



Llywodraeth Cymru  
Welsh Government

**Number: WG53699**

## Welsh Government Consultation – summary of response

Proposed Changes to the National Minimum Standards (NMS) for Regulated  
Childcare for children up to 12 years of age - 2025

This document provides a summary of the responses to the consultation in 2025 on  
the proposals to change relevant standards within the NMS.

March 2026

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**

The 2025 consultation on proposed changes to the National Minimum Standards for regulated childcare sets out proposed changes to the format and particular standards. This document provides a summary of the responses to the consultation. 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 response 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: [National Minimum Standards \(NMS\) for Regulated Childcare: Proposed changes 2025](#)

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## Introduction

The National Minimum Standards for Regulated Childcare (NMS) apply to child minders and providers of day care for children up to the age of 12 years. They cover a wide range of different types of childcare provision, including child minding, crèche, full day and sessional day care, out of school childcare and open access play provision. The NMS are designed to assist providers in meeting the [Child Minding and Day Care Regulations \(2010\)](#) as amended.

The Minister for Children and Social Care published a consultation on the NMS on 17 September 2025 for a period of 12 weeks.

The consultation set out to seek views on proposed changes to the NMS as a result of recommendations from the: [Review of the National Minimum Standards for Regulated Childcare \(2019\)](#); [Ministerial Review of Play \(MRoP\) Report \(2023\)](#); and, the [Independent Review of Child Minding \(2023\)](#), along with information gathered during pre-consultation events with the sector.

Engagement questions were also asked as part of the consultation to help inform future policy work and to provide an update on areas of work in development.

The consultation concluded on 10 December 2025. This document presents the summary of responses to the consultation.

## 1. Proposals

Respondents provided feedback on the following proposed changes to the NMS as well as views on whether there were any other changes that Welsh Government should be making to the updated NMS and associated guidance.

The following parts of the NMS were consulted upon:

### 1.1 Structure and layout of the National Minimum Standards

In response to recommendations made in the NMS review 2019, we consulted on an exemplar of one of the standards (Standard 12 Food and Drink) to show how the NMS could be presented on [www.gov.wales](http://www.gov.wales) to improve structure, layout and user experience.

### 1.2 High quality provision, update to the: *What do we mean by high quality provision* chapter?

As part of the longer-term vision for Early Childhood Play Learning and Care (ECPLC), a proposal to update the introduction chapter in the NMS - "*What do we mean by High Quality Provision*", was included to further strengthen information and requirements with regards to quality, helping to embed a children's rights approach to policy making.

### **1.3 Definition of open access play**

An updated definition of open access play was developed and consulted on following recommendation 11.3 of the Ministerial Review of Play (MRoP) Report.

### **1.4 Open access play**

Two proposals were developed to support more proportionate standards for open access play settings, reflecting the unique nature of this provision taking account of MRoP recommendations. These were:

- A proposal for Standard 10: Healthcare – First Aid Open Access Play to change requirements for Paediatric First Aid.
- A proposal for Standard 13 (DC): Suitable person (Day Care) Other Staff Qualifications (DC) to make changes to the required qualifications for other staff for Open Access Play.

### **1.5 Standard 11: Medication, and supporting annex - Guidance for administering liquid paracetamol when children become unwell at the registered setting**

The Welsh Government issued Circular Letter 011/2024 in December 2024 in response to calls from the sector and Care Inspectorate Wales for greater clarity on the administration of non-prescribed paracetamol oral suspension (“liquid paracetamol”). This action was taken urgently to safeguard children’s health and wellbeing when they become unwell while attending registered child minding and day care settings (“registered settings”). Changes were proposed for the Standard 11 Medication with a supporting Annex to provide detailed guidance.

### **1.6 Deployment of staff in day care**

The proposal was to seek views on additional wording to be added to Standard 13 (DC): Suitable person, to offer clarification on deployment of staff across the setting. Information was provided in instances where settings may include additional staff, which are over and above required adult: child ratios, (to support with meeting children’s individual needs).

### **1.7 Child minding assistants**

Coram PACEY Cymru reported that child minders working with assistants are experiencing difficulties recruiting and retaining staff, highlighting a need for greater flexibility. To support continuity in the sector, the proposal is to allow child minding assistants to begin work without a qualification, provided they achieve it within six months and are not left unsupervised until then. This would require changes to Standard 13 (CM) Suitable Person: Child minder. In addition, clearer guidance is required on how long assistants can be left in sole charge of children, with a proposed two hour limit to support safe practice and consistency.

## **1.8 Ratios for child minding**

An Independent Review of Childminding (2023) identified the need for greater flexibility in how child minders apply NMS staffing ratios at key transition points in the day, such as before and after school and during wraparound care. Following detailed consideration with the NMS Advisory Group, proposals were developed to introduce proportionate flexibility while ensuring children's wellbeing remains paramount.

The consultation proposed amendments to Standard 15 (CM: Ratios (Child Minder)).

## **2. Engagement**

Views were invited as part of a 12-week consultation period between 17 September to 10 December 2025. 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.

Childcare and play providers were invited to respond directly to the consultation, with some also participating in online focus groups organised collaboratively by Cwlwm representatives, Play Wales and Welsh Government officials. Participants were specifically selected by their respective organisations. These sessions, led by Welsh Government officials, centred on selected consultation questions pertinent to child minding, day care and open access play providers, with not all consultation questions asked at each focus group. This approach enabled the collection of qualitative data directly from stakeholders. All attendees were also encouraged to complete the formal consultation response form.

Welsh Government would like to thank all who provided their views and attended focus group sessions.

### 3. Summary of responses

In total the consultation received 154 responses. Of these 122 were provided via the online survey and 32 by email. 97 respondents wish to remain anonymous. This consultation received responses from across the childcare and play sector including child minders, day care providers, representatives of third sector organisations, local authorities, Social Care Wales (SCW), Care Inspectorate Wales (CIW), Children in Wales and Estyn.

The number of respondents by type was as follows, (2 did not provide details):

<b>Response</b>	<b>Percentage</b>	<b>Number</b>
Childcare or Play Provider	72.4%	110
Local Authority	13.8%	21
Other	5.3%	8
Representative body	5.3%	8
Parent/ carer	2.6%	4
Member of the public	0.7%	1

98 % of respondents indicated that they lived in Wales, while 87% had a business interest in Wales

Not all respondents answered every question within the consultation and comments were not always provided to questions.

As part of this consultation Welsh Government also held some focus groups events on the National Minimum Standards (NMS) with childcare and play services in partnership with Cwlwm organisations and Play Wales. We asked respondents to indicate within the consultation form whether they had also attended a focus group. A total of 151 responses were received for this question.

<b>Response option</b>	<b>Proportion</b>	<b>Number</b>
Yes, I have also attended a focus group on this consultation	18.5%	28
No, I have not attended a focus group on this consultation	81.5%	123

It is important to note that some respondents selected yes before any focus groups on the NMS had been held. There were other focus groups also being held by Welsh Government officials and partners as part of the consultation relating to Child minding and Day Care Exceptions Order around this time.

The following section provides an overview of the responses and comments submitted in relation to the consultation questions and a summary of the qualitative feedback from the focus groups.

**Question 1: Do you agree or disagree that the layout in the example of Standard 12: Food and Drink provided is clear?**

A total of 139 responses were received to the question.

<b>Response option</b>	<b>Proportion</b>	<b>Number</b>	<b>Number of comments received</b>
Agree	87.8%	122	47
Disagree	1.4%	2	0
Neither agree or disagree	8.6%	12	1
Don't know	2.2%	3	0
No answer selected but comment provided			1

There was broad agreement to the proposal with most respondents (87.8%) agreeing that the layout in the example of Standard 12: Food and Drink provided is clear.

