Welsh Government

Consultation – summary of response

Review of the Childcare Sufficiency Assessment Duty on Local Authorities

February 2026

Overview

Under the Childcare Act 2006 (Local Authority Assessment) (Wales) Regulations 2016, Local Authorities are required to assess childcare demand and availability every five years through the Childcare Sufficiency Assessment (CSA) which is covered under section 26 of The Childcare Act 2006.

This consultation set out a proposal for the future development of CSAs in Wales and sought views on how the CSA process and content may be improved and made fit for purpose to meet the needs of all stakeholders.

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: Review of the Childcare Sufficiency Assessment (CSA) Duty on Local Authorities: children's rights impact assessment | GOV.WALES

Contents

1. Introduction

This document outlines the responses received by the Welsh Government in response to the Consultation Document entitled 'Review of the Childcare Sufficiency Assessment Duty on Local Authorities.'

The consultation set out proposals for the future development of CSAs in Wales and views were sought on how the process and the content of the CSAs could be improved and made more fit for purpose to meet the needs of all stakeholders. The consultation proposed changes that would either be incorporated into Regulations or Statutory Guidance.

A full 12-week consultation took place between 25 July 2025 and 17 October 2025. The consultation document contained three sets of questions, aimed at capturing the views of specific audiences, which include:

A) Responses primarily aimed at Practitioners and Policy Makers (stakeholders in the public, private and voluntary sectors who are either involved in undertaking the CSAs or whose policy area interacts with it e.g. transport, health, education, social services, community and economy).

B) Responses from Parents/Carers (potential and existing).

C) Responses from Childcare Providers (potential and existing)

2. Overview of Responses

A total of 61 responses were received from organisations and individuals of which 23 respondents requested anonymity. Reponses were as follows:

Response	Percentage	Number
Response form primarily aimed at Practitioners and Policy Makers[1]	57.38%	35
Response form for Parents / Carers (potential and existing)	37.70%	23
Response form for Childcare Providers (potential and existing)	4.92%	3

[1] stakeholders in the public, private and voluntary sectors who are either involved in undertaking the CSAs or who's policy area interacts e.g. transport, health, education, social services, community and economy

The number of respondents by type was as follows:

Respondents	Percentage	Number
Local Authority	31%	19
Childcare Providers	2%	1
Other organisations (stakeholders in the public, private and voluntary sectors including charities, advocacy groups, professional associations, regulatory bodies, who are either involved in undertaking the CSAs or who's policy area interacts)	25%	15
Did not specify	43%	26

Not all respondents answered every question and those that answered 'yes', 'no' or 'not applicable' didn't always provide comments. In addition, some respondents did not answer 'yes', 'no' or 'not applicable' but have provided comments. Therefore, the percentages in the narrative describing the comments are based on the total number of comments which have been received, not the total number of responses received.

The consultation set out to:

- Ensure CSAs are fit-for-purpose for the future.

- Ensure minimum burden on Local Authorities in completing the assessment.

- Provide better alignment and integration with other key planning and assessment processes at a local and national level.

- Ensure that there is information available around the sufficiency of childcare including the issues, challenges and barriers to inform the development of national policies and programmes and provide an all-Wales level picture of provision.

- Ensure it provides relevant and timely information to assist Local Authorities in planning for the sufficiency of childcare to inform local strategies and policies including those delivered through partners and stakeholder organisations.

- Ensure that parents, carers, childcare providers, employers, children and young people are reassured that, as far as is possible, sufficient childcare is available in their areas.

3. **Summary of Responses to Specific Consultation Questions Primarily Aimed at Practitioners and Policy Makers**

Most of the questions asked for a 'Yes', 'No', or 'Not applicable' response, along with any supporting comments. Not all respondents answered every question and those that answered 'yes', 'no' or 'not applicable' didn't always provide comments. In addition, some respondents did not answer 'yes', 'no' or 'not applicable' but have provided comments. A summary of the responses received to the questions put forward within the consultation and key findings from the comments are provided below.

Question 1: Will the proposed changes to the Regulations help reduce burden and provide meaningful and timely information to enable Local Authorities to assess and manage the sufficiency of childcare provision in their area?

A total of 35 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	51%	18
No	34%	12
Not applicable	9%	3
Comments only provided	6%	2

Out of a total of 35 responses, 34 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question. Their observations highlighted how the proposals could help reduce burden and contribute to a more meaningful and robust process, while also identifying concerns and suggesting areas that warrant further consideration.

Some of the key findings from those who provided comments are summarised below:

- Respondents welcomed the updates and additions to the CSA process, noting that increased flexibility would allow Local Authorities to better address local needs and demographics. There was consensus that streamlining reporting requirements and providing clearer definitions would be beneficial, but concerns were raised that the process of collating and analysing data and the large amount of written information still required would continue to be time-consuming (41% of those who provided comments (14)).

- Respondents broadly welcomed the proposals as being more meaningful and flexible, however, respondents remained uncertain over whether they would reduce the workload and administrative burden for Local Authorities. Calls were made for proportionate templates to be included in the Statutory Guidance to aid consistency and avoid unnecessary workload. (32% of those who provided comments (11)).

- Respondents observed that any reduction in burden would depend on improvements to the sharing and central processing of data and called for the Welsh Government to provide Local Authorities with cleansed and analysed datasets. (32% of those who provided comments (11)).

- Respondents regarded the expansion of consultation requirements to include more groups (such as third sector organisations, families with disabled children, minority groups, and Local Health Boards) as positive for inclusivity (12% of those who provided comments (4)). However, 24% of those who provided comments (8) felt it could be an additional administrative burden.

Overall, respondents who provided comments expressed broad support for the proposals and offered constructive feedback that will be valuable in facilitating the effective implementation of the revised regulations.

Question 2: Do you agree with the proposal to maintain a five-year CSA cycle, with annual action plans and progress reports?

A total of 33 responses were received to this question, of which respondents answered as follows:

Answer	Percentage	Number
Yes	76%	25
No	21%	7
Not applicable	3%	1

All 33 respondents provided comments in relation to this question.

The majority of respondents (76%) expressed strong support for retaining a five-year CSA cycle. Some of the key findings from those who provided comments are summarised below:

- Many respondents felt that a five-year statutory CSA cycle provides enough time for meaningful long-term planning, aligns with other local and national strategies, and reduces the administrative burden on Local Authorities (67% of those who provided comments (22)).

- Some respondents saw annual action plans and progress reports as essential for keeping information current, monitoring progress, and allowing timely responses to emerging needs or changes. It was felt this approach enables Local Authorities to set and assess short, medium, and long-term goals (42% of those who provided comments (14)).

- Some suggested that annual updates were valued for enabling Local Authorities to adapt to emerging trends, track progress, and identify barriers in real time (16% of those who provided comments (6)).

A small minority (21%) of respondents expressed concerns around the five year cycle. The main concerns highlighted by those who provided comments include:

- A view from some respondents that a five-year cycle may result in outdated assessments, particularly in areas experiencing rapid demographic, policy, or economic changes (12% of those who provided comments (4)).

- A small number of respondents proposed a three-year cycle to ensure that CSAs are more responsive to the evolving needs of families and that a shorter cycle would allow for more timely identification of gaps and barriers and would better support the collection of quantitative data necessary to accurately inform future action plans (6% of those who provided comments (2)).

The strong support expressed by the majority of respondents for retaining the five-year cycle serves to address and mitigate many of the concerns raised regarding timeliness and responsiveness of CSAs, to be addressed through the implementation of annual action plans and progress reports.

Question 3: Do the Regulations allow sufficient alignment between the CSA and other planning processes such as Local Well-being Plans under the Well-being of Future Generations (Wales) Act 2015, Play Sufficiency Assessments and Welsh in Education Strategic Plans?

A total of 34 responses were received to this question as follows:

Answer	Percentage	Number
Yes	61.8%	21
No	23.5%	8
Not applicable	8.8%	3
Comments only provided	5.9%	2

Out of a total of 34 responses, 31 respondents provided comments in relation to this question.

The majority of respondents (61.8% of respondents (21)) expressed that the regulations allowed sufficient alignment between the CSA and other planning processes. From those who provided comments, the main areas highlighted include local Well-being Plans, Play Sufficiency Assessments (PSAs), and Welsh in Education Strategic Plans (WESPs). It was felt this integrated approach supports greater coherence across early years, education, language development, and well-being services. However, 34% of those who provided comments expressed concerns about the current lack of alignment between the CSA and other statutory planning processes such as Local Well-being Plans, PSAs, and WESPs, noting this could result in fragmented services and lost opportunities for integrated support.

Despite the concerns raised, overall, there was strong recognition that the proposals allowed for sufficient alignment between the CSA and other planning processes, fostering greater coherence and collaboration across key policy areas and processes.

Question 4: Do you believe that the introduction of annual Local Authority CSA action planning monitoring meetings with Welsh Government, which will be included as part of the Statutory Guidance, will be useful to monitor progress on actions taken forward to achieve sufficiency, and the challenges affecting the childcare market?

A total of 35 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	91%	32
No	6%	2
Not applicable	3%	1

Out of a total of 35 responses, 34 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable

insights irrespective of whether they answered yes or no to the question. Their observations highlighted the value of the CSA action planning monitoring meetings, while also identifying concerns and suggesting areas that warrant further consideration.

Some of the key findings from those who provided comments are summarised below:

- Respondents valued the opportunity for ongoing dialogue, timely feedback, and early identification of challenges, which was felt would enable more responsive and targeted interventions to improve childcare sufficiency (65% of those who provided comments (22)).

- Support was expressed for the ethos of the proposed approach, with respondents welcoming opportunities for greater communication, more robust monitoring, and joint problem-solving between Welsh Government and Local Authorities (50% of those who provided comments (17)).

