

# **Evaluation of Early Rollout of 30 Hours Free Childcare**

**Research brief** 

August 2017

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## Introduction

The Free Early Education Entitlement currently offers 15 hours of early education for 38 weeks each year to all three and four year old children and the most disadvantaged two year olds in England. This universal offer for three and four year olds was extended to 30 hours for children of working parents<sup>1</sup> in September 2017 with the national rollout of 30 hours free childcare. While the universal entitlement is focused on supporting child development, the aim of this extension is that "Additional free childcare will help families by reducing the cost of childcare and will support parents into work or to work more hours should they wish to do so".<sup>2</sup>

Early rollout of 30 hours free childcare began in four Local Authorities (LAs) in April 2017 with an offer of extended hours places to all eligible children in each LA. The focus of the early rollout was to test sufficiency of delivery and take-up by eligible parents and whether there were any early indications of impacts on childcare use or parental work. It followed two earlier programmes. First, early implementation began in eight LAs in September 2016 with a universal offer to all eligible children in one LA and a rationed offer in the other seven LAs and aimed to test sufficiency in the delivery of places and maximising parental take-up, as well as trial a range of approaches and models to help improve efficiency, flexibility and capacity in childcare provision. Second, the early innovators programme was introduced in April 2016 in 32 LAs (including the 8 early implementer LAs) which did not offer any extended hours places but provided funding for LAs to explore innovative approaches to support the national rollout of the 30 hours free childcare.

This report presents the findings from an independent evaluation of the early rollout undertaken by Frontier Economics, NatCen Social Research and researchers from the University of East London. It is the second report from a broader evaluation of all three "early" programmes, following a report on the early implementer and early innovator programmes published in July 2017<sup>3</sup>. The evaluation of the early rollout aimed to build on the findings from the initial evaluation report and provide further evidence on:

- What challenged and what facilitated the delivery of 30 hours free childcare?
- How did childcare providers respond? Were sufficient places delivered?

<sup>&</sup>lt;sup>1</sup> Working parents are defined as those who earn or expect to earn the equivalent to working 16 hours each week at the national minimum or living wage. This currently equates to earnings of £115.20 a week (or around £6,000 per year) for parents aged 25 or older.

<sup>&</sup>lt;sup>2</sup> Department for Education (2015), *Childcare Bill: policy statement*, DFE-00177-2015, December, <u>https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/482517/Childcare\_Bill\_Policy\_Statement\_12.03.2015.pdf</u>, page 4.

<sup>&</sup>lt;sup>3</sup> Paull, G. and La Valle, I. with Speight, S., Jones, H. and White, C., (2017), *Evaluation of Early Implementation of 30 Hours Free Childcare*, Department for Education Research Report DFE-RR708, July <u>https://www.gov.uk/government/publications/30-hours-free-childcare-early-implementation-evaluation</u>

• How did parents respond? What were their experiences of using the extended free hours?

In order to answer these questions, a range of quantitative and qualitative evidence was collected using:

- Data collected from each of the four LAs on registered childcare providers, parent applications for the extended hours and headcount data on the use of places.
- In-depth case studies with each of the four LAs undertaking early rollout.
- A large-scale survey with all registered providers in the four LAs.

The learning from the early rollout added to that from early implementation in several important ways:

- Early rollout involved complete implementation in all four LAs whereas early implementation involved only partial implementation in seven of the eight LAs. This provided a stronger test than early implementation of sufficiency of delivery and take-up by parents.
- Early rollout began in April at the start of the school summer term when spare capacity in provision is at its lowest point across the year whereas early implementation began at the most favourable time of year at the start of the school year when spare capacity is at its highest level.
- The four LAs undertaking early rollout were selected to reflect different delivery challenges and local contexts in which to test the policy whereas the eight LAs in early implementation were selected on a number of criteria including a track record of ability to deliver innovative policies.
- The funding rates paid from DfE to the four LAs during early rollout were the rates that will be paid in September 2017. The additional development funding in early rollout was less than in early implementation which created conditions more akin to those that will prevail during the national rollout when there will be no development funding.

The four LAs participating in early rollout were purposefully selected to further test delivery in four specific conditions: high eligibility for the extended hours, rurality, high PVI (private, voluntary and independent) provision and high deprivation levels. The LAs had a range of contextual characteristics across labour market conditions, affluence/deprivation, rurality, and ethnic mix. Local childcare provision was predominantly by PVI providers in two of the LAs and more mixed in the other two. The funding rates paid from DfE to the LAs were identical across three of the LAs and notably higher in the fourth, while the local rates paid from LAs to providers varied by provider type and with the payment of supplements for specific conditions. While three LAs used

their own local method for checking parental eligibility for the extended hours, one LA was testing the national online eligibility checking system (the childcare service). Finally, it is worth noting that early years staff in one LA reported being significantly challenged in the implementation of early rollout by a recently downsized early years team and with the separate schools team joining the early rollout at a later stage.

## Findings

Early rollout confirmed many of the findings from early implementation under conditions that were more similar to the national rollout. This means that many of the recommendations for the national rollout from early implementation are reiterated here with minor modifications.<sup>4</sup> In order to facilitate comparison with the early implementation evaluation, the evidence from early rollout is structured in a similar way around seven questions.