49 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who commented were supportive and stated that the new layout is clear, easy to read, more accessible and straightforward to understand. They appreciate the logical structure, clear headings, and the way requirements are presented, adding the new layout will help settings understand expectations, improve compliance, and make it easier to implement standards in practice (47).
- Some respondents welcomed the inclusion of the child's voice and wellbeing outcomes at the start of each standard. They stated this makes the document more child-centred and aligns with sector values (13).
- A few respondents commented that the document could be overwhelming for some users, particularly new providers (3).

All local authorities, Cwlwm partners, Play Wales, Social Care Wales (SCW) and Care Inspectorate Wales (CIW) agreed with this proposal.

**Welsh Government response**

Given the support to the proposed layout of the standard the Welsh Government intend to develop each standard in this format. We have considered comments provided as part of updating the Integrated Impact Assessment, implementation and future policy work.

## Question 2: Do you agree or disagree that including the related regulations within the standards is helpful?

A total of 139 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	88.5%	123	47
Disagree	1.4%	2	0
Neither agree or disagree	8.6%	12	1
Don't know	1.4%	2	0
No answer selected but comment provided			1

There was broad agreement to the proposal with most respondents (88.5%) agreeing that including the related regulations within the standards is helpful.

49 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who commented were supportive of including related regulations within the standards as it would make expectations clearer, easier to follow, and save time by having all information in one place. Comments noted having regulations alongside standards helps with cross-referencing, ensures consistency, and supports compliance and accessibility (38).
- Some respondents indicated that there should be clear communication when there are updates to the NMS, with suggestions made for change logs (7).

All local authorities, Cwlwm partners, Play Wales, SCW and CIW agreed with this proposal.

### Focus groups summary response

This question was asked in each of the focus groups held.

All participants supported the inclusion of direct links to documentation and regulations within each standard, highlighting that this approach improves usability, clarity, and accessibility. Participants agreed that consolidating resources in one place saves time, reduces stress, and streamlines compliance by eliminating the need to search across multiple sources. This centralisation was noted to be particularly beneficial for new registrants and child minders, aiding understanding and confidence in meeting requirements. Overall, the approach was considered beneficial for raising quality and facilitating implementation of best practices within settings.

## Welsh Government response

Given the support to the proposal the Welsh Government intends to develop each standard in this format. We have considered comments provided as part of updating the Integrated Impact Assessment, implementation and future policy work.

### Question 3: Do you agree or disagree that it's helpful to have links to documentation to support with raising quality within each standard?

A total of 140 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	92.1%	129	47
Disagree	2.1%	3	1
Neither agree or disagree	3.6%	5	1
Don't know	2.1%	3	0
No answer selected but comment provided			1

There was broad agreement to the proposal with most respondents (92.1%) agreeing that it's helpful to have links to documentation to support with raising quality within each standard.

49 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who commented were supportive and stated that having links to supporting documentation is helpful as it makes it easier to implement standards, find information, and improve quality and professional development (48).
- A small number of respondents noted concerns there could be too many links or too much information, which could be overwhelming, especially for new providers (2).

All local authorities, Cwlwm partners, Play Wales, SCW and CIW agreed with this proposal.

## Focus groups summary response

This question was asked in each of the focus groups held.

All participants supported the inclusion of direct links to documentation and guidance within each standard, citing significant improvements in usability, clarity, and ease of access. The introduction of further guidance documents was seen as a means of supporting regulatory compliance. Overall, participants commented that this would raise quality and make maintaining standards more straightforward.

### Welsh Government response

Given the support to the proposal the Welsh Government intend to work with partners to include supporting documents within the NMS. We have considered comments provided as part of updating the Integrated Impact Assessment, implementation and future policy work.

### Question 4: Do you agree or disagree that we should update the ‘What do we mean by High Quality Provision’ chapter of the NMS so that it further aligns with ECPLC principles?

A total of 139 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	84.9%	118	52
Disagree	1.4%	2	1
Neither agree or disagree	10.8%	15	2
Don't know	2.9%	4	0
No answer selected but comment provided			0

There was broad agreement to the proposal with most respondents (84.9%) agreeing we should update the ‘What do we mean by High Quality Provision’ chapter so that it further aligns with Early Childhood Play Learning and Care (ECPLC) principles.

55 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who commented were supportive of the proposal and noted that aligning the NMS with ECPLC principles will help ensure consistency, clarity, and a shared understanding of high-quality provision across the sector (52).
- Some respondents, including a representative body, asked for clarity on how it will align with local authority quality assurance tools and access to training,

and if practical examples of what high quality provision looks like in different settings could be included (11).

Most local authorities, Cwlwm partners, Play Wales, SCW and CIW agreed with this proposal.

### **Focus groups summary response**

This question was asked in each of the focus groups held.

All participants supported updating the 'What do we mean by High Quality Provision' chapter of the NMS to more closely align with ECPLC principles. Participants viewed the alignment would provide clearer guidelines, making it easier to explain practice changes during inspections. Participants emphasised the importance of raising parental awareness about their expertise which would both support understanding and enhance the profession's reputation.

### **Welsh Government response**

Given the support for the proposal, Welsh Government intend to update the 'What do we mean by High Quality Provision' chapter to further align with ECPLC principles. We have considered feedback provided as part of updating the Integrated Impact Assessment, and work with partners in implementing the proposal.

### **Question 5: Do you agree or disagree with the update to the definition on Open Access Play?**

A total of 127 responses were received to the question.

<b>Response option</b>	<b>Proportion</b>	<b>Number</b>	<b>Number of comments received</b>
Agree	61.4%	78	51
Disagree	4.7%	6	4
Neither agree or disagree	26.8%	34	11
Don't know	7.1%	9	1
No answer selected but comment provided			4

There was broad agreement to the proposal with most respondents (61.4%) agreeing with the update to the definition on Open Access Play.

71 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who provided comments were supportive of the revised definition noting it is clearer, more comprehensive, and better reflects the context of open access playwork, having a practical, accessible, and inclusive approach. It was highlighted that the definition was collaboratively developed with Play Wales and the Playwork Education and Training Council for Wales (PETC) and aligned with the statutory guidance 'Wales – a Play Friendly Country' (32).
- A small number of respondents raised concerns about the appropriateness of allowing young children (e.g., as young as 5) to leave unescorted, and the need for age limits and safety measures (8).

Most local authorities, all Cwlwm partners, Play Wales, SCW and CIW agreed with this proposal.

### Welsh Government response

Given the support for the proposal and that the definition was developed in partnership with Play Wales, and Playwork Education and Training Council for Wales (PETC) Wales, reflecting the Wales – a Play friendly country' statutory guidance for local authorities, the Welsh Government intend to implement the updated definition. We have considered comments provided as part of updating the Integrated Impact Assessment. We will consider with partners comments relating to when children aged 5 years old attend open access play, and as part of implementation and future policy work.

**Question 6. We propose that a more proportionate approach to First Aid Training- Open Access Play (Standard 10) would be to require at least one person to be on the premises at all times with a full first aid qualification, with contingencies in place for additional staff to hold first aid qualifications, subject to a risk assessment of the types of activities undertaken. Do you agree or disagree with this proposal?**

A total of 131 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	78.6%	103	38
Disagree	6.9%	9	9
Neither agree or disagree	12.2%	16	8
Don't know	2.3%	3	0
No answer selected but comment provided			0

There was broad agreement to the proposal with most respondents (78.6%) agreeing to the proportionate approach to First Aid Training for Open Access Play.