- Some respondents felt that annual monitoring meetings with Welsh Government would increase accountability and help address challenges and gaps and monitoring progress on action plans (15% of those who provided comments (5)).

- Some felt that annual monitoring meetings would promote transparency, encourage collaboration and shared learning between Welsh Government and Local Authorities and facilitate the sharing of best practice regionally and nationally (9% of those who provided comments (3)).

- Some thought that Welsh Government would benefit from a national overview, helping to ensure consistency, identify wider trends, and inform policy development (9% of those who provided comments (3)).

- Some respondents suggested the inclusion of feedback from early years stakeholders or parents in the process, supporting the identification of best practice and ensuring local needs and perspectives feed into national planning. (9% of those who provided comments (3)).

- Some comments related to uncertainty about the direct usefulness of the Annual Meetings for Local Authorities unless discussion points were clearly set out and linked to future planning. (6% of those who provided comments (2)).

Overall, respondents (91%) generally considered that the establishment of annual Local Authority CSA action planning monitoring meetings with Welsh Government would be beneficial for tracking progress on actions implemented to achieve sufficiency and for addressing the challenges impacting the childcare sector.

Question 5: How can local knowledge and intelligence be better incorporated into the CSA process to make it more meaningful and robust?

A total of 32 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations. Some of the key findings from those who provided comments are summarised below:

- Respondents emphasised the importance of incorporating local knowledge, intelligence, and lived experience at every stage of the CSA process to provide context, explain anomalies, and ensure a full and accurate picture of supply and demand (47% of those who provided comments (15)).

- Respondents felt that ongoing engagement with a wide range of stakeholders (including childcare providers, parents, carers, third sector organisations, and community networks) were essential to gathering qualitative insights and capturing the real needs of families, including underrepresented groups as it was felt they helped identify capacity issues, sustainability concerns, and emerging trends more promptly than relying on static or infrequent data collections (25% of those who provided comments (8)).

- Respondents highlighted that combining quantitative data (such as Care Inspectorate Wales' Self-Assessment of Service Statement, live birth data, Health Boards' data, and Family Information Service data) with qualitative intelligence (such as local feedback, anecdotal evidence, and lived experiences) produced a more robust and meaningful assessment of childcare provision and gaps (22% of those who provided comments (7)).

- Respondents felt that local knowledge was key for understanding the impact of issues like rurality, employment patterns, transport, language needs, and population mobility (e.g., armed forces families), which may not be evident in quantitative data alone (16% of those who provided comments (5)).

- Respondents valued the freedom to include narrative and contextual information in reports. It was recommended that guidance be strengthened to highlight the value of local intelligence, while also advocating for better sharing of national datasets to reduce duplication and staff workload (13% of those who provided comments (4)).

Question 6: Will basing the CSA on information from a broad range of sources and using proxy measures help provide a more robust assessment? (Proxy measures are indirect indicators that can be used to assess a feature that is difficult to measure directly).

A total of 34 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	82%	28
No	9%	3
Not applicable	3%	1
Comments only provided	6%	2

Out of a total of 34 responses, 33 respondents provided comments in relation to this question. The majority of respondents (82%) were in agreement that using information from a broad range of sources and using proxy measures could help provide a more robust assessment. Some of the key findings from those who provided comments are summarised below:

- Respondents agreed that using a broad range of data sources and proxy measures, alongside direct data, would generally improve the robustness and meaningfulness of CSA. They emphasised that collaboration between Welsh Government, Local Authorities, and sector organisations was important for identifying relevant proxy measures, clarifying definitions, and ensuring consistency across Wales (58% of those who provided comments (19)).

- Respondents noted that proxy measures were useful, especially where direct data was limited or hard to obtain (e.g., for children with additional needs or rapidly changing populations), but cautioned that such measures were not always fully accurate and could lead to unintended consequences if not managed carefully (70% of those who provided comments (23)).

- Respondents pointed out that using consistent data sources and proxy measures across all Local Authorities enabled better comparison, trend analysis, and strategic planning, but there was a need for careful interpretation to avoid generalisations or incorrect assumptions based on proxy data alone. They called for clear Statutory Guidance, providing clarity on acceptable proxy measures and how they should be applied, to ensure validity, reliability, and comparability of assessments across Wales (18% of those who provided comments (6)).

The majority of respondents (82%) agreed that basing the CSA on a broad range of sources and using proxy measures would lead to a more robust and meaningful assessment. Comments indicate that while proxy measures are especially valuable where direct data is limited, respondents emphasised the need for clear guidance and careful interpretation to ensure consistency and reliability across Wales.

Question 7: What relevant definitions could be improved and/or templates included in the Statutory Guidance to aid consistency in data interpretation and analysis?

A total of 24 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights to support the implementation of the regulations. Some of the key findings from those who provided comments are summarised below:

- Respondents noted the need for clear and, consistent definitions for childcare types and services, such as wrap around childcare, full day care and sessional care; and language categories, noting that ambiguous terminology led to regional variation and confusion (33% of those who provided comments (8)).

- Respondents noted that templates for data collection, action plans, and reporting should be standardised, streamlined, and simplified to reduce administrative burden and support more meaningful, comparable data across Wales (29% of those who provided comments (7)).

- Some respondents felt that Statutory Guidance should be revised, to reflect current terminology and legislative changes, and ensuring it is made available to Local Authorities well in advance of the next CSA cycle (21% of those who provided comments (5)).

- Some respondents felt that current templates and surveys (such as the parent/carer and childcare provider questionnaires) were too lengthy or complex, which discouraged participation and made analysis difficult (17% of those who provided comments (4)).

- A small number of respondents noted that terminology and categories used by Care Inspectorate Wales should be revised to align with statutory guidance, and that definitions such as full day care and sessional care needed clarification to reflect actual practice (8% of those who provided comments (2)).

- A small number of respondents noted the importance of ensuring that Welsh language categories matched those used in Welsh in Education Strategic Plans, and that the language medium and long-term linguistic outcomes for children should be clearly set out (8% of those who provided comments (2)).

Question 8: Do the childcare services captured against the childcare types in Schedule 3 of the current Statutory Guidance reflect the way in which services are interpreted in the current landscape?

A total of 32 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	38%	12
No	59%	19
Not applicable	3%	1

Out of a total of 32 responses, 25 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question.

Whilst 38% of respondents were in agreement that the childcare services captured against the childcare types reflect the way in which services are interpreted in the current landscape, 59% of respondents did not believe this to be the case. Some of the key findings from those who provided comments are summarised below:

- There was a call for clearer, updated definitions and categories within the Statutory Guidance to improve consistency, accuracy, and relevance in CSAs conducted by Local Authorities (40% of those who provided comments (10)).

- Many of those providing comments noted concerns regarding the accuracy and practicality of services listed in Schedule 3 of the Statutory Guidance, with specific mention that categories such as half-day sessions, creche provision, and "other" confused both parents and providers, and risked obscuring useful data (68% of those who provided comments (17)).

- Some respondents felt that the range and categorisation of childcare services did not fully reflect the current landscape, with many providers offering blended or flexible models, and parental needs varying according to age, location, and time of day (16% of those who provided comments (4)).

- One respondent suggested streamlining categories to focus on practical distinctions: wrap-around care; before/after school provision; full-day care; part-day session; and holiday care - and being clear on what is classified as childcare (4% of those who provided comments).

- One respondent suggested that Open access playwork and holiday playschemes should not be classified as childcare, as this conflicted with the

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ethos of play as a child's right. However, there was agreement that any final definition should align with ongoing Welsh Government consultations[2] (4% of those who provided comments).

In summary, respondents who provided comments believe the Statutory Guidance should be updated. They feel it needs clearer categories and definitions to better reflect today's diverse and adaptable childcare services. These changes would improve consistency, make the data more relevant and useful, and help parents and providers make better-informed decisions. This feedback will be considered when developing the revised Statutory Guidance.

Question 9: Do you think the surveys included in schedules 4, 5 and 6 of the current Statutory Guidance are fit-for-purpose?

A total of 33 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	12%	4
No	76%	25
Not applicable	6%	2
Comments only provided	6%	2

Out of a total of 33 respondents, 29 provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question.

The majority of respondents (76%) were of the opinion that the surveys were not fit for purpose. Approximately half (48%) of respondents (14) who provided comments reported that the surveys and questionnaires, particularly those in Schedules 4, 5, and 6, were excessively long, complicated, and time-consuming to complete. This was seen as a major barrier to completion and accuracy, resulting in low response rates and incomplete or inaccurate data.

There were strong calls for the surveys to be streamlined, made shorter, and clarified – both for providers and for parents/carers. It was suggested that the surveys should be reviewed and updated in partnership with the childcare sector and parents, with a focus on removing or simplifying questions, minimising duplication, and using clear, accessible language to accommodate those with lower literacy skills. Suggestions

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[2] Consultation relating to National Minimum Standards and the Exceptions Order carried out in 2025.

were also made for more effective and concise ways to collect family aspirations and experiences, such as integrating questions into existing touchpoints (e.g., during vaccination appointments).

Some of the key findings from those who provided comments are summarised below:

- Respondents called for making the process less burdensome for providers, particularly for sole childminders, and ensuring that any required information was relevant, easy to complete, and genuinely useful for planning and analysis (34% of those who provided comments (11)).

- Respondents raised concerns about unnecessary duplication of data, especially where information was already being collected by the Self-Assessment of Service Statement (SASS), Care Inspectorate Wales, and Local Authorities. Respondents suggested that existing data sources should be used wherever possible, and that the surveys should focus on gathering qualitative insights not available elsewhere (31% of those who provided comments (9)).

