

## **Childcare in Wales**

### **The Draft Child Minding and Day Care Exceptions (Wales) Order 2026 and the Proposal for a Voluntary Approval Scheme for Childcare, Playwork and Activity Providers**

#### **A Young Wales Engagement Summary Report – November 2025**

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Children in Wales is the national umbrella body for organisations and individuals who work with children, young people and their families in Wales.

Young Wales is a Children in Wales initiative that amplifies and supports the voices of children and young people across Wales to be heard, listened to and have influence in decisions that affect their lives; underpinned by the UNCRC and the Children and Young People's National Participation Standards. We aim to do this by ensuring that young people have opportunities to participate and raise issues that are important to them; ensuring their voices are heard by decision makers, policy officers, Welsh Government officials and Ministers.

Young Wales has an established history of driving children and young people's rights, engagement and participation agendas on a pan-Wales basis. We have a cohesive partnership approach to our work encompassing children, young people and partners from a range of sectors and organisations, in order to support children's rights and participation; ensuring that children and young people are at the centre of all decision making. Our focus is on enabling children and young people's voices to be heard and listened to throughout Wales. *'Having a Voice – Having a Choice.'*

## **Background**

This engagement with children and young people aimed to hear their thoughts on the Draft Child Minding and Day Care Exceptions (Wales) Order 2026 and the Proposal for a Voluntary Approval Scheme for Childcare, Playwork and Activity Providers.

Welsh Government wanted to hear children and young people's views on changes that were being proposed to how childcare, playwork and activities are registered in Wales. Welsh Government also sought to hear children and young people's views of the development of a proposed Voluntary Approval Scheme. The aim of this work is to ensure there are childcare, playwork and activity options available for families in Wales that meet their needs. Welsh Government wanted to know what children and young people consider to be important to use this to inform their work.

This engagement with children young people took place between September to November 2025.

The initial engagement plan was to have 2 online engagement sessions with children and young people between 10 to 14 years old from across Wales and an in-person engagement session with learners from a high school. At least 50 different settings/organisations were approached across Wales and across local authorities to invite children and young people to engage in an online engagement session. However, the uptake for the session was not encouraging.

The engagement plan was then revised to in-person sessions at 3 specific settings. Information about the settings and number of participants is provided below.

Setting	Dates	Number of Participants
Swansea	22 <sup>nd</sup> October 2025	12
Milford Haven	24 <sup>th</sup> October 2025	21
Powys	10 <sup>th</sup> November 2025	8

A total of 41 people participated and provided their input through this process.

## Methodology

The participation framework used for this project aimed to facilitate the optimum space for children and young peoples' voices to be heard as well as ensuring that impact and learning from the process is fed back to them to enable best practice in participation.

The engagement consisted of a 75-minute workshop that was delivered in 3 settings in Milford Haven, Powys and Swansea.

The sessions were designed to gather insights from the young people pertaining to their thoughts on some of the proposed changes to the Draft Child Minding and Day Care Exceptions (Wales) Order 2026 and the Proposal for a Voluntary Approval Scheme for Childcare, Playwork and Activity Providers.

The facilitator started off by introducing the topic of the engagement. The children and young people were then reminded about the contents of the Privacy Notice and their right to voluntary participation as well as information as per the notice provided. Once this was done, the engagement session began.

## Main Questions

This engagement sought to understand children and young people's views and feedback on 4 key areas:

1. Proposed changes to the regulations pertaining to coaching and tuition
2. Proposed changes to the regulations pertaining to children aged 2 and under
3. General views on what it means to be registered or unregistered
4. Introduction of a Voluntary Approval Scheme
5. The impact of these changes on people

In this section, we will look at the learnings for each key area of the consultation.

### Area 1: Proposed changes to the regulations pertaining to coaching and tuition

Most of the children and young people engaged had been a part of some form of coaching or tuition programme/activity. Some examples of activities they'd participated in include dance, gymnastics, football, arts and crafts, religious classes, language classes and others.

