure the disabled child has effective access to education, training, health care, rehabilitation, preparation for employment, and recreational opportunities.*

Data from the Scottish Study of Early Learning and Childcare¹⁰ show that at age four- and five-years old children with a long-term health condition or disability were more likely to demonstrate delayed development and to be assessed as having some behavioural difficulties than those without.

Evidence shows that children with a disability are more likely to defer P1 entry. In 2018, data from the pupil census¹¹ shows that:

¹⁰ Scottish Government: Scottish Study of Early Learning and Childcare - ELC leavers: phase 2 report; 2020: <https://www.gov.scot/publications/scottish-study-early-learning-childcare-elc-leavers-phase-2-report/>

¹¹ Scottish Government: Deferred entry to primary school statistics: [file:///C:/Users/U444661/Downloads/deferred-entry-primary-school-statistics-2018%20\(4\).pdf](file:///C:/Users/U444661/Downloads/deferred-entry-primary-school-statistics-2018%20(4).pdf)

- The estimated deferral rate is higher for pupils with a recorded disability (38%) than for those without (15%). 19% of pupils with a disability born in August to December and 77% born in January and February deferred, compared with 4% and 44% for pupils born in the same months without a recorded disability.
- Deferred pupils are more likely to have a disability than other P1 pupils. 1.0% of all deferred pupils in P1 have a disability. The rate of disability in this group is around six times as high compared to all P1 pupils excluding deferrals, of whom 0.2% have a disability. Among deferred pupils born in January and February, 0.8% have a disability. While for those born from August to December, 1.7% have a disability.

We do not have evidence on if these children accessed ELC in their deferred year and if they did, whether this was funded by the Scottish Government, funded by the local authority on a discretionary basis, or funded by the family. However, as families with a disabled child may be more likely to defer their child's P1 entry, this Order could have a disproportionately positive impact on this protected characteristic.

Education, leisure and cultural activities

- **Article 28 – Right to education** - *Every child has a right to education on the basis of equal opportunity. Primary education must be free. Secondary education must be available to every child, with financial assistance available in case of need. Information and guidance on education should be available to all. Governments should take measures to encourage regular attendance and reduce drop-out rates. School discipline should be administered in a manner consistent with the child's human dignity.*
- **Article 29 – Goals of Education** - *Education must aim to develop every child's personality, talents and abilities to their fullest potential. It must encourage the child's respect for human rights, their origins and identity, for other cultures around the world, and for the natural environment.*
- **Article 31 – Leisure, play, and culture** - *Every child has a right to rest and leisure, to engage in play and recreational activities, and to take part in a range of cultural and artistic activities.*

This Order will have positive impacts on Articles 28, 29, and 31. This Order means that local authorities will have a statutory duty to secure funded ELC for children in their area who turn five years old between the August and December after the school commencement date whose parent has chosen to defer their P1

entry for a year. This will be regardless of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Currently, local authorities decide whether to provide funded ELC to these children in a deferred year.

Quality is at the heart of funded ELC delivery in Scotland, and a key commitment of the ELC expansion is Funding Follows the Child. Funding Follows the Child allows parents to access their child's funded ELC entitlement from any provider in the public, private or third sector including childminders, who meets the National Standard, has a place available and is willing to enter into a contract with the local authority. The National Standard focuses on what children and their families can expect from their ELC experience, regardless of where they access their funded entitlement.

Despite the legal duty to deliver 1140 not being introduced from August 2020, following the publication of the Interim Guidance¹² on 30 July, it is expected that local authorities will continue to use the principles and criteria of Funding Follows the Child and the National Standard as a framework to shape local funded ELC delivery.

Development of children's cognitive development, health and wellbeing already underpins all aspects of practice in ELC. This is also emphasised through the National Standard such as Criteria 2, which ensures that providers of funded ELC must have Care Inspectorate quality evaluations which are good or better on the theme relating to quality of care and support; and must have a framework to support children's learning that is informed by national guidance and is appropriate to support individual children's development and learning focused on active learning through play. The National Standard also includes a requirement that funded ELC providers must have a framework to support children's learning that is focussed on active learning through play and a requirement that children must have daily access to outdoor play, including regular outdoor play in a natural environment.

Impacts of this Order on children's wellbeing

Section 96(2) of Children and Young People (Scotland) Act lists the eight wellbeing indicators, sometimes referred to by the acronym SHANARRI:

¹² Funding Follows the Child and the National Standard for early learning and childcare providers. Interim Guidance: <https://www.gov.scot/publications/funding-follows-the-child-and-the-national-standard-for-early-learning-and-childcare-providers-interim-guidance/>

- **Safe** – protected from abuse, neglect or harm at home, at school and in the community.
- **Healthy** – having the highest attainable standards of physical and mental health, access to suitable healthcare, and support in learning to make healthy and safe choices.
- **Achieving** – being supported and guided in learning and in the development of skills, confidence and self-esteem, at home, in school and in the community.
- **Nurtured** – having a nurturing place to live in a family setting, with additional help if needed, or, where this is not possible, in a suitable care setting.
- **Active** – having opportunities to take part in activities such as play, recreation and sport, which contribute to healthy growth and development, at home, in school and in the community.
- **Respected** – having the opportunity, along with carers, to be heard and involved in decisions that affect them.
- **Responsible** – having opportunities and encouragement to play active and responsible roles at home, in school and in the community, and where necessary, having appropriate guidance and supervision, being involved in decisions that affect them.
- **Included** – helping to overcome social, education, physical and economic inequalities, and being accepted as part of the community in which they live and learn.