- Respondents highlighted that the parent and provider surveys did not sufficiently address the specific needs and experiences of families with disabled children and those with emerging needs/Additional Learning Needs (24% of those who provided comments (7)).

- Respondents highlighted that much of the required workforce data was already held by Local Authorities or through other systems, making inclusion in the surveys unnecessary. There were also calls for more relevant workforce questions, such as staff turnover and retention rates (14% of those who provided comments (4)).

- Recommendations were made to update the surveys to reflect changes in regulatory bodies (e.g., from CSSIW to Care Inspectorate Wales) and to ensure alignment with current legislation, such as the emerging needs/Additional Learning Needs Code of Practice and the Social Care Wales Qualification Framework (14% of those who provided comments (4)).

- Respondents acknowledged that the surveys collect useful information about childcare types, how often services are used, and what's available but felt they are too long in their current format (10% of those who provided comments (3)).

In summary, respondents highlighted the need for significant streamlining and clarification of the surveys included in the current Statutory Guidance, with a focus on reducing duplication and ensuring relevance to all families and providers. These

insights will be instrumental in shaping the revised Statutory Guidance, to support more effective, inclusive, and practical data collection to inform future childcare policy and provision.

Question 10: What additional surveys or methods would you recommend to help Local Authorities gather data to assess childcare demand more effectively?

A total of 31 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations.

Some of the key findings from those who provided comments are summarised below:

- Some respondents felt that the current CSA and related forms were overly long and complex, recommending streamlining and better alignment with other statutory assessments to avoid duplication and reduce burden. They expressed a preference for more user-friendly methods of collecting information, such as image-based surveys with concise questions, instead of additional traditional surveys (13% of those who provided comments (4)).

- One respondent thought that localised surveys for parents in areas with potential gaps in childcare provision were more effective in understanding demand than broader, generic surveys conducted across entire boroughs (3% of those who provided comments).

- One respondent suggested working with schools, emerging needs/Additional Learning Needs co-ordinators, and health professionals (such as Health Visitors), as these professionals often know which families are struggling to find suitable childcare and the reasons why (3% of those who provided comments).

- One respondent suggested that additional surveys and methods could be used to help Local Authorities better understand childcare demand for families with children with an Additional Learning need/disability. Questions could include how easy it is to use childcare, how affordable it is, whether settings are accessible and what support is missing (3% of those who provided comments).

- One respondent suggested that examining how current childcare settings were improving their engagement with people who have protected characteristics, supported by local knowledge and training initiatives like

Diversity and Anti-Racist Professional Learning (DARPL), could provide more meaningful insights (3% of those who provided comments).

- One respondent felt that use of existing surveys (for example such as those conducted by the Family Fund) which could include further questions about childcare, would give a clearer picture of what support is needed and provide important information about the financial pressures families face (3% of those who provided comments).

Question 11: Are there further improvements you think could be made to reduce the administrative burden and resources involved in collating data and information to assess childcare supply and demand?

A total of 31 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations. Some of the key findings from those who provided comments are summarised below:

- Some suggested that Welsh Government should provide analysed information and simplified, pre-populated datasets rather than raw or anonymised data. It was felt that this would ensure consistency across Local Authorities and enable more efficient analysis and comparison (42% of those who provided comments (13)).

- Some respondents reported a need for improved digital solutions, such as online and regularly updated CSAs, centralised data systems, and collaborative digital platforms for real-time data sharing among stakeholders (26% of those who provided comments (8)).

- Some respondents highlighted their preference for standardised and streamlined data collection tools, such as universal or national templates, online portals, and shared dashboards, to reduce duplication of effort and administrative burden for both Local Authorities and childcare providers (19% of those who provided comments (6)).

- Some respondents called for greater integration and data sharing between Welsh Government, Care Inspectorate Wales, Family Information Service, and Local Authorities, as well as better use of existing data and collaboration with third sector organisations and national childcare and play representative bodies (19% of those who provided comments (6)).

- Some respondents suggested the consolidation of multiple surveys into a single, accessible annual survey for parents and providers, highlighting that survey fatigue and repeated requests led to lower response rates and unnecessary workload (10% of those who provided comments (3)).

Question 12: Do you think that introducing a more standardised approach to the way in which information is collated and reported (for example, through templates) would be useful to Local Authorities in undertaking the CSA process?

A total of 34 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	85%	29
No	9%	3
Not applicable	3%	1
Comments only provided	3%	1

Out of a total of 34 responses, 33 respondents provided comments in relation to this question.

There was considerable support for adopting a more standardised approach to the way in which information is collated and reported, with 85% (29) of respondents agreeing with this approach. Respondents provided a wide range of detailed feedback, offering valuable insight into the potential benefits and areas for consideration in adopting this approach.

Some of the key findings from those who provided comments are summarised below:

- Respondents felt that standardised templates and processes would save time, reduce duplication of effort, and support Local Authorities with limited analytical capacity. This approach was also seen to promote transparency and allow Welsh Government and other bodies to identify trends and gaps more effectively. It was suggested that any new templates or processes should be developed in consultation with Local Authorities, ensuring they were practical, proportionate, and reflected local realities (55% of those who provided comments (18)).

- Respondents widely supported greater consistency and standardisation in CSA data collection and reporting across Wales and highlighted that current variations in how Local Authorities collect and use data made it difficult to compare information or form a complete national picture. A unified approach was believed to aid cross-boundary collaboration and make the process more efficient for Local Authorities, stakeholders, and families (48% of those who provided comments (16)).

- Respondents noted that using information from existing sources (such as CIW SASS) and aligning with the revised regulations would further streamline the process and avoid unnecessary burdens on Local Authorities and childcare providers (6% of those who provided comments (2)).

- One respondent recommended that a standardised approach should remain optional or flexible to accommodate the unique circumstances of each Local Authority (3% of those who provided comments).

Overall, the majority of respondents supported a more standardised, streamlined approach to data collection and reporting within the CSA process, highlighting its potential to improve efficiency, consistency, and the ability to identify trends across Wales. The feedback emphasises the importance of developing practical solutions in close consultation with Local Authorities to ensure any changes are proportionate, relevant, and genuinely reduce administrative burden.

Question 13: Do you agree that the proposed amendments to the Regulations adequately address the issues which have been identified?

A total of 32 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	41%	13
No	47%	15
Not applicable	9%	3
Comments only provided	3%	1

Out of a total of 32 responses, 24 respondents provided comments in relation to this question. There were mixed views as to whether the proposed amendments to the Regulations adequately address the issues that have been identified with 41% believing they do and 47% of respondents who disagree.

Despite some positive changes, respondents consistently felt that the amendments did not go far enough to genuinely reduce the workload for Local Authorities or make the CSA a more meaningful and user-friendly document. Some of the key findings from those who provided comments are summarised below:

- Respondents believed that while some updates were welcome (such as clearer guidance, inclusion of underrepresented groups, and a focus on provision for disabled children) the overall process remained complex, time-

consuming, and resource-intensive for Local Authorities (46% of those who provided comments (11)).

- Respondents felt that the revised CSA process would continue to place a heavy administrative burden on Local Authorities due to the large volume of information required. Many felt that the amendments had not reduced this burden and, in some cases, had increased it by adding new requirements such as consulting with additional stakeholders (38% of those who provided comments (9)).

- One respondent highlighted the need for better use of proxy measures and standardised data templates, along with clearer guidance on data collection. It was felt that the current data requirements were too detailed, did not necessarily add value to policy development or resource allocation and the level of detail expected was overwhelming and risked obscuring key findings. Improved flexibility and alignment with wider planning duties, as well using existing data sources was highlighted (4% of those who provided comments).

In conclusion, while respondents welcomed several improvements, they also expressed some ongoing concerns about the complexity and administrative demands of the revised process. Respondents broadly agreed with the adoption of proxy measures, standardised data templates, and clearer guidance to streamline data collection, alongside greater flexibility and alignment with existing planning duties.

Question 14: Do you agree that the detail below provides sufficient clarity on the services to be captured in relation to the Schedule 'Matters to be contained in the assessment' 2(i) of the proposed revised Regulations (the intention is to include this in the Statutory Guidance)?:

> **atypical hours;**
>
> **full- and part-time care;**
>
> **full day;**
>
> **AM/PM;**
>
> **wrap around (am/pm/lunch);**
>
> **holiday; and**
>
> **term time.**

A total of 34 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	56%	19
No	32%	11
Not applicable	9%	3
Comments only provided (the respondent outlined the question was unclear)	3%	1

Out of a total of 34 responses, 23 respondents provided comments in relation to this question. Whilst the majority of respondents (56%) indicated that the revised regulations provided adequate clarity regarding the services to be included, 32% expressed concerns that the level of clarity was insufficient. Some of the key findings from those who provided comments are summarised below:

- Many of those who commented highlighted a lack of clear definitions for key terms such as "atypical hours", "wraparound care", "full day", "Welsh medium", and "bilingual" settings was highlighted by a significant proportion of respondents (61% of those who provided comments (14)).

- Respondents requested that the guidance include specific definitions and examples to ensure consistent interpretation of service types among providers, practitioners, and parents, so that information gathered is accurate and comparable across different Local Authorities. They noted that "atypical hours" needed clarification, including whether it should cover overnight, weekend, and shift patterns. There was concern that providers and staff might interpret this term differently, leading to inconsistent reporting (61% of those who provided comments (14)).

- Respondents called for more detail and clarity for service categories such as: before and after school care; sessional/holiday care; partial holiday care; and where breakfast clubs fit within wraparound provision. There was also a suggestion to include a glossary of terms in the statutory guidance (17% of those who provided comments (4)).