55 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who commented were supportive and agreed that at least one person with a full first aid qualification should always be present, considering it a reasonable minimum, supported by a risk assessment approach with contingencies in place. Respondents noted that a proportionate approach is necessary for the sustainability of open access play settings, especially for seasonal provision (38).
- Some respondents commented that a minimum of two or all staff, not just one, should be first aid trained to ensure safety and adequate cover in emergencies, adding that in best practice or in risky activities there should be more than one, and that clear contingencies must be in place (11).

Most of the local authorities, most Cwlwm partners, Play Wales, SCW and CIW agreed with this proposal.

### **Focus groups summary response**

This question was asked in the Play Wales focus group.

Most participants supported a more flexible approach to First Aid requirements in Open Access Play, highlighting the importance of matching safety measures with real-life situations, prioritising children's safety, and allowing operational flexibility. The proposed adjustments were seen as positive, likely to improve both quality and practicality.

### **Welsh Government response**

Given the support for the proposal and recommendations from the MROP Report for a proportionate approach, the Welsh Government intend to implement the proposed change to the first aid requirements for Open Access Play services. We note the comments provided on the need for a risk assessment approach to ensure the safety of children. The Welsh Government has considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

**Question 7: Do you agree or disagree with the changes proposed for a proportionate approach to Standard 13: Suitable person Other Staff (Qualifications) for Open Access Play?**

A total of 126 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	67.5%	85	29
Disagree	4.0%	5	3
Neither agree or disagree	21.4%	27	6
Don't know	7.1%	9	3
No answer selected but comment provided			1

There was broad agreement to the proposal with most respondents (67.5%) agreeing with proposed changes, for a proportionate approach to Standard 13: Suitable person Other Staff (Qualifications) for Open Access Play.

42 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who provided feedback were supportive of the proposed change, stating that it would make qualification requirements more proportionate for open access play settings, which could help address recruitment challenges and enhance sector sustainability. Several respondents also mentioned that the changes might enable more open access play settings to register or remain viable (27).
- Some respondents expressed concern that changing the qualification requirements could negatively impact quality, safety, or the perceived value of playwork qualifications (6).

Most of the local authorities, all Cwlwm partners (who responded), SCW, CIW and Play Wales agreed with this proposal.

**Focus groups summary response**

This question was asked in the Play Wales focus group.

All participants welcomed the proposed changes to Standard 13, seeing them as a positive step to address recruitment and operational difficulties in Open Access Play. There was a call for clearer guidance on staff supervision and induction training, with suggestions to make induction programmes specific to each role and setting. The importance of recognising staff who are working towards meeting these standards

was highlighted, as this could support the development and retention of a skilled workforce, especially given ongoing recruitment and retention challenges.

### Welsh Government response

Given the support for the proposal and recommendations from the MRoP Report for a proportionate approach to Open Access Play standards, the Welsh Government intend to implement the proposed change to the percentage of level 2 (or above) qualified ‘other staff’ for Open Access Play services. We have considered feedback provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

### Question 8: Do you agree or disagree with the changes made to Standard 11 Medication to show the distinction between prescribed and non-prescribed medication?

A total of 140 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	87.1%	122	47
Disagree	3.6%	5	4
Neither agree or disagree	5.7%	8	3
Don't know	3.6%	5	1
No answer selected but comment provided			0

There was broad agreement to the proposal with most respondents (87.1%) agreeing with the changes to Standard 11: Medication, to show the distinction between prescribed and non-prescribed medication.

55 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who provided feedback were supportive and noted a clearer distinction between prescribed and non-prescribed medication, stating it helps providers, parents, and staff understand procedures and responsibilities. They commented that the changes improve safety for children and protect staff by reducing ambiguity and ensuring proper procedures (37).
- Some respondents requested more clarity on specific issues, such as whether Calpol can be given for teething, the use of sachets versus bottles, the process for obtaining consent and the challenges of ensuring clear communication with parents about medication administration (18).

- A small number of respondents raised issues about the practicality and necessity of storing all medicines in a locked container, especially for emergency medication or when refrigeration is required (10). Coram Pacey Cymru requested consideration to be given to the wording used within the standard, with a suggested alternative to 'locked container' as "all medicines are stored securely with the manufacturer's instructions and inaccessible to children".
- A concern was noted by some that the changes may not fully address the needs of disabled children or children with complex medical needs (7).
- A small number of respondents commented on the practicalities of implementing the new standard, such as the cost of sachets and the need for templates or guidance for record keeping (6).

Most local authorities, all Cwlwm partners (except Coram Pacey Cymru for reasons noted above) SCW, CIW and Play Wales agree with this proposal.

### Welsh Government response

Given the support for the proposal the Welsh Government intend to implement the proposed updates to Standard 11, and the introduction of an additional annexe. We have considered comments made as part of the consultation and will collaborate with health officials to explore a practical risk-based approach for the storage of liquid paracetamol. The Welsh Government has considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

### Question 9: Do you agree or disagree with adding the following to Standard 13 (DC): Suitable person (Day Care)?

**New standard: Percentages for qualified and unqualified staff must be met across the setting as a whole, rather than on a room-by-room basis. Careful consideration must be given to the deployment of staff throughout the setting and within each room to ensure the safety, welfare and development needs of children are met at all times, including those with additional needs and disabilities.**

A total of 130 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	66.9%	87	28
Disagree	6.2%	8	6
Neither agree or disagree	19.2%	25	10
Don't know	7.7%	10	1

No answer selected but comment provided			2
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There was broad agreement to the proposal with most respondents (66.9%) agreeing with the proposed new standard under Standard 13.

47 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who commented were supportive and stated the proposal offers clearer guidance and greater flexibility for staff deployment, particularly during absences, lunch breaks, or in small and rural locations. They mentioned that it helps managers temporarily cover gaps when qualified staff need to move between rooms, making it especially useful for small teams. Respondents also highlighted the ongoing staffing and recruitment crisis in the sector, viewing the proposed standard as necessary for helping settings remain viable (20).
- Some respondents noted concerns the change could lead to rooms being left with only unqualified staff, potentially compromising the quality of care, supervision, and child safety (16).
- A small number of respondents asked for clear, unambiguous guidance to ensure consistent interpretation and implementation by both providers and inspectors (7).
- Some respondents noted the importance of ensuring disabled children and children with additional needs are not disadvantaged by the change (6).

Most local authorities, most Cwlwm partners (who responded), SCW and CIW agree with this proposal.

### **Focus groups summary response**

This question was asked in focus groups with Clybiau Plant Cymru Kids Clubs (CPCKC); Early Years Wales; Mudiad Meithrin and National Day Nurseries Association (NDNA) Cymru.

Most participants supported the proposal to amend Standard 13 (DC) to clarify qualified and unqualified staff ratios to be met across the whole setting rather than room-by-room. They viewed this would bring greater clarity and flexibility, particularly in managing staff absences and deploying personnel to meet children's needs. However, some participants raised concerns about the term 'careful consideration' in staff deployment and questioned how people would interpret and apply the standard across diverse childcare settings, especially those with open-plan or mixed-use layouts. There was also a call for more managerial discretion, recognising that formal qualifications do not always equate to competence. Flexibility in staffing was viewed as particularly beneficial in adapting to changing requirements and responding to the increasing complexity of children's needs within the sector.