#### Swansea

Most of the children and young people who had experienced coaching and tuition activities were usually accompanied by a parent until at least the age of 5. One young person shared that they had attended Arabic school without a parent for 2 hours at age 3.

When asked if there should be different rules for coaching and childcare, the young people engaged were of the opinion that there should be different rules where for some it depended on certain factors such as age, activity and duration. Their rationale for this was the idea that coaching/tuition are often more physical/active type activities whereas daycare was seen as more of a caregiving, supervisory, sedentary experience with the main goal of keeping children safe.

For some young people, childcare was considered different as parents are usually not present whereas parents can often be present at coaching and tuition sessions. They did share that they felt that the hours should be limited for younger children as 2 hours was too long a period for children under 2.

There were differences of opinions on the duration that a person under 4 years old should be able to attend coaching sessions and whether registration should be required. For some, 2 hours felt like too long a period for younger children. Any programme longer than that should be registered. And what was viewed as higher risk

activities such as sports activities, in their opinion should require registration as opposed to nursery service providers who were seen as providing less risky activities.

Trust was identified as a key factor in decision-making. People who were family members or known to the parents via community ties were often considered more trustworthy compared to unknown/unfamiliar service providers. The young people also pointed out that decisions about the appropriate length of time for an activity would also be influenced on the level of trust that parents had on the person providing the services.

In terms of the age at which a child should be able to handle full day coaching/activities, the young people had mixed responses ranging from 8 to 10 to 12. The type of activity being discussed would influence their decision on whether a whole day would be okay. For example, a whole day of football got a resounding 'yes' whereas a whole day of mathematics was a sound 'no'. Some of the young people felt that the attendance could be all day if there were more than one activity to mix things up.

### **Milford Haven**

The young people at this session shared that childcare should have different rules compared to coaching and tuition. Childcare was viewed as taking care of a child whereas coaching and tuition were viewed as learning spaces.

According to them, childcare is also different because parents are generally not going to be present in that space. Whereas, with coaching, parents could be present if they wanted to. Some of the young people shared that in their opinion, if the parent of a child is not present, then the number of hours of the session/activities should be limited. Most agreed that there should be a two-hour limit for children 4 and under. Some young people shared that it should be okay to extend the timing if the parents provide consent to do so whereas for others, they felt that two hours was quite a short period of time.

Some of the young people felt that having different activities to break a long day would be welcome. One young person said that whether a break in the activity is necessary or helpful would depend on the duration of the session.

### **Powys**

Most of the children in Powys shared that they think the same rules should apply to everybody. A few of them said it depends on the type of activity and the duration that

the children and young people are there. For these children, they shared that there should be different rules if there are different activities involved.

They also shared that whether a parent was present at the premise of the activity along with the risk-levels of the activity would influence the type of rules that should be enforced. The presence of a parent would make the space safer. They added that if the parents are not present that certain additional safeguards or measure might need to be put in place. Physical activities like football with potential for accidents would be considered higher risk compared to babysitting.

One young person shared that they felt registration for coaching and tuition providers might be good “but it’s not helpful if there’s no follow up or things like that”.

For this younger age group, there seemed to be a sentiment that any service provider for children should be registered, even if they provide services for only two hours - “they should be registered regardless”. The rationale for these young people is that maybe if they are registered, it just means it is safer for the child. Requiring the coaching and tuition providers to register would also in the views of these children provide the parents with some reassurances that the “government have said they are recognised”.

For some of the children, they felt that if the service is for people under 4 years old for two hours or less, then not being registered is acceptable if there is a security camera in the premise. This way, if something happens, the security cameras can be accessed to ascertain what took place. The children also suggested that there should always be more than one adult in the room, depending on how many children are present. This was a way to ensure there’s some sort of check and balance when working with the children.

When thinking about all day coaching, most of the children felt it’s too long, especially for 4 year-olds. For some it depended on the activity. Most of them would prefer a break in between or a relaxing activity in between.