- One respondent requested greater clarity regarding how data should be collected for the range of services, including capacity, the impact of population changes, and how relevant demand should be defined and assessed by Local Authorities (4% of those who provided comments).

Overall, the majority of respondents were broadly satisfied with the clarity provided in the revised regulations, whilst also highlighting the need for further consideration of definitions and guidance to support consistent interpretation. Respondents welcomed the opportunity for additional refinements, recognising that these would help ensure services are accurately captured and reported by Local Authorities.

Question 15: Under the Schedule 'Matters to be contained in the assessment' 2(l), do the following factors provide sufficient clarity on the information which Local Authorities should consider in relation to demand (the intention is to include this in the Statutory Guidance):

> **parents' preferences for type and range of service;**
>
> **times childcare is required;**
>
> **Access to provision that provide support for children with Additional Learning Needs and specialist care due to a disability;**
>
> **access to state subsidised childcare;**
>
> **the number of childcare places required for children up to the age of 12, broken down by age range and type;**
>
> **Welsh language childcare services required;**
>
> **Other language childcare services required; and**
>
> **Access to provision that offer the childcare cost element of Working Tax Credit or the childcare costs element of Universal Credit.**

A total of 33 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	54.55%	18
No	33.33%	11
Not applicable	9.09%	3
Comments only provided	3.03%	1

Out of a total of 33 respondents, 23 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question. Whilst the majority of respondents (54.55%) were in agreement that the factors provided sufficient clarity on the information which Local Authorities should consider in relation to demand, 33.33% of respondents did not believe this to be the case. A summary of the key findings from those who provided comments are summarised below:

- Limitations to accurately quantify demand and translating it into effective service provision were cited – such as: low survey response rates, the individual nature of family needs, and the changing childcare landscape (22% of those who provided comments (5)).

- A small number of respondents felt that collecting sufficient detail for accurate reporting remained very challenging (13% of those who provided comments (3)).

- Parental preferences were considered important but difficult to quantify, and demand data often depended on how parents interpreted survey questions based on their personal circumstances (9% of those who provided comments (2)).

- A small number of respondents felt that there was a need to ensure the wording in the Statutory Guidance matched the Regulations (such as funded childcare/state subsidised childcare), and distinctions between need and preference were not clearly reflected, potentially resulting in unreliable data for planning purposes (9% of those who provided comments (2)).

- Cultural and religious needs were flagged as being important to childcare choice. It was also acknowledged that geographical factors, especially in rural areas, and regular family relocations (such as those experienced by army families) posed additional barriers to accessing childcare (9% of those who provided comments (2)).

- Whilst the framework for assessing demand was strong, one respondent felt that more qualitative feedback and clearer definitions were needed to ensure consistent interpretation and robust data collection. (4% of those who provided comments)

Overall, most respondents were satisfied with the clarity of the factors set out for Local Authorities when assessing demand, recognising the framework as broadly effective. Nevertheless, they emphasised the importance of further refinements and clearer definitions to support consistently robust data collection and ensure all needs are accurately captured.

Question 16: Are there any potential challenges or barriers you anticipate in implementing the revised Regulations for Local Authorities?

A total of 33 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	54.55%	18
No	27.27%	9
Not applicable	15.15%%	5
Comments only provided	3.03%	1

Out of a total of 33 respondents, 23 provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question, with 54.55% highlighting potential barriers and challenges in implementing the revised regulations.

The main barriers and challenges highlighted by respondents predominantly related to stakeholder engagement and data capture. A summary of the findings from those who provided comments, grouped by theme, are included below:

Stakeholder Engagement

- Some respondents felt that repeated surveys led to engagement fatigue, and collecting meaningful input from underrepresented groups remained a persistent challenge, and it was felt the expansion of required consultation groups placed an increased burden on Local Authorities – particularly as they did not always yield proportional benefits. They noted that some groups remained hard to reach despite best efforts (30% of those who provided comments (7)).

Data capture

- Some respondents reported a lack of clarity on what data Local Authorities were expected to collect, especially regarding unregistered childcare provision and the capacity of providers related to Universal Credit (22% of those who provided comments (5)).

- Some respondents felt that gathering comprehensive data for the CSA was difficult, with concerns over the accuracy and accessibility of available data, particularly for children with additional needs or disabilities. Respondents highlighted that demand fluctuated, making supply and demand analysis challenging, and noted that population forecasts often became outdated quickly due to migration and changing demographics (17% of those who provided comments (4)).

- There was a suggestion that national-level datasets, proxy indicators, and analytical support should be provided by Welsh Government to ensure equity across Local Authorities. They proposed streamlined forms at key stages (e.g., health visitor checks and end of Flying Start entitlement) and more strategic, simplified parent surveys to improve data quality and early identification of childcare needs (9% of those who provided comments (2)).

- One respondent highlighted that further detail required around assessing demand for families raising disabled children, highlighting that guidance

should include clear examples of inclusive childcare and proxy indicators for demand (4% of those who provided comments.

- One respondent expressed concern that Local Authorities, especially smaller ones, lacked the analytical capacity and resources to process and interpret the data required as part of the CSA process. A respondent commented that time constraints, staff capacity, funding pressures, were significant barriers to effective implementation (4% of those who provided comments).

Overall, respondents were generally content with the revised regulations, recognising their effectiveness while also identifying areas for further consideration. They emphasised the importance of refining guidance and providing additional support to ensure consistent and robust implementation across Local Authorities, which will be considered further by the CSA working Group.

Question 17: Does the draft Regulatory Impact Assessment capture the potential consequences of the proposed amendments to the Regulations?

A total of 33 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	58%	19
No	27%	9
Not applicable	15%	5

Out of 33 respondents, 22 respondents provided comments in relation to this question.

Over half of respondents were in agreement that the draft Regulatory Impact Assessment (RIA) captured the potential consequences of the proposed regulations (58% of respondents (19)), whilst 27% of respondents (9) did not agree this was the case. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question. Some of the key findings from those who provided comments are summarised below:

- Respondents noted that the proposed changes were intended to reduce the administrative burden of assessing childcare supply and demand, but felt there was no clear indication of how this reduction would actually be achieved (41% of those who provided comments (9)).

- Respondents noted that, whilst the proposed changes aim to streamline the CSA process, the revised CSA process appears to require more or equally detailed information to what is captured currently, with some reporting an increased workload due to additional requirements (such as engaging with a broader group of stakeholders and the introduction of annual monitoring meetings), along with more narrative content. There were calls for further engagement and clearer Statutory Guidance before the full implications of the proposed amendments could be understood (18% those who provided comments (4)).

- Respondents referred to children with Additional Learning Needs. It was stated that whilst the draft RIA recognised the complexity of assessing demand for children with emerging needs/Additional Learning Needs, it did not go far enough in reflecting the lived experiences of families, particularly regarding financial and accessibility challenges. It was also noted that data on children with Additional Learning Needs is difficult to capture (14% of those who provided comments (3)).

- Respondents referred to resources and felt that staff capacity and budgets, especially around translation costs and the need for funding across financial years needed to be factored in (14% of those who provided comments (3)).

Overall, respondents who provided comments acknowledged that the proposed changes aim to reduce administrative burden, but felt it was unclear how this would be achieved. Many of those who provided comments indicated that the new process might increase workload due to extra requirements, such as wider stakeholder engagement and the introduction of annual monitoring meetings. There were calls for clearer Statutory Guidance, further consultation, and concerns about data collection for children with Additional Learning Needs and the need for adequate resources, especially for staffing, translation, and multi-year funding.

Question 18: Do you think the draft Integrated Impact Assessment sufficiently covers the impact on children, families, those living in socio-economic disadvantage and people with protected characteristics (including evidence you feel should be considered)? (The protected characteristics are: Age; Disability; Gender reassignment; Marriage and civil partnership; Race; Religion or belief; Sex; and Sexual orientation)?

A total of 33 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	58%	19
No	27%	9
Not applicable	15%	5

Out of a total of 33 respondents, 17 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question.

Just over half of respondents (58% of respondents (19)) were in agreement that the draft Integrated Impact Assessment (IIA) sufficiently covers the impact on children, families, those living in socio-economic disadvantage and people with protected characteristics. Whereas a minority of those who provided comments (27% of respondents (9)) disagreed that the draft IIA sufficiently covers the impact on children, families, those living in socio-economic disadvantage and people with protected characteristics. Some of the key findings from those who provided comments are summarised below:

- Respondents felt that stronger consideration of all protected characteristics is needed, especially race, disability, language, and pregnancy and maternity, as identified in the Wales Equality Act (35% of those who provided comments (6)).

- Respondents felt that the draft Integrated Impact Assessment could be improved to address the impact on disabled children and those with emerging needs/Additional Learning Needs, particularly in terms of the quality, suitability, and consistency of childcare provision. Feedback noted that while accessibility was mentioned, there was a lack of detailed evidence and clear actions to demonstrate support for affected families (18% of those who provided comments (3)).

- A few respondents felt that the assessment focused more on the responsibilities and actions of Local Authorities rather than the direct impact on individual children and families. It was also felt that the assessment needed to reflect how frequent moves and relocations could disrupt continuity and access to childcare and support for families (18% of those who provided comments (3)).

- One respondent felt a clearer focus is required on ensuring sufficient childcare places for working families and those entering the workforce (6% of those who provided comments).

- One respondent suggested that the assessment should monitor both progress and impact (6% of those who provided comments). A further respondent suggested incorporating findings from parent surveys and focus groups, and to analyse uptake of funded childcare by ethnicity or disability status (6% of those who provided comments).

- One respondent highlighted that the Integrated Impact Assessment should consider the difficulties faced by families living in socio-economic

disadvantage, including engagement barriers due to lengthy and jargon-heavy questionnaires, and a lack of information about childcare options (6% of those who provided comments).