## Welsh Government response

Given the support for the proposal the Welsh Government intend to implement the additional standard to clarify the percentages of staff are across the setting and that careful consideration is required by the provider on how staff are deployed to meet children's needs. The Welsh Government has considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

### Question 10: Do you agree or disagree with adding the following to Standard 13 (DC): Suitable person (Day Care)?

**New Standard: Dependent upon each setting's individual staffing levels, it may be necessary to deploy more staff where specific support is identified to meet children's individual needs. Minimum adult: child ratios must still be met. Any member of staff who is employed to work with specific children to provide extra support may not be counted within the standard staffing ratios.**

A total of 127 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	72.4%	92	30
Disagree	0.8%	1	1
Neither agree or disagree	18.1%	23	6
Don't know	8.7%	11	0
No answer selected but comment provided			1

There was broad agreement to the proposal with most respondents (72.4%) being in agreement with the additional standard into Standard 13.

38 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents were supportive and stated that staff members employed specifically to support individual children should not be included within standard staffing ratios. This approach ensures that children with additional needs receive appropriate assistance without compromising the overall quality of care for other children. Respondents also remarked that the proposal permits managers greater flexibility in allocating staff according to the specific requirements of both the setting and its children (19).

- Some respondents highlighted practical challenges within the sector, such as difficulties in recruiting and funding additional staff, especially for one-to-one support. This included concerns about sustainability, particularly in the context of staff shortages and financial constraints (11).
- Some respondents, including NDNA Cymru, requested clearer guidance on how the standard could be applied in practice, with examples and clarification on how to evidence appropriate staff deployment (8).
- Some respondents noted the importance of inclusion and supporting equitable access to care for disabled children and children with additional learning needs (ALN) (6).

Most local authorities, all Cwlwm partners (who responded), SCW and CIW agree with this proposal.

### **Focus groups summary response**

This question was asked in focus groups with Clybiau Plant Cymru Kids Clubs (CPCKC); Early Years Wales; Mudiad Meithrin and National Day Nurseries Association (NDNA) Cymru.

Some participants highlighted that the proposed wording for the new staffing standard in Day Care settings is unclear and may lead to confusion about whether one-to-one support staff can be included in standard staffing ratios. There was consensus that clearer guidance is needed, particularly regarding staff employed to support individual children, as well as the use of terms like “may”, “should”, or “must”, to ensure consistency in interpretation. Concerns were raised by some about practical challenges in recruiting suitable support staff, differences in practices across local authorities, and the potential for inconsistent application. Some participants agreed that improved clarity would benefit practitioners and support compliance with regulations. The groups recognised the need for the additional standard and clarity on staff qualifications and deployment.

### **Welsh Government response**

Given the support for the proposal the Welsh Government intend to implement the additional standard to clarify that where it is necessary for settings to deploy extra staff to meet children’s individual needs; that this additional staffing support, does not impact on core adult child staffing ratios. We have considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the additional standard.

**Question 11: Do you agree or disagree that child minding assistants could be employed if working towards the assistant qualification, but not be left unsupervised with children during this time, and must complete the qualification within 6 months?**

A total of 135 responses were received to the question.

<b>Response option</b>	<b>Proportion</b>	<b>Number</b>	<b>Number of comments received</b>
Agree	78.5%	106	38
Disagree	7.4%	10	7
Neither agree or disagree	11.1%	15	6
Don't know	3.0%	4	0
No answer selected but comment provided			3

There was broad agreement to the proposal with most respondents (78.5%) agreeing that child minding assistants could be employed if working towards the assistant qualification but not be left unsupervised with children during this time and must complete the qualification within 6 months.

54 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents commented on the need for appropriate checks, essential training (first aid/safeguarding), and a clear timeframe to be adhered to (28).
- Some respondents were supportive of the 6 months' period to complete the qualification (15) while a few raised concerns that the period may be too short (4).
- Some respondents were in agreement that child minding assistants must not be left unsupervised until qualified, with comments added that supervision should be risk assessed (14).
- Some respondents commented that experience can be as meaningful as formal qualifications, especially when combined with robust safeguarding and first aid training (8).
- A small number of respondents noted that flexibility is valued for enabling child minders to meet demand, cover sudden staffing gaps and improve sustainability (6).

Most local authorities, SCW, CIW and all Cwlwm partners (who responded) agree with this proposal.

## Focus groups summary response

This question was discussed in the focus group with Coram Pacey Cymru.

All participants agreed that child minding assistants should be actively working towards a recognised qualification and must not be left unsupervised with children until they are fully qualified. There was unanimous support for ongoing supervision of assistants-in-training, emphasising children's safety and the quality of care. The group discussed various qualification routes, such as NVQ 3 and the child minding assistant qualification, noting that some pathways could exceed the proposed six-month completion period and might be hindered by funding issues or overlapping courses. Positive feedback was shared regarding skill development under supervision, viewing the experience as valuable preparation for future registration and for building a more skilled workforce. Financial challenges were highlighted, particularly around self-funding for certain qualifications, with level 3 childcare qualifications being more accessible at no cost. Overall, there was a consensus that changes should prioritise children's welfare, ensuring staff are well-trained, qualified, and supervised.

## Welsh Government response

Given the support for the proposal the Welsh Government intend to implement the change that child minder assistants can start work whilst completing a child minder assistant qualification, providing they are not in sole charge of children until qualified; and complete the child minding assistant qualification within 6 months alongside meeting all other requirements as set out in annex A. We have considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

**Question 12: Do you agree or disagree that child minding assistants could be left in sole charge of children, in line with the adult to child staffing ratios, for up to two hours a day in total if all the requirements of the guidance within Annex A and Standard 13 are complied with?**

A total of 135 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	74.5%	102	35
Disagree	12.4%	17	9
Neither agree or disagree	7.3%	10	5
Don't know	5.8%	8	3
No answer selected but comment provided			2

There was broad agreement to the proposal with most respondents (74.5%) agreeing that child minding assistants could be left in sole charge of children, in line with the adult to child staffing ratios, for up to two hours a day in total if all the requirements of the guidance within Annex A and Standard 13 are complied with.

54 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents who commented were supportive and noted that this proposal is essential to managing school related travel without disrupting younger children agreeing that assistants must be qualified, have all the relevant mandatory training prior to being left in sole charge (32).
- A small number of respondents, and Coram Pacey Cymru despite being supportive of the proposal overall noted concern regarding the 2 hour timeframe and proposed that it should be increased to 3 hours noting this would be required to support and not disadvantage child minding services in rural areas (4).

Most local authorities, SCW, CIW and Cwlwm partners (who responded to this question) agree with this proposal.

### **Focus groups summary response**

This question was discussed in the focus group with Coram Pacey Cymru.

Some participants highlighted that the proposed two-hour limit for leaving child minding assistants in sole charge presents practical difficulties, particularly in rural areas where travel times are longer and meetings may run over. There was a discussion about whether the limit should be based on distance or the ability to return within a certain timeframe, rather than a fixed period, to allow greater flexibility for rural settings and unplanned delays. Additionally, strict time limits could disproportionately affect rural and Welsh-speaking communities, where child minding options are limited. Some feedback, including from Coram Pacey Cymru, suggested reconsidering the two-hour rule and proposed a three-hour limit to better reflect the realities faced by child minders in these contexts.