### ***In their own words:***

- *“I would say they should be registered even if it's only two hours, they should just be registered regardless.”*
- *“Coaches they definitely should be registering. They need a lot of time. I remember I did a football club outside of where we are. And I don't think it was registered like nobody the coaches, there's nothing to say that they're actually a football club. It could just be like, you roll up and you just go, yeah. And they're making you pay a lot for it.”*
- *“Think about if it's, for example, football, that could be quite a bit more dangerous for the child than just being babysitted for a couple of hours.”*



- *“If it's a physical sport, the parents should expect they might get hurt doing it like rugby or something. But you won't expect if they're doing like a day-care or something that they could get badly hurt unless they're just tripping.”*
- *“It depends. Because if it's like a bunch of little kids that are still going through teething, they do have a chance of maybe biting each other because they don't know what's right or wrong. But if it's for like 4 or 5-year-olds, you shouldn't really be getting severely hurt.”*
- *“I think they need to have be registered if they're doing, like, a business. But if they're not registered, then they do their business. I don't think they should really be allowed to do it at all.”*
- *“I think it's okay if it was not registered when it's like an art and craft club. But if they're not registered for contact activities then their parents might not really trust.”*
- *“People under 4 for two hours I don't think it's that bad if the person are not registered, as long as they have security cameras. Then if something happened, they can check the security camera to see what happened.”*
- *“There should be more than one person in the room, depending on how many numbers there are. Like if they don't respect, then you're going to want another person in there.”*
- *“I think children need to probably only do one day, a full day activity once a week. But if it's going to be a full day like from 9 to 5 is fine. Any earlier start than that or later end just, you know, children still have to spend time with their family or spend time at the house.”*

## **Area 2: Proposed changes to the regulations pertaining to children aged 2 and under**

### **Swansea**

Most of the young people in this group shared that a child aged 2 and below was too young to be left with someone other than their parents. In some instances, it would be more acceptable if there was a familiarity with the people who might be caring for the child, for example a family or known community member. Where these options are not available or accessible, they consider using a registered service a better option as registering helps give them a sense of legitimacy and a level of trust towards the service provider.

There were mixed views about the requirements for registration as most would prefer for the child to be care for by someone they know. It also came to light that older siblings often stepped in as informal babysitters for younger siblings/cousins. Where children under 2 were to participate in activities without their parent(s) being present, most of the young people preferred that registration should apply as it provided reassurance to the parents that their children would be in safe hands.

### **Milford Haven**

The young people in this setting had a range of views about the need for a parent to be present for activities that involved under 2-year-olds. For some of them, it is best for service providers to be registered if a parent will not be present. They wouldn't be able to trust someone with a young child if they are not registered. Being registered provides them with the reassurance that the child's safety will be ensured. For others, if the parent consent, then it should be okay for the child to be under the care of the service providers without the presence of a parent. On the aspect of requiring parents to be on the premise when dropping off under 2-year-olds, the young people who agreed with this explained that this would help ensure the safety of the child. Whereas for those who disagreed on the need for parents to be on the premise, their rational was that the parent could always drop by to check on the child when necessary without needing to be there at all times.

### **Powys**

For the children from this group, there was a resounding yes to requiring registration if there are no parents present. They further added that any activities that was more than

two hours should require the providers to be registered. If parents are within the premise, close by – in a different room, just a small corridor away, then it would be okay for some of them if there is no registration. However, this changes if the distance is like the distance of a long corridor and especially if the service provider is on their own, then registration should be necessary. The idea behind this is that a shorter distance would make it possible for parents to get to the room immediately should the young child need them.

For one child, if it is family providing the care/activity, then they should have to register as “family wouldn’t hurt the child”. However, for non-family, “it doesn’t matter if they are doing it for under 25 minutes, they need to be registered”.

In environments where the parents are present, they wouldn’t have to register as they will be watched by their parents. For example, “when a playgroup does a session in the sports hall for little ones, I don’t think they will have to register because parents are supervising and it is not all their responsibility. But if they are not registered and if parents aren’t there... family okay I get it, very, very close friends I get it. But if you’re a business that’s getting paid, I think you should register”.

