



Department
for Education

Consultation response form

Consultation closing date: 10 December 2015

Your comments must reach us by that date

**Amendments to the Paediatric First Aid
requirements in the Statutory Framework
for the Early Years Foundation Stage
(EYFS)**

Please respond online if possible using the following link:

<https://www.education.gov.uk/consultations>

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department.

The department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.	<input type="checkbox"/>
Reason for confidentiality:	
Name: Susanna Kalitowski	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of organisation (if applicable): Professional Association for Childcare and Early Years (PACEY)	

Address:

Northside House
Third Floor
69 Tweedy Road
Bromley
Kent
BR1 3WA

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by email: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the department's ['Contact us'](#) page.

Please mark the box that best describes you as a respondent. If 'Other' please specify in the box below.

<input type="checkbox"/> Local authority	<input type="checkbox"/> Childminder	<input type="checkbox"/> Parent/Carer
<input type="checkbox"/> Private/voluntary provider full day care	<input type="checkbox"/> Independent school	<input checked="" type="checkbox"/> Childcare or early years organisation
<input type="checkbox"/> Private/voluntary provider sessional	<input type="checkbox"/> Primary school with nursery or reception class	<input type="checkbox"/> Maintained nursery school
<input type="checkbox"/> Holiday provider, Before/After school club	<input type="checkbox"/> FE childcare training provider	<input type="checkbox"/> First aid training provider
<input type="checkbox"/> Health professional	<input type="checkbox"/> Academic	<input type="checkbox"/> Other*

*Please specify:

Current EYFS requirements:

1. Do the current requirements in the EYFS on paediatric first aid need to be changed/strengthened?

Yes

No

Comments:

PACEY agrees that the requirements in the EYFS relating to paediatric first aid should be strengthened, and that additional early years staff should be required to be first aid trained.

Ideally, all staff who are left unsupervised with children for any period of time in any type of early years setting should be required to hold a current Paediatric First Aid (PFA) certificate.

This is already the case in childminding settings, where childminders and all childminding assistants must hold a full PFA certificate. Childminders overwhelmingly support existing first aid requirements and have not found them to be unduly burdensome. A recent member survey found that 94% of PACEY members were in favour of more first aid trained staff in group settings.

On the proposed training requirement in the early years foundation stage (EYFS):

2. Do you agree with the proposal that, in addition to the voluntary quality assurance scheme, the government should introduce a mandatory requirement for newly qualified early years staff (with full and relevant level 2 or level 3 childcare qualification) to also hold a current Paediatric First Aid (PFA) or emergency PFA certificate in order to be included in the required staff: child ratios in an early years setting?

Yes

No

Comments:

PACEY agrees that, at a minimum, newly qualified early years staff with a full and relevant level 2 or level 3 childcare qualification should be required to hold a current Paediatric First Aid (PFA) certificate in order to be included in the required staff: child ratios. However, we think that the proposal should go further, and that a full PFA certificate should be required. An emergency PFA certificate should not be deemed an acceptable substitute.

In addition, we think settings should be required to ensure within a reasonable amount of time that all staff who are included in the ratios, not just newly qualified staff, are in possession of a full PFA certificate.

3. Do you agree that the benefits of the proposals laid out in this consultation justify the additional costs to childcare providers? Do you have any views on the impact assessment of our proposals?

Yes

No

Comments:

PACEY believes that the benefits of these proposals far outweigh the additional costs to childcare providers, which are far from prohibitive. The Millie Thompson case brings into sharp focus the fact that paediatric first aid training can mean the difference between the life and death of a child. PACEY currently offers a full PFA certificate to members for £84. This is not a huge amount for providers to pay every three years for a potentially life-saving measure.

4. Do you agree this proposal should come into force from 1 September 2016, for staff who have completed their L2 or L3 childcare qualification after 30 June 2016? If not, please suggest an alternative date.

Yes

No

Comments:

PACEY is in support of this proposal coming into force as soon as possible. A full PFA certificate takes only 12 hours to complete, and it is not unreasonable to require staff to undertake it as soon as is reasonably practicable.

5. Should newly qualified members of staff with a level 2 or level 3 qualification be allowed a three month 'grace' period to complete PFA training after starting work with a new employer?

Yes

No

Comments:

On balance we do not believe a grace period is necessary. A full PFA certificate takes only 12 hours to complete and employers should be incentivised to ensure staff have undergone training as soon as possible.

On the content of emergency paediatric first aid courses:

6. Do you agree with the course content for a one-day emergency PFA certificate? Should any other subjects be added or taken away from the suggested course content?

Yes

No

Comments:

We do not agree with the overall concept of an emergency PFA certificate, which serves to create a two-tier system of first-aid training. If an emergency certificate is an acceptable alternative, what motivation is there for employers to require staff to undergo the full training? First-aid training should be uniformly rigorous and of a high standard to maintain quality and ultimately save lives. A full PFA certificate takes only 12 hours (or roughly two days) to complete and does not cost a large amount. Childminders and their assistants must hold a full first-aid certificate from day one; the same should be true of other early years practitioners.

On Equal Opportunities:

7. Should any exceptions be made on equal opportunities grounds to new staff with a disability that would allow them to be included in the adult:child ratios without a PFA or emergency PFA certificate, provided that the EYFS requirements are otherwise met?

Yes

No

Comments:

There is arguably a case that an exception should be made on equal opportunities grounds in extremely limited cases where a disabled staff member is physically unable to carry out the training and cannot perform the necessary procedures. However, these staff members should still be required to undergo some kind of basic first-aid training. The exception would have to be clearly defined to ensure it is not misused by providers.

Displaying staff certificates

8. Should early years providers be encouraged to display (or make available) staff PFA certificates in order to make it clear to parents how many and which staff are trained

Yes

No

Comments:

Many childcare providers already display their first-aid certificate along with their Ofsted registration certificate, and we cannot see why most providers would not want to do so. More does need to be done to educate parents on the importance of first-aid training. For example, parents should be actively encouraged to ask their early years providers what proportion of staff members are first-aid trained.

9. Do you have any other comments or suggestions on the proposals set out in this consultation?

Comments:

At the moment, PACEY is concerned by the fact that paediatric first aid does not sit clearly within the remit of any regulatory authority, for example the Health and Safety Executive (HSE) or Ofsted. Early years providers are required to demonstrate to Ofsted during the course of their inspection that they have met the requisite first aid requirements. However, as Ofsted does not have responsibility for - or even particular expertise in - paediatric first-aid, it is difficult for inspectors to effectively verify that adequate training was actually undertaken. We recommend that responsibility for paediatric first aid be given to a regulatory body, preferably the Health and Safety Executive. This body should liaise with Ofsted on how to effectively ensure that paediatric first aid requirements are being met.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply.

X

Email address for acknowledgement: susanna.kalitowski@pacey.org.uk

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [consultation principles](#).

The key consultation principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the compact between government and the voluntary and community sector will continue to be respected.

Completed responses should be sent by 10 December 2015

Consultation responses can be completed online at:
www.education.gov.uk/consultations

or by downloading a response form which should be completed and sent

by email to: Consultation.PFA@education.gsi.gov.uk

or by post to:

Paul Oates
Childcare Providers and Regulation
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

If you have any comments on how DfE consultations are conducted, please contact Rauf Koleoso, DfE Consultation Co-ordinator

Telephone: 0370 000 2288

Email: Consultation.UNIT@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.