### **Welsh Government response**

Given the support for the proposal and recommendations made from the Independent Review of Childminding, the Welsh Government intend to implement the change of clarifying a set time limit that qualified child minding assistants could be left in sole charge of children. We have considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

**Question 13: Do you agree or disagree with the following:  
The maximum number of children for whom a child minder can care for is as follows:  
Ten children up to 12 years of age;  
Of those ten children, no more than six may be under 8 years of age.  
Of those six, no more than four may be under 5 years of age.  
Of those four no more than three may be under 2 years of age  
Of those three children, normally no more than two may be under 18 months of age, although exceptions can be made for siblings.'**

A total of 149 responses were received to the question.

<b>Response option</b>	<b>Proportion</b>	<b>Number</b>	<b>Number of comments received</b>
Agree	79.2%	118	63
Disagree	12.1%	18	14
Neither agree or disagree	7.4%	11	5
Don't know	1.3%	2	1
No answer selected but comment provided			2

There was broad agreement to the proposal with most respondents (79.2%) agreeing with ratios for child minders proposed in this question.

85 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents were supportive and commented that it would offer increased flexibility by facilitating the management of drop-off and pick-up times, supporting parents with variable work schedules, enabling the provision of ad hoc or emergency childcare, offering continuity of care to families and support with the sustainability of the sector (53).
- Some respondents commented that consideration is needed of the impact on the care and safety with the wide age range of children, children's differing needs, highlighting that a lower number would be safer, with risk assessments and careful monitoring being required (10).

Most local authorities, SCW and CIW expressed support for this proposal. While not all Cwlwm partners provided feedback, one was in agreement and two disagreed noting concerns of perceived lack of parity with other sector areas.

## Focus groups summary response

This question was discussed in the focus group with Coram Pacey Cymru.

Participants unanimously supported the proposed changes to child minder ratios, highlighting increased flexibility for families and improved continuity of care, particularly for siblings. The consensus was that professional judgement should guide the management of numbers rather than strict daily limits. The new proposals were welcomed for supporting stable relationships with siblings and boosting morale among child minders. The ability to care for more children was seen as a way to ensure financial viability and enhancing parental choice. Some participants also stressed the importance of maintaining safeguards and quality assurance to protect children's welfare.

## Welsh Government response

Given the support for the proposal and recommendations from the Independent Review of Childminding, the Welsh Government intend to implement the change of ratios for child minders. We have considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

**Question 14: Do you agree or disagree that children who are due to start full-time statutory schooling (reception year) in the September could be classed as over 5 years old in the summer holidays immediately before this for the purposes of the ratios relevant to child minders?**

A total of 149 responses were received to the question.

Response option	Proportion	Number	Number of comments received
Agree	77.9%	116	44
Disagree	14.8%	22	16
Neither agree or disagree	5.4%	8	4
Don't know	2.0%	3	2
No answer selected but comment provided			2

There was broad agreement to the proposal with most respondents (77.9%) agreeing that children who are due to start full-time statutory schooling (reception year) in the September could be classed as over 5 years old in the summer holidays immediately before this for the purposes of the ratios relevant to child minders.

68 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents were supportive and commented the proposal would give child minders more flexibility and support with financial sustainability. They believe it will help maintain continuity of care for families, allow siblings to stay with the same child minder, and make settling in new starters over the summer period smoother. Many noted children are often independent by the summer before starting school and see the proposed change as minor (44).
- Some respondents raised concerns about the developmental gap between children aged 4 and 5 years old and that this raises safety concerns, noting that some 4-year-olds require close supervision (17).
- A small number of respondents commented on the lack of fairness and parity with other childcare providers, stating rules should be consistent across all regulated childcare (8).
- A small number of respondents called for clearer definitions and guidance on the definition of statutory school age, and whether this proposal would apply to inset days (7).

Some local authorities, SCW, CIW and most Cwlwm partners (who responded to this question) agree with this proposal.

### **Focus groups summary response**

This question was discussed in the focus group with Coram Pacey Cymru.

All participants strongly supported reclassifying children who are due to start reception year as over 5 years old during the summer holidays immediately prior to their start, viewing this as a practical solution to improve sibling care and continuity for families. The change is considered to offer child minders greater flexibility for managing transitions, facilitating settling-in sessions, and maintaining financial stability. There was consensus on the need for clearer guidance regarding definitions of 'full-time statutory schooling', the timing of summer holidays, and the handling of inset days. Most agreed that professional judgement and risk assessments should guide ratio management, while inspection and accountability remain vital for safeguarding children.

### **Welsh Government response**

Given the support for the proposal Welsh Government intend to implement the proposed change to provide flexibility in ratios for child minders during the summer holiday period prior to when a child starts reception year of school in September. Some local authorities and Cwlwm partners made suggestions for amendments to the proposal and noted possible unintended consequences affecting children's safety. We have considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

**Question 15: Do you agree or disagree that children aged 3-5 years old who attend an educational provision or a combination of an educational provision and wrap-around childcare within school hours at another setting for five or more hours per day could be classed as over 5 years old for the purposes of the ratios relevant to child minders?**

A total of 146 responses were received to this question.

Response option	Proportion	Number	Number of comments received
Agree	73.3%	107	33
Disagree	15.8%	23	17
Neither agree or disagree	8.9%	13	5
Don't know	2.1%	3	3
No answer selected but comment provided			2

There was broad agreement to the proposal with most respondents (73.3%) agreeing that children aged 3-5 years old who attend an educational provision or a combination of an educational provision and wrap-around childcare within school hours at another setting for five or more hours per day could be classed as over 5 years old for the purposes of the ratios relevant to child minders.

60 respondents provided comments to this question. Key findings from comments are summarised below alongside the number of respondents who mentioned each theme:

- Most respondents were supportive and commented the proposal would give child minders and parents more flexibility and simplify wraparound care ensuring continuity for families. Respondents noted the proposal could help sustain child-minding businesses, as current ratios restrict income and threaten sustainability (33).
- Whilst 107 respondents agreed to the proposal, around half of respondents who commented raised concerns that children aged 3 to 5 years of age are very different developmentally from children over 5 years, with some adding that reclassifying by school attendance (not age) may reduce safety, overstretch supervision, or increase the risk of unmet emotional or developmental needs (13).
- A small number of respondents stated that decisions should be based on each child's individual developmental stage, family context, and the child minder's professional judgement, not solely on school attendance (7).
- Comments on parity between child minders and full day care settings, noting that rules should be aligned were raised by a small number of respondents. With concern child minders may be unfairly advantaged or disadvantaged if the ratio rules differ from nurseries or Flying Start requirements (6).

Some local authorities, some Cwlwm partners (who responded to this question), SCW and CIW agree with this proposal.

### **Focus groups summary response**

This question was discussed in the focus group with Coram Pacey Cymru.

Some participants expressed confusion about the definition of “educational provision” and how hours should be calculated under the proposed rule change, highlighting a need for clearer guidance and practical examples to aid understanding. While most agreed the change would offer greater flexibility for parents with demanding schedules and help child minders support families, concerns were raised about the impact of children attending multiple settings and the potential for child minders to be seen merely as babysitters. Some participants worried that increased flexibility might create loopholes, possibly undermining the professional role of child minders. Additionally, there were calls for clarity on whether ratios would remain consistent during school holidays to avoid impractical changes. Across all views, participants emphasised that the welfare and best interests of children must be prioritised.

### **Welsh Government response**

Given the support for the proposal Welsh Government intend to implement the proposed change to provide flexibility in ratios for child minders. Some respondents including local authorities and Cwlwm partners made suggestions for amendments to the proposal and noted possible unintended consequences affecting children's safety. We have considered comments provided as part of updating the Integrated Impact Assessment and will work with partners in implementing the change.