- One respondent felt that, whilst consultation with underrepresented groups (including Community Mentors) was referenced, further explanation of how their feedback would be used to make the CSA more inclusive and improve data collection across Wales is required (6% of those who provided comments).

Overall, respondents agreed that the draft assessment was sufficient but emphasised further consideration is required for all protected characteristics, particularly those outlined in the Wales Equality Act. They called for clearer evidence and actions for disabled children and those with Additional Learning Needs, more focus on direct impacts on families, consideration of disruptions from relocations, improved monitoring, better information for disadvantaged families, and a more inclusive approach to consultation and data collection.

Question 19: How can the proposed changes to the Regulations be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects on people with protected characteristics?

A total of 25 respondents answered this question. The following suggestions were made to ensure the regulations would not have adverse effects, or would have decreased adverse effects on people with protected characteristics:

- Respondents highlighted the importance of consulting directly with people and families who have protected characteristics, such as through focus groups, face-to-face meetings, and collaboration with representative community organisations (24% of those who provided comments (6)).

- Respondents commented on a need to strengthen inclusive language and clarify that childcare provision should be accessible, tailored, and inclusive for children with disabilities, including those needing complex or specialist care (20% of those who provided comments (5)).

- Respondents called for improving the accessibility of surveys and information gathering, such as making them compatible with handheld devices and providing support in multiple languages and accessible formats, along with a call for a 'toolkit' of methods for engaging with protected groups (12% of those who provided comments (3)).

- Respondents felt there was a need to recognise additional barriers faced by families, such as lack of trained staff, transport difficulties, digital exclusion,

and inflexible childcare hours for parents with irregular working patterns. Physical and sensory accessibility audits of childcare settings was recommended, with reports on reasonable adjustments required under the Equality Act 2010 (8% of those who provided comments (2)).

- Respondents suggested using proxy indicators, regular monitoring and review, and liaison with localised teams that support people with protected characteristics (8% of those who provided comments (2)).

- One respondent felt an assessment of whether current financial support mechanisms met the needs of families with disabled children and to recommend additional support where shortfalls were identified. They also felt that the introduction of annual reporting and independent oversight was needed to ensure that unmet needs are addressed and to promote transparency and accountability (4% of those who provided comments).

Question 20: Are there any aspects of the current Statutory Guidance that you feel are currently unclear?

A total of 32 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	53%	17
No	41%	13
Not applicable	6%	2

Out of a total of 32 respondents, 19 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question.

Just over half respondents (53% of respondents (17)) felt that certain aspects of the current Statutory Guidance required further clarity. Whereas just under half (41% of respondents (13)) didn't think there are any aspects of the current Statutory Guidance that are currently unclear. Some of the findings from those who provided comments include:

- Respondents felt that clearer, more prescriptive guidance and standardised templates, as well as proxy measures for data collection was needed to ensure consistent implementation across Local Authorities (74% of those who provided comments (14)).

- Respondents referred to terminology in the Statutory Guidance needing to be updated, including consistent Welsh language categories, and the addition of a glossary to explain different types of childcare, including standardised templates adaptable to local characteristics (15% of those who provided comments (3)).

- Respondents called for the Statutory Guidance to set out its purpose. It was felt there was confusion about the intended audience of the CSA, with calls for clarification on whether the focus is on working parents, parents in education or training, or all parents, including those supported by specific programmes (11% of those who provided comments (2)).

- One respondent called for the current Statutory Guidance and its associated schedules to be reviewed in partnership with stakeholders to ensure its purpose, relevance, and length is appropriate and that it captures the necessary information to support the CSA (5% of those who provided comments).

- One respondent felt there was a risk of the CSA becoming overly complex and serving too many audiences and called for more streamlined guidance (5% of those who provided comments).

- One respondent called for further information on the geographical distribution requirements (such as which statistical areas to use) (5% of those who provided comments). And one respondent felt that the Statutory Guidance should take account of planning for communities with rapidly changing circumstances, such as armed forces families (5% of those who provided comments).

- One respondent felt there was lack of guidance on incorporating informal or unregistered care and systematically including views of under-represented groups, such as minority ethnic families or children with emerging needs/Additional Learning Needs (5% of those who provided comments).

- One respondent expressed uncertainty about the value of collecting data on unregistered childcare provision, noting Local Authorities have limited capacity to influence private, independent, and voluntary sector providers, especially regarding reducing barriers for individuals with protected characteristics (5% of those who provided comments).

Overall, respondents highlighted the need for clearer, more prescriptive guidance, standardised templates, and proxy measures for data collection to ensure consistent implementation of the CSA across Local Authorities. There were calls to review and update the Statutory Guidance, including its purpose, relevance, terminology, and associated schedules, in collaboration with stakeholders to better support the CSA and clarify its intended audience. Some respondents expressed uncertainty about the value of collecting data on unregistered childcare, given Local Authorities' limited influence over private and voluntary providers, especially in relation to supporting

individuals with protected characteristics. Suggestions also included: updating Welsh language categories; adding a glossary; providing further detail on geographical distribution requirements; and ensuring the guidance addresses the needs of rapidly changing communities and under-represented groups, including minority ethnic families and children with Additional Learning Needs.

Question 21: Do you think clearer guidelines on unregistered providers would improve data collection?

A total of 34 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	73.53%	25
No	17.65%	6
Not applicable	8.82%	3

Out of a total of 34 respondents, 29 provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations.

Most respondents agreed that there needed to be clearer and more consistent national guidance to define unregistered provision, standardise data collection, and improve engagement. They felt this would help Local Authorities understand the full childcare landscape, better identify support and training needs, and ensure more accurate sufficiency assessments (74%) of respondents (25)). Some of the key findings from those who provided comments are summarised below:

- Respondents noted that unregistered provision, especially after-school care and informal arrangements, played a significant role in meeting the needs of working parents, rural communities, and disadvantaged areas (28% of those who provided comments (8)).

- Respondents highlighted that unregistered childcare providers were difficult to identify and reach, resulting in incomplete data and a patchwork approach to reporting across Local Authorities, particularly as there was no current obligation for unregistered providers to engage with Family Information Services or Local Authorities (24% of those who provided comments (7)).

Overall, the importance of capturing information on unregistered provision was highlighted to provide a more comprehensive assessment of the childcare market.

However, the difficulties in capturing this information was noted and there were strong calls for clearer guidance to define unregistered provision in line with the outcomes of the Exceptions Order consultation.

Question 22: What types of unregistered childcare provision do you think should be included in the CSA?

A total number of 30 respondents answered this question. Some of the key findings are summarised below:

- Respondents stressed that unregistered childcare provision should be included in the CSA to ensure a fuller picture of childcare availability and to help monitor child safety and quality standards. However, many acknowledged the challenges in gathering accurate data on informal or unregistered care (70% of those who provided comments (21)).

- Respondents highlighted that many parents relied on unregistered childcare provision, such as school breakfast clubs, after school clubs operating under two hours, play schemes, and the School Holiday Enrichment Programme, especially to fill gaps during holidays (23% of those who provided comments (7)).

- Respondents felt that only registered provision should be included in the CSA as it was more robust to track and one respondent (3%) felt it should be optional for Local Authorities to include information on local use of unregistered childcare specific to their area, reflecting on local knowledge, to include informal care by family, friends, or nannies, and other arrangements exempt under the Exceptions Order (17% of those who provided comments (5)).

- One respondent recognised that some types of provision, such as sports clubs or open access play schemes, may not primarily provide childcare and so should not necessarily be included in the CSA (3% of those who provided comments).

Question 23: Do you think the current Statutory Guidance allows for appropriate anonymised sharing of data (i.e sharing of SASS data from Care Inspectorate Wales)?

A total of 33 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	45.45%	15
No	33.33%	11
Not applicable	21.21%	7

Out of a total of 33 respondents, 22 provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question.

Many respondents (45.45% of respondents (15)) were in agreement that the current Statutory Guidance allows for appropriate anonymised sharing of data, but the minority of respondents felt this was not the case (33.33% of respondents (11)). Some of the key findings from those who provided comments are summarised below:

- Whilst the guidance was perceived as supporting the sharing of anonymised data, respondents questioned its usefulness compared to receiving data with named service providers (41% of those who provided comments (9)).

- Respondents noted that previously shared SASS data had helped to some extent, but often contained gaps and inaccuracies, such as calculation errors or incorrect language categories. Respondents felt anonymised data was challenging to interpret and made it difficult to identify which settings had not responded and what service gaps existed across counties (55% of those who provided comments (12)).

- Respondents highlighted that the Statutory Guidance and Memorandum of Understanding between Care Inspectorate Wales and Local Authorities allowed for sharing anonymised data, but they suggested a standardised national data-sharing protocol and more user-friendly formats (such as spreadsheets or dashboards) to improve usability and consistency (45% of those who provided comments (10)).

- Respondents raised about the duplication of data collection and the administrative burden on staff, given that Welsh Government already collected significant amounts of information (9% of those who provided comments (2)). There were calls for clearer guidance on which datasets should be used (18% of those who provided comments (4)).

Overall, whilst it was felt the current Statutory Guidance allows for appropriate anonymised sharing of data, there were strong calls for SASS data to be identifiable at the provider level as anonymised data prevented Local Authorities from following up with individual settings to verify or correct inaccuracies, which limited the ability to improve future submissions and cross-reference with other datasets. It was

suggested that Local Authorities could anonymise the data when reporting in their CSA.

Question 24: Do you think the proposed changes to the Regulations will help Local Authorities in assessing sufficient childcare for children with an Additional Learning Need (ALN) and/or disability?