For these children, it makes a difference if it’s family or friends. Another child had a slightly different view that “with younger children, with or without parents should be registered”

The group were in agreement that with children under two, if the parents are around, then the care might be better quality, because they’re observing.

#### ***In their own words:***

- *“If you’re doing a business or getting paid, I think you should have to be registered.”*
- *“If your parents are there and it’s like a playing department, then it’d be fine, but when you’re unregistered, like, if it’s like you and you’re not registered and no parents around, it’s pretty dangerous because your kids could get hurt and there’ll be no parents there. And like, if they’re unregistered, it’s a little bit more risky. Where if it’s like a family friend or family, I think it’ll be okay.”*
- *“If they’re not registered, they need someone either for adult to be with them to like watch through a window or something. So, it’s like a glass room, then they’ll be okay. But if they got some registered with some not registered, that’s fine because the person registered could keep an eye on them.”*
- *“Do teachers have to be registered? What if teachers do activities outside of school?”*
- *“The parents will be around if they get hurt or something. The parents will be there, they wouldn’t have to get their phone number to call them over. Because if they’re like out somewhere else, it’ll take them longer to get to the place that their*



*kids are at. So if they're around, something happens, especially with younger children, it's easier for parents to step right in."*

- *"Very similar to what she said, but if you, if like the parents in the room, I think it is very handy so they don't have to call because sometimes they have to put them, they have to put the kid, the child there so they, because they've got to go, I don't know, to another country to do works"*

### **Area 3: General views on what it means to be registered or unregistered**

#### **Swansea**

For the young people in this group, the understanding of registration involved the presence of safety measures, safeguarding, training/CPD, appropriate ratios and DBS checks.

For them background/DBS checks provided a sense of validation of the services provided along with accountability for ensuring safe and quality care for the children entrusted to their care. Providers who are registered are seen as having clear guidelines and rules to follow that played a role in ensuring the safety and wellbeing of the children.

Looking at what being unregistered meant to the young people, showed a sense of the providers potentially operating "illegally" and/or lacking proper qualifications. It was highlighted to the young people that unregistered in the context that we were looking at also included providers who by law were not required to register. There was an understanding that without being registered, providers would be allowed to provide a maximum of 2 hours care. One of the youth workers present gained a coaching licence through their organisation and now coaches the young people in cricket. Without a licence/registration, they understood sessions should be a maximum of 2 hours.

When discussing trust, for many of the young people they would trust people whom they know such as family and friends. Where the people may not be known or are not so familiar to them, qualifications increase trust compared with someone who is not qualified.

When asked what they thought provider need to do to be registered, the young people responded that providers would need to have safety and safeguarding measures in place. Registration that includes checks helped validate and legitimise the service providers in the eyes of parents.

## **Milford Haven**

The young people in this setting shared that being registered meant being recognised. A provider who is registered would likely be qualified for the role that they do – both paper qualifications along with having experience working with children. In their eyes, a provider who is registered shows that they are responsible and will likely be accountable. Registration also helps parents feel comfortable and reassured about the safety and wellbeing of their child.

In terms of some of the things that a registered provider might need to do, the young people share that there is a child to staff ratio that they must adhere to, especially where younger children are involved. This ratio will also need to be adhered to when providing care for children with disabilities, autism and/or ADHD. The young people also flagged that besides qualification and registration, it is also very important for people who work with children to have the right personality. “They need to be skilled in patience” was something that was shared a few times.

When asked about what being unregistered meant, the young people shared that an unregistered provider likely hasn’t got legal recognition to do the work that they do. They are likely to also be unqualified and inexperienced. As they are unregistered, they would not have completed the forms and checks that are required of registered providers such as certifications and DBS checks.

The absence of the check and balances provided in a registered framework, in the opinion of one young person made it “more of a risk that they could be violent” making it harder to trust an unregistered service provider.

## **Powys**

For the children from this group, being registered meant that the provider has written down to say that they provide specific services and “can take care of kids”. These people have told the government and parents that this is the work that they can do.