#### **4. Responses from Engagement Questions**

The following section gives a summary of responses and comments that were received in relation to the engagement questions. Engagement questions were asked to help inform future policy development work.

##### **Engagement A: What further changes would you like to see within the National Minimum Standards statutory guidance to support the Early Childhood Play, Learning and Care (ECPLC) vision**

54 comments were received in response to this question.

Responses to this question highlighted a wide range of views on how the National Minimum Standards (NMS) could better support the Early Childhood, Play, Learning and Care (ECPLC) vision. While some respondents viewed the current proposals were sufficient, others identified areas where further clarification, alignment or practical support would enhance implementation.

Key findings from comments are summarised below alongside the number of respondents who raised them:

- ECPLC vision being reflected in the NMS is valued, but some practical examples, case studies, and clearer links to planning and everyday practice would be beneficial (10).
- Clear alignment between the NMS and wider policy, including ECPLC, Curriculum for Wales, Developmental Pathways for children aged 0–3, playwork principles, and existing quality assurance schemes is viewed as important. Aligning language, structure and expectations across these would strengthen coherence and sector understanding (12).
- The need for consistent interpretation and application of the NMS across providers, local authorities and inspectors (4).
- The importance of access to training and workforce support and inclusion of professional development to support staff confidence and capability (5).
- The NMS needs to better reflect the needs of children with additional learning needs or diverse developmental needs, and high-quality provision must be responsive and inclusive (3).
- The high quality chapter should place greater emphasis on children’s rights, including stronger alignment with the UNCRC and a clearer focus on child-centred practice (3).

##### **Welsh Government response**

The Welsh Government has reviewed comments made to determine if additional adjustments to the proposed changes are necessary during this NMS update, and to help inform ongoing policy development.

## **Engagement B: Do you have any other comments with regards to the chapter ‘What do we mean by High Quality Provision’?**

47 comments were received in response to this question.

Responses to this question demonstrate broad support for the chapter on High-Quality Provision, with most respondents welcoming its clarity and emphasis on core principles. Some suggested opportunities to refine the chapter, to enhance its alignment with wider guidance, and support more consistent implementation across Wales.

Key findings from comments are summarised below alongside the number of respondents who raised them:

- The chapter is clear, comprehensive and reflective of existing sector expectations and it effectively captures what high-quality provision should look like (12).
- The chapter would benefit from explicit references to wider statutory and practice frameworks (11). These include links to the Curriculum for Wales, Flying Start guidance, Healthy and Sustainable Pre-school Scheme, the Anti Racist Wales Action Plan, UNCRC, playwork principles, and other sector-specific quality tools.
- Some respondents viewed the document should use consistent terminology, highlight continuous improvement (while acknowledging practical limitations), and reflect the importance of both playwork and childcare, ensuring that standards and support are equitable and up to date for all types of settings (10).
- Some respondents viewed the chapter could be strengthened by including simple, practical examples of high-quality practice, particularly to support new or less experienced staff (3).
- Some respondents viewed the chapter should be treated as a living document, updated regularly to reflect evolving practice and sector developments (3).
- Some respondents raised concern that the chapter might be interpreted in a way that creates undue burden on providers or reduces flexibility in how high-quality provision is achieved (3).

### **Welsh Government response**

The Welsh Government has reviewed comments made in response to this question to determine if additional adjustments to the proposed changes are necessary during this NMS update, and to help inform ongoing policy development.

**Engagement Question C: Do you think adding examples of types of provision within the definitions of each of the sub categories of day care would be helpful?**

Response option	Proportion	Number
Yes	98.4%	120
No	1.6%	2

**Welsh Government response**

Given the response to this question, the Welsh Government intend to add examples of different types of provision to each day care sub category definition.

**Engagement Question D – Do you think the NMS Annex- Guidance for administering liquid paracetamol when children become unwell at the setting, helps to explain what the setting can and cannot do in relation to administering liquid paracetamol in the situations described?**

Response option	Proportion	Number
Yes	94.8%	128
No	5.2%	7

55 comments were received to this question.

Responses indicated broad support for the inclusion of clearer guidance, while also highlighting areas where additional clarity or flexibility may be needed. The following section summarises the themes raised, alongside the number of respondents who referenced each theme:

- The Annex provides clear, helpful and accessible guidance, it strengthens safe practice, removes previous ambiguity, and offers confidence to both new and experienced practitioners (35).
- The Annex is helpful, additional clarification is required in key areas (18). These include:
  - distinguishing between when paracetamol can be administered for illness vs discomfort (e.g., teething)
  - clarifying whether sachets are mandatory or whether bottles remain acceptable
  - defining expectations for consent (verbal vs written)
  - refining wording to avoid misunderstanding
- Some respondents viewed that parents may incorrectly assume that paracetamol can be administered routinely, or that children may remain in the setting after receiving it. A need for very clear messaging about when children

must be collected and the limited circumstances under which paracetamol may be given (7).

- Some respondents raised concerns about the use of sachets over bottles, and when bottles could be permitted, when used appropriately (6). Concerns include:
  - cost implications
  - practical difficulties for younger children who require half doses
  - unnecessary waste
  - challenges in sourcing sachets
- Some noted the Annex must be fully consistent with NHS or PHW guidance, especially regarding temperature thresholds, teething pain, and post-vaccination symptoms (4).
- Some noted that when working with children with significant medical needs paracetamol may be a necessary part of individual healthcare plans, and viewed the Annex needs to consider instances where specialist care is provided (3).
- Some called for clearer guidance on when to contact parents, when to consult NHS 111, and how to manage delays or unresponsive families (4).

## Welsh Government response

The Welsh Government has reviewed the comments provided in response to this question with partners to determine if additional adjustments to the proposed changes are necessary during this NMS update, and to help inform ongoing policy development.

**Engagement Question E: What, in your opinion, would be the likely effects of the proposed changes to the NMS 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. Do you think that there are opportunities to promote any positive effects?**

Response option	Proportion	Number
Yes	76.7%	92
No	23.3%	28

52 comments were received to this question.

Responses recognised a consistently strong commitment to promoting the Welsh language within childcare and play settings, alongside concerns around workforce capacity, training access.

The following section summarises the key themes raised, alongside the number of respondents who referenced each theme:

- Support for the promotion of Welsh language and culture within settings (18). Comments noted the value of bilingualism, the importance of embedding Welsh in everyday practice, and welcomed opportunities to reinforce children’s exposure to the language. Some respondents noted pride in using Welsh and viewed the proposed changes would further enable or enhance provision.
- The need for improved access to training and resources (10). Some comments requested more opportunities to learn Welsh, to access bilingual materials, have clearer signposting to support, and practical tools to facilitate consistent language use.
- Concerns about the shortage of Welsh-speaking staff (6). Some respondents raised recruitment difficulties limiting settings’ ability to fully implement Welsh-language expectations, especially in areas where demand from families is low. Respondents viewed that the proposals would require appropriate support as to not impact on existing workforce challenges.
- Some respondents noted that the proposed changes would have no negative impact on their provision, or that they were already delivering strong Welsh-language practice (7).
- Some comments noted the need for clear, consistent expectations relating to Welsh language provision (8). This included calls for better explanation of requirements, clearer integration of Welsh across the NMS, and additional examples to help settings understand expectations in practice.
- Some commented that increasing opportunities for incidental Welsh, bilingual resources, and everyday language exposure would be beneficial (5). With respondents adding that embedding Welsh naturally into the daily environment may be more practical and impactful than formal language instruction.

### Welsh Government response

The Welsh Government has considered comments received as part of ongoing policy development work and as part of updating the Integrated Impact Assessment.