A total of 34 responses were received to this question, as follows:

Answer	Percentage	Number
Yes	50%	17
No	35%	12
Not applicable	9%	3
Comments only provided	6%	2

Out of a total of 34 respondents, 24 provided a wide range of detailed feedback, offering valuable insights irrespective of whether they answered yes, no or not applicable to the question.

Whilst half respondents (50% of respondents (17)) were in agreement that the proposed changes to the regulations will help Local Authorities in assessing sufficient childcare for children with an Additional Learning Need (ALN) and/or disability, the minority (35% of respondents (12)) did not believe this to be the case. Some of the key findings from those who provided comments are summarised below:

- Respondents noted that the range of emerging needs/Additional Learning Needs was broad and not all childminders or childcare providers could guarantee support for every child with specialist needs as it would depend on the child's level of need, available resources, and the needs of other children in their care (25% of those who provided comments (6)).

- Respondents highlighted that children with emerging needs might not have formal recognition (such as an Individual Development Plan) and that current data collection methods may underrepresent actual demand, especially as some needs only become apparent after children enter childcare settings and that it was difficult to collect robust data due to inconsistent understanding of emerging needs/Additional Learning Needs (17% of those who provided comments(4)).

- One respondent raised concerns that the proposed changes to regulations did not sufficiently recognise providers' efforts to adapt provision or the rapid changes in individual needs, with the suggestion that a five-year assessment cycle was too infrequent (4% of those who provided comments).

- One respondent called for strengthened inclusive language, mandatory engagement with families of disabled children, disaggregated data collection, accessibility audits, recognition of additional barriers (such as staffing and transport), and equitable funding assessments. Annual reporting and independent oversight were recommended to monitor progress in meeting the needs of children with a disability/Additional Learning need (4% of those who provided comments).

- One respondent commented that local intelligence and live data, often gathered by teams such as Early Years Additional Needs or Family Information Services, were considered more accurate than CSAs alone (4% of those who provided comments).

- One respondent recommended that the CSA include annual Additional Learning Needs monitoring, closer alignment with the Additional Learning Needs Code and inclusion teams, clearer guidance on inclusive childcare, and improved data-sharing between Welsh Government and local Additional Learning Needs services (4% of those who provided comments).

In summary, respondents felt that it was difficult to capture information in relation to emerging needs, Additional Learning Needs and/or a disability. It was also felt it was difficult for providers to guarantee support for children with an Additional Learning Need/disability as the needs are individual to each child and every child's circumstances and requirements can vary significantly. Suggestions were made as to using other sources of information and clearer guidance to support Local Authorities in collecting information on children with Additional Learning Needs/disability.

Question 25: What support would be useful to assist Local Authorities with engaging with Black, Asian and Minority Ethnic (including Gypsy, Roma and Traveller) communities?

A total number of 30 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations. Some of the key findings are summarised below:

- Respondents noted that Social Care Wales and other partners, such as the Diversity and Anti-Racist Professional Learning organisation (DARPL), could support Local Authorities in developing connections with minority ethnic communities. There was a suggestion to leverage existing networks and partnerships, such as Family Support and Community Officers and education colleagues, to increase engagement and participation (33% of those who provided comments (10)).

- Respondents emphasised the importance of culturally sensitive engagement, including providing information in multiple languages and accessible formats, and ensuring communication was clear and meaningful. They called for the use of translated and easy-read materials, and emphasised the need to address cultural differences in childcare practices (for example, food provision and daily routines). They also stated that employing staff from within the target communities could improve data collection and trust (33% of those who provided comments (10)).

- Respondents highlighted the value of Local Authorities working with third sector organisations, trusted community advocates, and expert reference groups to reach Black, Asian and Minority Ethnic (including Gypsy, Roma and Traveller) communities (20% of those who provided comments (6)).

- Respondents highlighted that Local Authority staff required anti-racism and cultural competence training before engaging meaningfully with these communities. They suggested the use of toolkits and training resources, such as those developed by DARPL and Cwlwm, to support staff and childcare settings in embedding anti-racist practice (17% of those who provided comments (5)).

- Respondents suggested that Local Authorities would benefit from sharing examples of successful engagement with Black, Asian and Minority Ethnic communities, and from targeted support, such as cultural liaison officers or national organisations facilitating contact with local providers (13% of those who provided comments (4)).

- Respondents pointed out that low numbers of target group members and difficulties accessing certain communities (such as Traveller families) presented ongoing challenges for engagement. They observed that parents across all demographics found the childcare system complex, and more needed to be done to simplify processes and communications. They also noted that building trust, allowing time for relationships to develop, and transparency were critical for successful engagement (10% of those who provided comments (3)).

- Respondents pointed out that low numbers of target group members and difficulties accessing certain communities (such as Traveller families) presented ongoing challenges for engagement (10% of those who provided comments (3)).

- Respondents also noted that building trust, allowing time for relationships to develop, and transparency were critical for successful engagement (10% of those who provided comments (3)).

- Respondents suggested that Local Authorities would benefit from sharing examples of successful engagement with Black, Asian and Minority Ethnic communities, and from targeted support, such as cultural liaison officers or national organisations facilitating contact with local providers (7% of those who provided comments (2)).

- Respondents recommended engaging with people with lived experience to ensure their voices influenced childcare planning and provision (7% of those who provided comments (2)).

- One Respondent felt that Local Authorities needed clear guidance on collecting and using data about ethnicity and cultural background in a respectful and meaningful way (3% of those who provided comments).

- One respondent observed that parents across all demographics found the childcare system complex, and more needed to be done to simplify processes and communications (3% of those who provided comments).

Question 26: What information or data do childcare representative organisations hold that could be useful in meeting the Regulatory requirements of the CSA?

A total of 29 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations. Some of the key findings are summarised below:

- Respondents noted that childcare representative organisations regularly collected information about workforce trends including training uptake, staff qualifications, recruitment and retention challenges, emerging pressures on providers, and children with emerging needs/Additional Learning Needs. One respondent (3%) referenced a pilot Early Years and Childcare workforce survey by Social Care Wales which could support Local Authorities in meeting regulatory requirements (14% of those who provided comments (4)).

- Respondents observed that representative organisations had a strong understanding of sector issues and could provide timely sector intelligence, particularly for their specialisms (e.g., Welsh-medium, full day care, or out-of-school settings). They highlighted the organisations' ability to gather qualitative data, such as emerging issues, barriers not captured in standard

questionnaires, and anecdotal evidence which could be useful for the CSA (10% of those who provided comments (3)).

- Respondents stated that childcare representative organisations generally held similar information to that already held by or accessible to Local Authorities or Care Inspectorate Wales (7% of those who provided comments (2)).

- Respondents noted childcare representative organisations only held data on their own members and that participation in data collection was voluntary and would not provide full coverage, leading to incomplete datasets. It was also mentioned that GDPR regulations limited the sharing of some data with Local Authorities (7% of those who provided comments (2)).

- One respondent stated that childcare representative organisations were helpful in supporting the distribution and completion of questionnaires, and encouraging provider participation to improve data quality for Local Authorities (3% of those who provided comments). Another respondent felt that multiple surveys and data requests led to unnecessary duplication and administrative burden for both providers and Local Authorities (3% of those who provided comments).

- One respondent requested clearer guidance from the Welsh Government to national childcare and play representative bodies regarding information sharing practices and expectations (3% of those who provided comments).

Question 27: We would like to know your views on the effects that the Review of the Childcare Sufficiency Assessment (CSA) Duty on Local Authorities would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

A total of 21 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations. Some of the key findings are summarised below:

- A minority of respondents recommended clearer guidance on measuring and planning for Welsh-medium provision, greater consistency in terminology, and embedding Welsh language planning at all stages of the CSA process. Collaboration with organisations such as CWLWM and Mudiad Meithrin was seen as valuable for improving the quality of data, workforce development, and parental engagement (24% of those who provided comments (5)).

- Respondents felt that revised frameworks requiring Local Authorities to assess demand for Welsh-medium childcare would help identify unmet needs and support the aims of Cymraeg 2050 (14% of those who provided comments (3)).

- A few respondents referred to Welsh Language definitions. Concerns were raised over inconsistent and unclear definitions of 'Welsh-medium' and 'bilingual' placements, which was felt could lead to confusion for both providers and parents. They felt that simplifying and aligning language categories with those used in education would improve clarity and reporting accuracy (14% of those who provided comments (3)).

- Respondents noted that challenges remained in accurately capturing demand for Welsh-medium childcare, and felt current methods often underreport true interest due to limited awareness and availability (10% of those who provided comments (2)).

- One respondent felt it was important for children who spoke Welsh to have opportunities to use the language and believed basic Welsh should be integrated into all settings. They acknowledged that in some parts of Wales, providing Welsh-speaking staff or encouraging children to learn Welsh remained challenging due to low numbers of speakers (5% of those who provided comments).

- One respondent supported making all promotional materials and information for providers bilingual, as well as signposting to Welsh language training and working with national childcare and play representative bodies to promote usage. They highlighted ongoing initiatives to upskill the workforce and the importance of supporting current staff to develop Welsh language skills. However, one respondent (5%) considered resource limitations and a shortage of Welsh-speaking staff as barriers to expanding Welsh-medium childcare without additional support and funding (5% of those who provided comments).

- One respondent noted concerns about settings overstating their Welsh language provision, sometimes influenced by external pressures like inspection focus or funding criteria. It was felt that the language used in reporting and data collection tools was inconsistent between different organisations. One respondent saw the need for more consistent and transparent monitoring, including using proxy measures such as school admissions and service enquiries (5% of those who provided comments).