This policy to entitle children with August to December birth dates to funded ELC in a deferred year will impact particularly on **Included** and **Achieving** indicators.

This policy aims to ensure that parents' decisions on whether to defer their child's P1 entry can be based on the best interests of the child and not whether they automatically qualify for access to funded ELC. This will therefore mean that families of children with a birth date in August to December who defer will be able to make decisions for their children, based on what they feel is in the best interests of the child, without additional ELC costs that may be a barrier for some families exercising their right to defer. This supports all families, regardless of their circumstances, to defer their child and access funded ELC in the deferred year, where they feel this will help to support their child to achieve their full potential.

More broadly, evidence from both UK and international studies of early learning and childcare programmes¹³, including our own Growing Up in Scotland Study¹⁴, supports the fact that all children, and especially those from disadvantaged backgrounds, can benefit in terms of social, emotional and educational outcomes from

¹³ Scobie G, Scott E: Rapid evidence review: Childcare quality and children's outcomes; 2017:

<http://www.healthscotland.scot/publications/rapid-evidence-review-childcare-quality-childrens-outcome>

¹⁴ Bromley C. Growing Up in Scotland: The impact of children's early activities on cognitive development.

Edinburgh: Scottish Government; 2009: <https://www.gov.scot/publications/growing-up-scotland-impact-childrens-early-activities-cognitive-development/>

	<p>attending high quality early learning and childcare. As part of NHS Scotland’s evaluability assessment of the ELC expansion programme, a theory of change was developed for the expansion programme and the model of potential beneficiaries. Outcomes for children are presented in Figure 1 of this paper¹⁵ which considers how we expect the expansion of ELC hours to contribute to improving children’s outcomes.</p>
<p>Monitoring and review</p>	<p>We will be setting up a Working Group to consider the implementation of the policy and we hope to learn from authorities that are already delivering this policy in part or in full, or those who adopt the policy in advance of August 2023 as a result of local policy decisions. We are considering opportunities to work with any authorities participating in early adoption of the obligation, including potential data collection and evaluation of the implementation process. Part of this work will assess communications and information approaches to support parental choice.</p> <p>When the policy is fully implemented, it is expected that the future ELC census, which will be fully established by 2022, will allow for more substantive research on how different families use ELC in a deferred year.</p> <p>By 2022, the census will be based on an individual child level collection, and will collect characteristics data on children accessing funded ELC, including: sex, ethnicity, disability status, whether the child has any additional support needs, and the home postcode of the child (to enable analysis by the Scottish Index of Multiple Deprivation).</p> <p>This should allow for more substantive analysis on how different families use funded ELC in a deferred year, and help to identify if there are any particular groups where uptake is significantly different and where the Scottish Government and local authorities may need to further explore why this is in order to establish whether policy adjustments should be made.</p>

¹⁵ McAdams R, Wason D, Anand N, Craig N, and Inglis J: Evaluability assessment of the expansion of early learning and childcare; 2017: http://www.healthscotland.scot/media/1445/evaluability-assessment-of-the-expansion-of-early-learning-and-childcare_english.pdf

Bill - Clause	Aims of measure	Likely to impact on . . .	Compliance with UNCRC requirements	Contribution to local duties to safeguard, support and promote child wellbeing
<p>The Provision of Early Learning and Childcare (Specified Children) (Scotland) Amendment Order 2020</p>	<p>The objective of The Provision of Early Learning and Childcare (Specified Children) (Scotland) Amendment Order 2020 is to entitle all children to funded ELC whose parents have decided to defer their entry to P1 for a year.</p> <p>This means that children who turn five years old between the August and December after the school commencement date, are entitled to an additional year of funded ELC automatically when their parent defers their school entry for a year. The aim of amending the eligibility criteria as currently drafted is to ensure that parents decisions on whether to defer their child's P1</p>	<p>The policy will affect children who turn five years old between the August and December after the school commencement date, whose parents have chosen to defer their entry to P1 for a year.</p>	<p>Will have positive impacts on the following UNCRC articles:</p> <p>Article 2 – Non-discrimination Article 3 – Best Interests of the child Article 5 – Parental Guidance and a child's evolving capacities Article 6 – Life, survival, and development Article 12 – Respect for the views of the child Article 18 – Parental responsibilities and state assistance Article 23 – Children with disabilities Article 28 – Right to education Article 29 – Goals of Education</p>	<p>This policy to entitle children with August to December birth dates to funded ELC in a deferred year will impact particularly on Included and Achieving indicators.</p>

	entry can be based on the best interests of the child and not whether they automatically qualify for access to funded ELC.		Article 31 – Leisure, play, and culture	
CRWIA Declaration				
Authorisation				
Policy lead Fran Iwanyckyj ELC Access and Parental Communications Policy Officer, Early Learning and Childcare		Date 3 December 2020		
Deputy Director or equivalent Alison Cumming Interim Director for Early Learning and Childcare		Date 2 December 2020		



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