### Do you think that there are opportunities to mitigate any adverse effects?

Response option	Proportion	Number
Yes	59.4%	57
No	40.6%	39

36 comments were received to this question.

Overall, respondents did not identify adverse effects arising from the proposed changes. Most comments focused on the need for clarity, practical implementation considerations, and opportunities to strengthen or streamline when updating the NMS.

The following section summarises the themes raised, alongside the number of respondents who referenced each theme.

- The proposed changes are not expected to result in any negative impacts. Some commented the proposals aligned with existing practice, or that no detrimental consequences were foreseeable (11).
- The proposed changes could encourage greater use of the Welsh language within settings, support the Active Offer, and promote a more bilingual environment (6).
- Some commented on the need for ongoing training, time for workforce development, and embedding a supportive, “can-do” culture to ensure effective implementation of any changes (4).

### Welsh Government response

The Welsh Government has considered the comments to this question to help inform ongoing policy development and as part of updating the Integrated Impact Assessment.

**Engagement Question F: In your opinion, could the proposed changes to the NMS 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**

Response option	Proportion	Number
Yes	73.5%	72
No	26.5%	26

30 comments were received to this question.

Analysis of responses indicate a range of views on the potential impact of the proposed changes on the Welsh language.

The following section summarises the themes raised, alongside the number of respondents who referenced each theme.

- The proposed changes offer opportunities to enhance the promotion and visibility of the Welsh language within childcare and play settings (16). Such

measures could help raise the profile of the Welsh language and ensure equal access for children and parents in both Welsh and English. Comments noted the value of:

- Providing bilingual resources, practical examples, and staff training to support the everyday use of Welsh.
  - Encouraging use of simple Welsh phrases, songs, signage, and greetings to normalise the language in settings.
  - Supporting staff through accessible Welsh-language learning opportunities.
  - Aligning the National Minimum Standards more explicitly with Cymraeg 2050 and promoting bilingual practice.
  - Offering clearer guidance, including case studies, on how Welsh can be embedded proportionately across different types of provision.
- Some raised practical challenges which could influence Welsh language outcomes (5). These included: difficulty in recruiting Welsh-speaking staff, particularly in rural areas; Limited access to Welsh-medium wraparound or out-of-school care; Risk that some proposals (e.g., ratio flexibility or rising-5 definitions) could inadvertently reduce access to Welsh-medium provision if not carefully implemented. Some comments raised the need to ensure that changes do not unintentionally disadvantage Welsh-medium choices for families.

### **Welsh Government response**

The Welsh Government has considered comments made as part of updating the Integrated Impact Assessment.

**Engagement Question G: We have asked a number of specific questions on Welsh Language. If you have any related issues which we have not specifically addressed, please use this space to report them.**

30 comments were received to this question.

Analysis of the comments demonstrate a range of views relating to the Welsh language, workforce capacity, and the support required to embed Welsh-medium and bilingual practice effectively. The following section summarises the key themes raised, alongside the number of respondents who referenced each theme.

- The need for improved support to help settings strengthen their Welsh language provision (8). This included requests for additional training opportunities, free or accessible Welsh language lessons, increased peripatetic Welsh language support, and clearer guidance on expectations for providers. Some respondents raised the importance of supporting both Welsh-medium and bilingual approaches in a practical and achievable way.
- Ongoing challenges relating to staffing, particularly around the recruitment of Welsh-speaking staff (4). Concerns were raised that increased

language-related expectations may intensify existing recruitment pressures unless accompanied by appropriate support.

- Request for clearer, more accessible guidance to support implementation of Welsh language expectations (7). This included calls for an expanded explanation of the Welsh Active Offer. Respondents raised the importance of ensuring that settings are not penalised where barriers exist beyond their control.
- Some respondents noted the proposed changes would have no particular impact on their Welsh language provision (5).

## **Welsh Government response**

The Welsh Government has considered the comments to determine if additional adjustments to the proposed changes within the consultation are necessary during this NMS update, as well as to guide ongoing policy development and updating the Integrated Impact Assessment.

## **Engagement Question H: Do you have any comments on the current “working towards” requirements?**

61 comments were received to this question.

Respondents raised a range of views relating to staffing, qualifications, sustainability, and the operation of childcare settings. The following section summarises the key themes raised, alongside the number of respondents who referenced each theme.

- Support for the continuation or expansion of the “working towards” approach (26). Some respondents noted this supported workforce entry, helped manage staff shortages, and sustainability.
- Some respondents noted recruitment and retention difficulties with ongoing struggle to recruit qualified staff and the risk that increased requirements could worsen staff shortages (13). Some highlighted the current workforce pressures were already impacting service stability.
- Some respondents welcomed greater flexibility in staffing arrangements, seeing this as essential for some settings such as small or rural settings (6). They noted that flexibility would help maintain continuity of care and adapt to fluctuating demand.

Overall, responses indicate support for maintaining or expanding flexible qualification pathways, particularly in light of recruitment and retention challenges. While some respondents viewed that the proposed changes would help settings remain sustainable, others emphasised the need for clear guidance and safeguards to ensure quality, particularly for children with additional needs.

## Welsh Government response

The Welsh Government has considered comments as part of ongoing policy development work.

### **Engagement Question I: What comments, if any, do you have on the draft impact assessments, particularly impacts on children, families and those living in socio-economic disadvantage (including evidence you feel should be considered)?**

35 comments were received to this question.

Feedback on the draft impact assessments reflected a wide range of perspectives, with respondents highlighting several areas requiring attention to ensure that the revised NMS support children, families, and the childcare sector effectively. Overall, respondents recognised the impact assessments capture many of the key issues facing the sector. However, some respondents viewed that achieving positive outcomes will depend on coherent national alignment, adequate funding, sustainable workforce structures, and practical support to ensure the proposed changes can be implemented effectively and equitably.

The following section summarises the themes raised, alongside the number of respondents who referenced each theme.

- Ongoing challenges related to funding, affordability, and sustainability with some respondents noting that childcare providers continue to face significant financial pressures, particularly where additional support is needed for disabled children and children with ALN (12). Some respondents referenced wider economic hardship experienced by families, commenting changes to the NMS must avoid creating further financial barriers.
- Some respondents called for clearer commitments around early identification, specialist staff training, reasonable adjustments, and consistent support irrespective of postcode or local authority practices to support disabled children and children with ALN (11).
- Some respondents commented on the proposed changes relating to child minder ratios, wrap-around provision, and flexibility in delivery models. Many viewed the changes could improve accessibility and help parents manage work commitments, particularly in rural areas (10). However, one participant urged caution to ensure that flexibility does not compromise quality or children's rights (1).
- Some noted that a lack of Welsh-medium childcare directs families into English-medium settings due to cost or availability and asked the Welsh Government to consider how the NMS and related schemes can better support Welsh language continuity (6).
- Issues regarding workforce recruitment, retention, qualifications and sector viability was raised by some, noting the impact of low pay, challenges in meeting differing local authority quality requirements (such as Flying Start),

and difficulties in maintaining Welsh-speaking staff. These issues were seen as potential risks to quality and equal access (7).

- The strengthened references to the UNCRC were welcomed by some and emphasised the need to maintain a child-centred approach when considering ratios, staffing and funding changes; that best-interest principles should not be overridden by economic or operational pressures (5).
- Some respondents highlighted the wider impact of poverty and socio-economic disadvantage on access to childcare (7). They noted that families often reduce work hours or withdraw children from preferred settings due to financial pressures, travel limitations or inflexible provision. These issues were seen as particularly acute for rural families and those seeking Welsh-medium care.