Question 28: Please also explain how you believe the proposed review could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

A total number of 18 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations. Some of the key findings are summarised below:

- Respondents referred to the childcare workforce. It was highlighted that a sustainable Welsh-medium childcare sector depended on a skilled workforce. They recommended that Local Authorities develop recruitment and retention strategies in partnership with organisations such as Mudiad Meithrin and training providers. It was suggested that guidance could promote workforce development to expand Welsh-medium capacity (17% of those who provided comments (3)).

- One respondent felt that Local Authorities needed to provide ongoing support to settings in understanding the importance of using and promoting Welsh, and to offer opportunities for staff to further develop their Welsh language skills. They noted the importance of encouraging the use of the Welsh language in communication with children and families (6% of those who provided comments).

- One respondent noted that Welsh versions of documents sometimes used more formal language than their English counterparts, making them harder to understand. Respondents highlighted the need for parental forms and surveys to use familiar terms, and for translations to maintain a consistent, user-friendly flow in both languages, to prevent users defaulting to English (6% of those who provided comments).

- One respondent felt that the Welsh language should not be treated less favourably than English in the CSA process. They wanted Local Authorities to ensure bilingual communication, equal visibility of Welsh-medium services, thus removing barriers for Welsh-speaking families. It was suggested that guidance should require Local Authorities to be proactive in promoting and planning for Welsh-medium childcare, rather than solely responding to expressed demand. It was felt that Local Authorities should anticipate needs and plan for future provision, including in areas with little current Welsh-medium childcare (6% of those who provided comments).

- One respondent noted inconsistency between Welsh language definitions used for childcare and schools, and suggested that definitions for Welsh-medium and bilingual provision should be clarified and standardised across CSA, Care Inspectorate Wales, and education (6% of those who provided comments).

Question 29: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

A total of 9 respondents provided comments in relation to this question. Respondents provided a wide range of detailed feedback, offering valuable insights which will be useful in supporting the implementation of the regulations. Some of the key findings are summarised below:

- Respondents referred to children with emerging needs/Additional Learning Needs and disabilities and indicated that, while helping to map services for children with emerging needs/Additional Learning Needs and disabilities, amendments to the CSA process did not guarantee improved provision. They called for more specific guidance on action plans. More guidance was called for on how CSAs support smooth, equitable transitions from childcare into early education, especially for learners with ALN and those accessing Welsh-medium provision (22% of those who provided comments (2)).

- Respondents referred to costs which included funding support to help Local Authorities in completing the CSA and cost-saving measures, such as Welsh Government analysing parent survey data and sharing it with each Local Authority, and Welsh Government analysing and distributing SASS data to Local Authorities. They also recommended a shorter, more focused CSA template to reduce translation and reporting costs, with these savings recurring every five years (22% of those who provided comments (2)).

- One respondent noted that although the CSA consultation stressed the need to streamline and focus the CSA, it was felt the draft revised regulations did not fully reflect these priorities. They expressed concern that proposed measures such as increased use of focus groups and mapping of unregistered childcare provision could be resource-intensive. It was suggested that while providing standardised data sets, proxy measures, and cleansed SASS data might reduce administrative burdens, these actions alone were unlikely to result in significant improvements to the CSA process (11% of those who provided comments).

- One respondent raised concerns about workforce planning, particularly the importance of Welsh language skills in early years and childcare. They highlighted the need for adequate training schemes, noting that centralisation of 14–19 education by Local Authorities and a decline in Welsh-medium childcare courses could impact the sector's ability to meet demand for qualified bilingual staff (11% of those who provided comments).

- One respondent suggested that further consideration is required on linking CSA planning to educational outcomes and greater emphasis on the use of inspection evidence (such as Estyn and Care Inspectorate Wales), improved

digital infrastructure, and more robust monitoring of inclusion and the impact of CSA actions on under-represented groups (11% of those who provided comments).

Question 30: Do you live in Wales?

A total number of 13 respondents answered this question as follows:

Answer	Percentage	Number
Yes	92%	12
No	8%	1

Question 31: Do you have a business interest in Wales?

A total number of 10 respondents answered this question as follows:

Answer	Percentage	Number
Yes	30%	3
No	70%	7

4. Summary of Responses for Questions Aimed at Parents/Carers

22 responses were received to the questions aimed at parents/carers. Not all respondents answered every question. A summary of the responses received to the questions put forward within the consultation and key findings from the comments are provided below.

Question 1: Have you been involved in providing feedback as part of the CSA consultation undertaken by your Local Authority?

All 22 respondents answered this question as follows:

Answer	Percentage	Number
Yes	9%	2
No	91%	20

The majority (91% of respondents (20)) indicated they had not previously been involved in providing feedback as part of the CSA consultation undertaken by their Local Authority. Whereas the minority (9% of respondents (2)) had not been previously involved in providing feedback as part of the CSA consultation.

Out of a total of 22 responses, 6 respondents provided comments in relation to this question. Some of the key findings from those who provided comments are summarised below:

- Respondents had been asked by e-mail from the Local Authority to be involved in the CSA consultation (33% of those who provided comments (2)).

- Respondents highlighted that the Local Authority had not previously provided opportunities for engagement or participation in consultations and felt it would be helpful if consultation opportunities were more widely advertised and accessible to parents and families so that more voices can be heard (33% of those who provided comments (2)).

- One respondent indicated that they had recently relocated to Wales and were not previously aware of other consultations (17% of those who provided comments).

- One respondent requested that the insights shared as part of the consultation are considered across the whole of Wales (17% of those who provided comments).

Overall, the majority of respondents had not previously been involved in providing feedback to the Local Authority on the CSA consultation with only two being asked to provide feedback via e-mail.

Question 2: What information do you think is useful to support you when looking for childcare?

22 respondents answered this question. Some of the key findings are summarised below:

- Respondents highlighted the importance of up-to-date, easily accessible information from Local Authorities on childcare availability, including vacancies, locations, types of provision (such as wraparound and Welsh-medium settings), and specialist services for children with emerging

needs/Additional Learning Needs (50% of those who provided comments (11)).

- Respondents called for cost transparency, including fees, discounts, Government-funded support, and any additional financial help (for example, Flying Start or the Childcare Offer for Wales), was mentioned as being important for families to make informed decisions and understand the impact on their finances (45% of those who provided comments (10)).

- Respondents emphasised the need for clear details regarding staff qualifications, ratios, experience, background checks (including Disclosure and Barring Service checks), and inspection reports (such as Estyn and Care Inspectorate Wales reports), as well as genuine reviews and testimonials from parents (41% of those who provided comments (9)).

- Respondents expressed concerns about the accessibility of providers, particularly for families without cars or established support networks, and about the flexibility of childcare hours to accommodate shift workers and varying schedules (27% of those who provided comments (6)).

- Respondents referred to the safety, nurturing environment, hygiene standards, healthy meals, and quality of activities (including opportunities for children's self-expression, social-emotional development, and extra-curricular options) and saw these as key factors in choosing a setting (23% of those who provided comments (5)).

- Respondents valued practical guidance on the process of applying for childcare and financial support, preferring simple, clear explanations such as infographics to clarify the steps involved (23% of those who provided comments (5)).

- One respondent reported challenges in finding suitable, well-informed provision for families with children who are neurodivergent or have additional needs and requested better directories and guidance from Local Authorities (5% of those who provided comments).

Question 3: What type of childcare would you be most inclined to use based on your children's ages?

A total number of 22 respondents answered this question. Some of the key findings are summarised below:

- Respondents noted that more childcare facilities linked to schools would be beneficial (41% of those who provided comments (9)), with one respondent mentioning this particularly for children with emerging needs/Additional

Learning Needs, as this would reduce transitions and provide a familiar environment (5% of those who provided comments).

- Respondents mentioned wraparound care and Cylch Meithrin as preferred options, alongside day nurseries, private nurseries, creches, childminders, and babysitters. Concerns were raised about the limited and expensive nature of private nursery offers, with wraparound facilities not available at all schools (32% of those who provided comments (7)).

- Respondents felt there was a need for after-school care and holiday clubs, with some families seeking providers who could offer school pick-ups, though such services were not widely available (18% of those who provided comments (4)).

- Respondents highlighted a lack of childcare provision for children with emerging needs/Additional Learning Needs, expressing concern that suitable options were virtually non-existent and questioning the reasons for this gap (9% of those who provided comments (2)).

- Respondents emphasised that existing childcare hours were unsuitable for working parents, particularly those needing full-day care (9% of those who provided comments (2)).

- One respondent reported frustration with eligibility criteria for certain local authority-run schemes such as 'rising threes', feeling that children born outside specific months missed out on valuable opportunities for social development (5% of those who provided comments).

- One respondent expressed a preference for childcare that balanced safety, emotional wellbeing, and opportunities for play and personal growth, rather than focusing solely on structured learning or extended school hours (5% of those who provided comments).

- One respondent suggested that families would benefit from being better informed about the different childcare options available in their local area, enabling them to make more suitable decisions based on their circumstances (5% of those who provided comments).

Question 4: How can the proposed changes to the Regulations and Statutory Guidance be developed to improve, or reduce any negative effects on children's rights?

A total of 15 respondents provided comments in relation to this question. Some of the key findings are summarised below:

- Respondents noted the importance of making childcare affordable and inclusive, stressing the need for options that support working parents, especially those on zero-hours contracts or in temporary roles. Comparisons were made with England, with some calling for equal rights such as government funded childcare from nine months of age, arguing that greater support would enable more parents to work (33% of those who provided comments (5)).

- Respondents felt regulations should go further to protect children's rights – including safety, inclusion for all (especially children with disabilities, emerging needs/additional learning needs, or from minority backgrounds), and ensuring children's voices were heard (20% of those who provided comments (3)).

