

## **Paediatric First Aid (PFA) in early years' provision**

### **Department for Education**

**RPC rating: Fit for purpose**

#### **Description of proposal**

The current Early Years Foundation Stage requirements are that at least one person who has a current paediatric first aid (PFA) certificate must be on the premises and available at all times when children are present, and must accompany children on outings. The IA explains that paediatric first aid training must be appropriate for workers caring for young children and, where relevant, babies. Providers should take into account the number of children, staff and layout of premises to ensure that a paediatric first aider is able to respond to emergencies quickly.

The Department proposes to embed PFA training in the qualification requirements of new child carers. The Department's IA includes a range of options, from a voluntary quality mark scheme only to requiring all childcare staff to have PFA training. The preferred option is a quality mark scheme and a regulatory requirement that newly qualified early years staff have a PFA or emergency first aid certificate before they can be included in adult: child ratios. The proposal is a response to a coroner's recommendation, a 103,000 signature petition, a subsequent parliamentary debate and a national review, following a tragic incident in a nursery class. The Department states that "*the national review has shown that parents would welcome additional reassurance that their children are safe through increased paediatric first aid provision*". The Department has considered a range of regulatory and non-regulatory options, all of which retain or go beyond existing requirements.

#### **Impacts of proposal**

The proposal requires newly qualified early years staff to have a paediatric or emergency first aid certificate before they can be included in the required adult-child ratios in early years' settings. This will involve a training cost to business, both through the course fees payable and the time spent by staff on the training. The Department estimates an equivalent annual net cost to business (EANCB) of £2.4 million. This is based on estimates that 25,000 private and voluntary sector providers will be affected by the proposal. Using staff turnover rates, the Department estimates that nearly 14,000 new entrants will be recruited into these providers each year. Based on information from training providers and childcare sector organisations, it is assumed that one day's training is required at an average cost of £100. Adding in the opportunity cost of staff time increases the cost to between £165 and £184 per new recruit.

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## Quality of submission

The Department has addressed satisfactorily the comments in the Committee's previous opinion, dated 12 May 2015, through two key changes to the IA:

### 1. Benefits of the proposal

The Department has now provided a detailed assessment of the available data on the number of accidents in childcare settings. The Department provides evidence that PFA training can help prevent accidents (e.g. through improved safety awareness) as well as improve the response to accidents. Although it is not possible to assess how many accidents will be avoided or prevented from becoming more serious by the proposal, the Department does provide a break-even analysis. This uses estimates of the healthcare and wider costs of accidents affecting children that occur in the home. On this basis, the annual costs are equivalent to preventing 1,020 minor accidents or 75 serious accidents. The Department intends to use the consultation to strengthen its assessment of possible health and safety benefits. The final stage IA should also provide a more explicit assessment of how likely the break-even scenarios are.

### 2. Small and micro business assessment (SaMBA)

The Department has provided a much fuller small and micro business assessment. This now includes a breakdown of nurseries and pre-school/playgroups by number of staff. This shows that nearly half of all nurseries have 10 or fewer staff and only 15% had more than 20 members of staff. The Department explains, therefore, that it would not be possible to achieve the policy objective if it exempted small and micro businesses. It also provides an assessment of the proportionality of the impact on these businesses and addresses the issue of possible mitigation. The SaMBA is now sufficient.

### Other comments

In the break-even analysis (paragraphs 23-24), the Department provides a separate comparison according to whether injuries averted are relatively minor or more serious. The impact assessment could be improved by providing a comparison against a combination of injuries of differing severity. This could be informed by information on the relative frequency of each type of injury or through "accident triangles", as used by the Health and Safety Executive.

The Department assumes (paragraph 4.2) that the cost of modifying existing training to meet the new PFA requirements will be absorbed by (public sector) training providers rather than the childcare settings or individuals. As indicated in the impact assessment, this assumption will need to be tested during the consultation to provide assurance that this cost will not also be borne by private and voluntary sector employers.

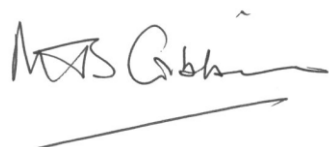
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### Initial departmental assessment

Classification	IN
Equivalent annual net cost to business (EANCB)	£2.4 million
Business net present value	-£27.5 million
Societal net present value	-£29.8 million (benefits not quantified)

### RPC assessment

Classification	IN
Small and micro business assessment	Sufficient



**Michael Gibbons CBE**, Chairman