### **Welsh Government response**

The Welsh Government has considered comments as part of updating the Integrated Impact Assessment.

**Engagement Question J: A draft Equalities Impact Assessment has also been developed as part of this exercise; to assist us further please add any comments on any impacts you feel the changes could have on people with protected characteristics (including evidence you feel should be considered)?**

28 comments were received to this question.

Responses to this section of the consultation indicated strong support for strengthening equality and inclusion within the revised National Minimum Standards (NMS). Overall, respondents endorsed continuing to strengthen the NMS in ways that promote equitable access to high-quality childcare for all children. They also emphasised that the successful realisation of these aims depends on practical implementation support, investment in the workforce, and attention to the diverse needs of settings and families across Wales.

The following section summarises the themes raised, alongside the number of respondents who referenced each theme:

- Some respondents noted that changes to the NMS must ensure that children with additional needs are fully included in everyday practice, not solely through policy statements. Respondents welcomed proposals for more flexible staff deployment and additional support, noting that children with complex health needs frequently face barriers in accessing childcare. Sufficient funding and practical guidance were factors raised which could impact the implementation of inclusive arrangements (16).
- Respondents commented on the need for comprehensive staff training that covers ALN, disability awareness, inclusive communication, cultural competence, and implementation of anti-racist practice. The importance of access to funded, consistent and accessible training pathways was

highlighted, alongside concerns that workforce pressures risk undermining inclusion if training is not adequately supported (11).

- Some respondents encouraged embedding inclusion within everyday provision, with clearer alignment between the NMS and wider Welsh Government priorities such as Cymraeg 2050 and the Anti-racist Wales Action Plan (14).
- Some respondents commented on the presentation and clarity of documentation with suggestions made to improve readability (e.g., accessible fonts, spacing), providing clearer terminology, and ensuring the Equality Impact Assessment and related guidance are easy to locate. The inclusion of practical examples, case studies and clearer wording around requirements, particularly regarding medication administration and “reasonable adjustments” was welcomed (6).
- Some respondents raised the importance of addressing cultural and linguistic needs across childcare practice, emphasising the importance of respecting minority cultures, ensuring dietary and religious considerations are met, and supporting children’s linguistic identities across multiple languages (6).

### **Welsh Government response**

The Welsh Government has considered comments as part of updating the Integrated Impact Assessment.

### **Engagement Question K: Do you have any other comments or suggestions with regards to the NMS that you wish to provide at this time?**

34 comments were received to this question.

The following section summarises the themes raised, alongside the number of respondents who referenced each theme.

- Some respondents raised issues relating to adult–child ratios and the wider capacity pressures within settings. Comments highlighted the need for greater flexibility to accommodate family needs, manage wrap-around arrangements, and support sustainability. Respondents noted that increased or more lenient ratios supported by proportionate risk assessment, would allow providers to respond more effectively to fluctuating demand and support children more consistently (10).
- Some raised concerns regarding qualification expectations for staff and child minding assistants. Respondents noted the challenges of qualification requirements, recruitment difficulties, and the need for clarity on expectations for those “working towards” qualifications. Some emphasised the need for a nationally consistent approach to workforce development, including clearer guidance and accessible training routes (5).
- Some respondents stated that child minders often feel undervalued compared with other types of provision. Comments noted the need for greater recognition of the role of child minders, improved support for sustainability,

and acknowledgement of the unique contribution and financial pressures faced by home-based practitioners (6).

**Welsh Government response**

The Welsh Government has considered comments as part of updating the Integrated Impact Assessment.

## 5. Next Steps

The Welsh Government is grateful to everyone who took the time to respond to this consultation and attend the focus groups.

All responses from the consultation response form and focus groups have been thoroughly reviewed. However, as this is a summary document, not all comments raised will have been captured in this document.

The Welsh Government has considered the responses to the questions and will be taking forward the following changes:

1. Change the layout of each standard to include the child's voice and wellbeing outcome, moving to a HTML format.
2. Add in related regulations to each standard.
3. Add in further guidance to each standard.
4. Update the 'what do we mean by high quality chapter' as shown in the consultation document.
5. Implement the new definition for Open Access Play, and in collaboration with Play Wales consider any further refinements.
6. Update the First Aid requirements for Open Access Play. We will work in collaboration with Play Wales to consider any further refinements in response to feedback provided within the consultation.
7. Update the 'other staff' requirements for Open Access Play. We will work in collaboration with Play Wales to consider any further refinements required in implementing the change.
8. Update Standard 11 and introduce an additional supporting annexe within the NMS.
9. Add in an additional standard to clarify that the percentages of staff are across the setting. We will work with partners to consider any further refinements required to support with clarity.
10. Add in a standard on additional staff who are deployed to work with specific children may not be included in the overall ratios. We will work with partners to consider any refinements required to the wording of the standard.
11. Amend standard to allow child minding assistants to begin employment whilst working towards the required qualification, with the 6-month time limit with adherence to conditions set out within the supporting annexe.
12. Amend standard to clarify a defined time limit on child minding assistants being left in sole charge of children.
13. Update the child minder ratios and in collaboration with Coram Pacey Cymru consider any further refinements.
14. Implement an additional standard that children who are due to start full-time statutory schooling (reception year) in the September can be classed as over 5 years old in the summer holidays immediately before this for the purposes of the ratios relevant to child minders. We will consider comments in collaboration with Coram Pacey Cymru to consider whether any further refinements are required.

15. Amend the existing standard 15.2 (CM) to reflect that children aged 3-5 years old who attend an educational provision or a combination of an educational provision and wrap-around childcare within school hours at another setting for five or more hours per day could be classed as over 5 years old for the purposes of the ratios relevant to child minders. We will consider comments in collaboration with Coram Pacey Cymru to consider whether any further refinements are required.

We plan to release an updated version of the NMS as an HTML document, including the approved changes, in Summer 2026. Standalone standards for registered Open Access Play services will also be published in line with recommendation from the Ministerial Review of Play Report. All updates will become effective as soon as they are published.

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

All Wales Forum of Parents and Carers of People with Learning Disabilities

Anglesey Council

Bishopston Play Association

Blaenau Gwent CBC

Busy Bees Nursery

Care Inspectorate Wales (CIW)

Cardiff Council (Early Help)

Children in Wales

Clwb Cymer Ofal

Clybiau Plant Cymru Kids' Clubs

Coram PACEY Cymru

Dwylo hapus childminding

Early Years Wales

Emma's Childminding Services

ESTYN

Family Fund

Flying Start- Newport

Gemma- child minder

Gyngor Sir Ceredigion County Council

Julie Woods

Let's Grow - Terri Steele Childminding

Llinos Bowen- child minder

Little achievers childminding

Little Pandas childcare

Little Rosebuds Childcare (Childminder)

Melanie Phillips- child minder

Merthyr Tydfil CBC

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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.

Michelle Johnson- child minder  
Monmouthshire County Council  
Mudiad Meithrin  
National Day Nurseries Association (NDNA) Cymru  
Neath Port Talbot County Borough Council  
Plantos Ltd  
Play Wales  
Rebekah Robertson childminders  
Rhondda Cynon Taf County Borough Council  
Sarah- child minder  
Sarah Jones- child minder  
Sarah Meyer- child minder  
Samantha Morgan  
Social Care Wales  
St Peter's Out of School Care Limited  
The Lil Rascals  
Tina Freitas  
Torfaen County Borough Council  
Torfaen Play Service  
Viv Morgan- child minder

<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.