- Respondents suggested that Local Authorities should provide comprehensive information on all types of childcare provision, including Welsh-medium, bilingual, English-medium, and provision suitable for children with disabilities or special educational needs, reflecting Article 30 of the United Nations Convention on the Rights of the Child (20% of those who provided comments (3)).

- Respondents highlighted that demand for Welsh wraparound childcare, particularly for part-time nursery children, had been underestimated and that available spaces were often insufficient (13% of those who provided comments (2)).

- Respondents expressed concern about the lack of early years or childcare placements, describing the situation as inadequate and disappointing, given children's rights to education and care (13% of those who provided comments (2)).

- One respondent raised concern about the quality of meals provided in childcare settings, with complaints about unhealthy and overpriced food options (7% of those who provided comments).

- One respondent recommended that Local Authorities consult with the Armed Forces community in areas with a military presence, to ensure the needs of Service Children were considered, in line with Article 3 of the UNCRC (7% of those who provided comments).

Question 5: We would like to know your views on the effects that the Review of the Childcare Sufficiency Assessment (CSA) Duty on Local Authorities would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

A total number of 11 respondents answered this question. Key findings are summarised below:

- Respondents felt that promoting the Welsh language through childcare could have positive effects, such as helping more children become bilingual, benefiting their identity, culture, and future opportunities (27% of those who provided comments (3)).

- Some respondents were not able to speak Welsh and noted that families, especially non-Welsh speakers, would need support to understand and use Welsh, and that this could place additional pressure on teachers and staff (27% of those who provided comments (3)).

- Respondents expressed the view that children struggled with English language skills and should prioritise learning English before being encouraged to learn Welsh or another language (18% those who provided comments (2)).

- Respondents felt there were other more pressing issues such as access to and availability of places rather than focus on Welsh language (18% of those who provided comments (2)).

- One respondent believed that to maximise positive effects, regulations should require Local Authorities to consistently collect data on Welsh-medium provision, identify gaps, and develop action plans to increase Welsh-language childcare where needed. They raised concerns that if Welsh-medium provision were treated as optional, it could result in unequal access depending on where families lived (7% of those who provided comments).

Question 6: Please also explain how you believe the proposed review could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

A total number of 5 respondents answered this question. Some of the key findings are summarised below.

- One respondent believed it was unrealistic to expect the Welsh language to be treated equally to English, and noted that significant funds were being spent despite a perception that it was not widely wanted in Wales (20% of those who provided comments).

- One respondent felt Local Authorities could improve their approach by: collecting better data on demand for Welsh-medium childcare, not just current availability; developing targeted action plans to expand Welsh-medium childcare where provision was lacking; engaging directly with parents interested in raising bilingual children to ensure their needs were considered; and focusing on staff recruitment and training to ensure enough qualified Welsh-speaking childcare workers were available. They felt these steps would help ensure Welsh was not treated less favourably than English, providing more children with genuine opportunities to learn and use Welsh from an early age, and supporting the normalisation of bilingualism across Wales (20% of those who provided comments).

- One respondent expressed that, when done appropriately, Welsh-medium childcare could give children additional advantages in education and future opportunities (20% of those who provided comments).

- One respondent raised concerns that in some Welsh nurseries, staff did not actually speak Welsh to the children, despite the setting being designated as Welsh-medium (20% of those who provided comments).

- One respondent felt there were other more pressing issues such as access to and availability of places rather than focus on Welsh language (20% of those who provided comments).

Question 7: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

A total number of 6 respondents made some additional comments. Some of the key findings are summarised below:

- Respondents raised concerns about unequal access to childcare funding, noting that families in England received greater financial support compared to those in Wales. Many called for the Welsh Government to make funding more affordable and equitable, in line with England (67% of those who provided comments (4)).

- Respondents emphasised the need for childcare to offer safe, nurturing environments that supported children's emotional, social, and creative development, not solely academic preparation and saw the wellbeing and resilience of children as priorities. Some highlighted how current funding and support arrangements made it difficult for working parents, particularly those without family nearby or those in specialised professions, to return to work due to high childcare costs (33% of those who provided comments (2)).

- Respondents expressed concerns about the quality of childcare, specifically regarding children's health (e.g., provision of balanced meals versus cheap snacks) and safety (such as secure facilities and appropriate staff supervision) (33% of those who provided comments (2)).

- Respondents noted that the current system tended to favour families claiming benefits, rather than supporting working parents, and expressed a desire for childcare provision to encourage a strong work ethic in children (33% of those who provided comments (2)).

- One respondent called for children's voices to be included in assessments, such as collecting feedback from older children about their childcare experiences, to ensure services remained child-centred (17% of those who provided comments).

- One respondent criticised the rigidity of funded hours for two-year-olds, with a request for greater flexibility to accommodate the needs of working parents, rather than fixed schedules determined by nurseries (17% of those who provided comments).

- One respondent was frustrated about the lack of after-school childcare provision, especially for activities such as after school clubs, as neither schools nor Local Authorities were seen to address this need adequately (17% of those who provided comments).

Question 8: Do you live in Wales?

A total number of 22 respondents answered this question as follows:

Answer	Percentage	Number
Yes	95%	21
No	5%	1

Question 9: Do you have a business interest in Wales?

A total number of 21 respondents answered this question as follows:

Answer	Percentage	Number
Yes	14%	3
No	86%	18

5. Summary of Responses Primarily Aimed at Childcare Providers

Three responses were received to the questions aimed at childcare providers. Not all respondents answered every question. A summary of the responses received to the questions put forward within the consultation and key findings from the comments are provided below.

Question 1: Have you been involved in providing feedback as part of the CSA consultation undertaken by your Local Authority?

All three respondents answered this question as follows:

Answer	Percentage	Number
Yes	67%	2
No	33%	1

All 3 respondents made some additional comments. The key findings are summarised below:

- One respondent felt that information from childcare providers is ignored (33% of those who provided comments).

- One respondent described the process as being fairly straightforward (33% of those who provided comments).

- One respondent highlighted that this was the first time they been asked to contribute (33% of those who provided comments).

Question 2: What information do you think would be useful to include in the CSA to support you in establishing/developing your childcare business?

All three respondents answered this question. The key findings are summarised below:

- One respondent suggested including what real funding would look like; what support childcare providers need; what training do childcare providers want;

and what colleges should be teaching students (33% of those who provided comments).

- One respondent called for more varied, relevant training for practitioners and more opportunities to network with other local providers in order to boost the profile of homebased childcare (33% of those who provided comments).

- One respondent suggested a removal of the use of '30 hours' as they did not think this was a true reflection of what parents/carers can come to expect when their child is of age and receive the 17.5 hours per week of help with funding (33% of those who provided comments).

Question 3: How can the proposed changes to the Regulations and Statutory Guidance be developed to improve, or reduce any negative effects on children's rights?

There were no responses to this question.

Question 4: We would like to know your views on the effects that the Review of the Childcare Sufficiency Assessment (CSA) Duty on Local Authorities would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

All three respondents answered this question. The key findings are summarised below:

- One respondent felt that the push on the Welsh language is a waste of tax payer's money causing a duplication in documents and lengthy phone messages. They felt that Welsh would be of no use for those with a focus on global jobs and that heritage was being forced on people instead of finding ways of encouraging people to want to learn about the language (33% of those who provided comments).

- One respondent felt that Welsh and English are treated equally in their Local Authority and felt that more support for childminders learning Welsh to use their language skills with the children in their care would be useful with Local Authorities leading the way on this (33% of those who provided comments).

- One respondent felt that a big increase of the Welsh language is needed. They felt that since the turn of 2010, Wales has seen a huge surge in communities using the Welsh language as a preferred method of

communication and Welsh is treated no less than English (33% of those who provided comments).

Question 5: Please also explain how you believe the proposed review could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

All three respondents answered this question. The key findings are summarised below:

- One respondent asked what opportunities learning Welsh actually led to and felt that children should be taught a range of languages for them to choose which one they want to use. They also felt that funding provided for Welsh schools/nurseries has resulted in English language provisions struggling (33% of those who provided comments).

- One respondent felt that Local Authorities should create regular events/forums for childcare providers which could include a focus on Welsh language skills and to develop new skills. The respondent also felt there are local training providers that could run training for childcare settings and demonstrate how play, loose parts, art, physical literacy, music etc can be introduced to the children through the medium of Welsh (33% of those who provided comments).

- One respondent felt Welsh should be treated across all provisions in the same light as English to ensure future generations have the ability to speak Welsh which in turn increases their chances of a prosperous future, and the opening of doors to further their careers (33% of those who provided comments).

Question 6: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

One respondent answered this question and highlighted that they felt that the Flying Start childcare offer for two year olds needs to be renamed to prevent it being mixed up with the full Flying Start offer and that other elements of Flying Start should be considered as it was not attracting people to sign up (100% of those who provided comments).

Question 7: Do you live in Wales?

All three respondents answered this question as follows:

Answer	Percentage	Number
Yes	100%	3
No	0%	0

Question 8: Do you have a business interest in Wales?

All three respondents answered this question as follows:

Answer	Percentage	Number
Yes	67%	3
No	33%	1

6. Welsh Government's Response

Welsh Government will continue to work with the CSA Working Group that was established to oversee and progress the CSA review with representatives from a range of stakeholders who have an interest in CSAs. The findings of the consultation will inform what revisions need to be made to the draft revised Regulations; the draft Regulatory Impact Assessment; the draft Integrated Impact Assessment; and the Statutory Guidance in light of the comments received.

Welsh Government will also continue to work with the Data Sub Group which was established to consider ways in which Welsh Government can assist Local Authorities in undertaking the CSA and to ensure the data captured is relevant and useful for Local Authorities to use in local planning and decision making. The comments received from the consultation will help inform what information Welsh Government can provide to Local Authorities to assist them in undertaking the CSA.