According to them, unregistered providers might not be taking all the necessary precautions to ensure the safety and wellbeing of the children under their care. So, “if something happens, they might not report back to tell the people who need to know” and they “may not watch the children properly”.

There’s an underlying feeling that unregistered providers might not follow certain rules. This despite having been given the explanation that there are some providers who are currently not required to register.

Overall, the children shared that they think unless the person is a family member, they should have to register if providing services for children.

***In their own words:***

- *“I think you should have to register – you should not have to be registered if you’re family. So, if I ask my aunty to come babysit me- that’s fine. But if it’s someone the child doesn’t know or if it’s like a babysitter, or even if they do know them, they should still be registered.”*
- *“A child might trust the family member a bit more, or the adult would trust the family member more. And to be honest, I don’t think a family member would do anything to a child.”*
- *“I don’t think family has to register. Say, me and half of my family went to somewhere that my younger brother can’t go. And we asked my uncle to watch him. I don’t think he would have to register or they would have to register because it’s only for one day, but if they’re doing it for a business and they’re looking after different people outside family, I think they have to register.”*
- *“I don’t think it really matters because sometimes you can be like, you booked it and then you forget. Oh, I forgot to ask a babysitter and then one of your family members are free. Okay.”*
- *“They shouldn’t really have to register like most. If they do every month, then they would have to register. But if they didn’t like one before now and can’t go with you, but you wouldn’t have to register.”*
- *“I think if you’re like paying someone to babysit, they should have to register because it’s just different to helping someone out. Yeah. Like paying and it’s most likely repeated action.”*

**Area 4: Introduction of a Voluntary Approval Scheme (VAS)**

**Swansea**

The young people in this group understood voluntary as “doing it for the love of the game”. There was some interest in an intermediate tier between being registered and unregistered,

To their understanding, to be a part of the VAS, the person should be 18 and above and needs to have passed a DBS check. They also recognised that to be a part of the VAS, providers would need to meet some basic criteria and while they Care Inspectorate Wales would be the body that oversees this, they would not be doing any inspections of the providers and their premises.

For the young people though, a provider being a part of the VAS would not make a difference to them as they would trust a provider until proven otherwise.

### **Milford Haven**

We introduced the concept of the VAS to the young people. The young people shared that the scheme would be a good step to encourage providers to work towards full registration. The VAS could be something useful for music and mathematics teachers. The young people did flag that it would be important to consider the background of the applicants – when if it is voluntary, it would be important to ensure they are suitable for the work that they are doing, especially with children. In the absence of a full registration, the VAS could help parents trust the providers more as it is recognised by the government. It was also raised that if the VAS is introduced, it will need to be well advertised to encourage more people to join.

### **Powys**

The children in this group thought the VAS would be useful for people who are not already registered. A few of them shared that the VAS would likely be of interest to small groups that are just getting started, such as volunteer groups and different groups of people in Powys who run activities for children.

One thing that was flagged was to ensure that when putting the VAS into place, the safety of children is considered in all aspects. A specific ask was to ensure they “don’t have weapon type things in the space”. The children also shared that it would be important to check that the people do not have a criminal record. “It just keeps the child safer”.

According to one child, we should be “encouraging people by telling them that they were probably like the preferred people to go to if they are registered”.

### ***In their own words:***

- *“Small groups that are just getting started – volunteer groups” (might be interested in the VAS)*
- *“People who are exploring new things”*
- *“Teachers who are doing activities out of school might want to join”*
- *“I would say about that voluntary – not voluntary but should be properly registered”*
- *“People who are doing the volunteering, we need to check and make sure they don’t have that weapon type things and all that – like really really sharp knives”*
- *“And if that shows it on there (the VAS), like a thing that says, I want to babysit your child, if it shows that, they’re more likely to get a job than if they just do without it”*

### **Area 5: The impact of these changes on people**

When looking at impact of the proposed changes on people, these were some of the points raised by the children and young people who participated in this engagement.

#### **Risks**

Some of the potential risks identified were that the changes could make it harder for families to access care if service providers were made to register as this could influence how much it costs. The children and young people assessed that this requirement, even with a voluntary programme could increase the costs making it difficult for people to afford these services for their children. Speaking of risks, the participants from the younger age group were quite concerned about the dangers of certain activities, especially for younger aged children. One child flagged that it was important for anyone providing services or activities for children to undergo a background check “in case they did something illegal”.

#### **Costs**

Across the board, the children and young people flagged the likelihood of the costs to access these services increasing as if anyone had to register, it might make it more expensive for providers to offer their services leading to them increasing their prices. There were concerns about registrations and its accompanying cost and how this would affect the money that providers could invest into their actual work. It was said that providers could lose money for resources, resulting in parents paying fees that were “more expensive than actual work”. Even with the explanations of how the VAS could potentially support families to access support, concerns about the costs ranked high among the children and young people.

## **Benefits**

While there were concerns that some of the changes alongside a VAS might have a fee leading to increased costs, the children and young people could also see the potential benefits of the proposed changes. For example, there was recognition that the changes would make these services safer for children and young people, particularly younger children. A VAS programme would in many of their opinions increase the sense of trustworthiness of parents towards the providers as even though it isn't a full registration, there are some basic requirements that need to be met. Increasing the number of people who are recognised by the "government" would make parent's lives easier as it increased their options of "trusted providers". Some of the young people also said that the VAS could also give providers the opportunity to strengthen their social and life skills., even providing opportunities for work experience.

## **Welsh Language**

The children and young people either didn't have a lot of thoughts on how these changes could impact the Welsh language or they thought that it wouldn't have an impact on the Welsh language. One young person noted that "if people learn Welsh, it's easier to get jobs". The younger participants didn't think these changes would impact the Welsh language but were very enthusiastic about getting the message across that they wanted more Welsh language/Welsh clubs and activities to be made available to them.

## **People's Lives**

The children and young people shared that the proposed changes could have an impact on different aspects of people's lives such as on the cost of living ("money problems") if fees/payments were to increase due to the changes; it might increase worries in their life and potentially impact their families/ children and young people's families.

They also shared that having service providers registered themselves or even sign on to a voluntary approval scheme could help increase the trust that parents have in the service providers that they children are in safe hands, particularly for younger age groups.

One young person shared that they hope the changes would help create more clubs for people with disabilities.

## **Summary**

The young people shared a range of opinions on the topics discussed with some similarities across the groups and some distinct views in certain groups.

While there is a general sense of being able to trust registered service providers, among some young people, trust was something that was earned, often given to people whom they know or are familiar with. Only in the absence of this choice do they look at registration as a reason to trust. While for some young people, being registered and recognised by a government body, enabled them to trust the providers with the belief that they would only be registered if they have passed the vetting processes and the necessary requirement.

The age of the children and young people appears to be an influencing factor in their views. For the younger children, safety was a high priority as evidenced by their responses and examples. Interestingly, there also appeared to be more trust towards family members and the belief that children are safe with family and adults that they know because these adults aren't likely to hurt them, as compared to a stranger or lesser-known adult. There is a slight crossover in this aspect where the young people from Swansea shared that they were more likely to trust family and community members known to them even if there were registered providers.

The type of activity and perceived levels of risk associated with certain activities played an important role for many of the young people when determining if a provider should be required to register themselves indicating that the concept of safety was seen through different lenses for different young people, subsequently influencing their understanding of the benefits of a registered versus unregistered provider. Their understanding of safety was also influenced by several factors such as their age, type of activity, location, duration amongst others.

For some young people, clarity about expectations and understanding by parents of the risks involved in the activities were considered to be important factors in decision-making connected to the safety and wellbeing of children and young people.

The changing rules, unless communicated clearly may complicate choices for parents, while over-simplified rules may increase risks.

The potential implications of the proposed changes to the cost of accessing the various services was an important recurring theme among all the children and young people that we engaged with. Clarity about this will be crucial to ensure the buy-in of the parents when any change take place.