#### 1. Were providers willing to offer the extended hours?

As in early implementation, a high proportion of providers in the early rollout areas (83 percent of providers delivering the free entitlement and 62 percent of all registered providers) were willing and able to deliver the extended hours and the patterns of delivery across provider types reflected the local mix of provision. The proportion of providers delivering the extended hours was substantially lower in one LA, but this is likely to have been due to a smaller proportion of children being eligible and the specific local implementation challenges faced by this LA.

As in early implementation, providers delivering the extended hours were doing so for positive reasons around supporting the policy (61 percent) and the business opportunity that it offered (34 percent), but were also responding to parental requests for the extended hours (63 percent) and LA encouragement to deliver them (51 percent).

Early rollout provided new evidence on providers not delivering the extended hours. As shown in table 1, awareness of the 30 hours free childcare was almost universal among all registered providers. Most of those not delivering the extended hours during early rollout were offering the additional hours<sup>5</sup> (6 percent of all registered providers) or planned to offer them (10 percent of all registered providers). Only 12 percent of all registered providers reported that they did not plan to offer the extended hours.

<sup>&</sup>lt;sup>4</sup> These modifications are documented in the main body of the report, but only the final early rollout recommendations are presented in this Executive Summary.

<sup>&</sup>lt;sup>5</sup> These providers were offering the extended hours to parents but did not currently have any children in their care to whom they were delivering the extended hours.

	Private	Voluntary	Childminder	Maintained	All types
Currently delivering	83%	76%	61%	59%	71%
Offering but not currently delivering any places	3%	6%	13%	1%	6%
Not currently offering but planning to offer in the future	7%	6%	12%	18%	10%
Not currently offering and not planning to offer in the future	8%	12%	14%	21%	12%
Not aware of the policy	<1%	0%	1%	0%	<1%
Total	100%	100%	100%	100%	100%
Number of providers	446	169	417	135	1,193

#### Table 1: Providers current delivery and plans to deliver extended hours

Source: Early Rollout Evaluation Survey of Providers, 2017

Notes: Providers offering but not currently delivering any places were those who were offering the extended hours to parents but did not currently have any children in their care to whom they were delivering the extended hours. Proportions greater than 0 percent and less than 0.5 percent are indicated by <1%.

Those not yet offering the extended hours but planning to do so were primarily waiting due to a lack of immediate demand, but some were waiting for spaces to become available in September or needed time to prepare their processes or adjust provision, while a small proportion were waiting to see how the policy developed. Almost half of the 12 percent of providers who were not currently offering and not planning to offer the extended hours reported that one reason was that the funding level was too low, while smaller proportions reported reasons related to other specific issues with the policy; resource constraints (such as a shortage of staff or venue space); or lack of demand.

As in early implementation, the key factor that shaped providers' decisions to deliver the extended hours in the early rollout was the anticipated impacts that the offer would have on their business. However, it may take some time for providers to fully consider the financial implications and reach longer term decisions around continuing to deliver the extended hours and the number of places to offer.

The evidence from the case studies showed that the key factors supporting the engagement of providers were:

• An efficient LA early years infrastructure with experienced early years advisers with close links to providers; training and business support programmes for

providers; and provider networks and newsletters to provide a steady stream of information about the offer.

- Local events to launch the offer including 30 hours briefings to begin a dialogue about the opportunities and challenges of delivering the extended hours, with opportunities for providers to ask questions and share ideas and experiences.
- Tailored advice and guidance for settings to explore different options for delivering the offer, ideally with a named LA contact and proactive visits to providers not offering the extended hours to identify and potentially address the barriers.
- Minimising the risk of any "admin nightmare" by ensuring a "smooth journey" for providers through effective systems for checking parents' eligibility codes, making claims and receiving payment.

Most providers delivering the extended hours in the early rollout (66 percent) reported that they had received sufficient support from the LA. However, one quarter would have liked more support and the primary need was for more, better and earlier information about the policy for both providers and parents. A substantial proportion also suggested that more business support and assistance checking parents' eligibility codes would have been helpful.

The evidence supports the following recommendations for the national rollout:

(A) Providers of all types are likely to be willing to offer the extended hours, but there is a need to recognise that different types may face different challenges in delivery and the kind of support offered will need to reflect this variation.

(B) An important issue in recruiting providers to deliver the extended hours will be to address the uncertainty about the financial implications by providing business support at the local level.

(C) The design of local and national processes needs to support the participation of providers by being efficient and reliable.

# 2. Were providers able to offer sufficient hours and were there any adverse impacts on other provision?

As in early implementation, the quantitative evidence from early rollout did not indicate any insufficiency in the delivery of the extended hours to meet demand. The evaluation survey of providers also showed that:

• 36 percent of providers had increased occupancy due to the delivery of extended hours (that is, had used spare capacity).

- 40 percent had increased staff hours or the number of staff in order to deliver the extended hours.
- 31 percent could definitely offer more free entitlement places and 27 percent could possibly (but not definitely) offer more places.

The case study evidence from early rollout indicated that some parents were not able to use the number of extended hours they wanted or use them when they wanted them. These difficulties were partly related to a lack of time to plan to increase provision and partly due to the more limited spare capacity in the summer term of the school year.

There were no indications of any substantial adverse effects on other free entitlement and paid provision, although LAs were closely monitoring any early signs of adverse effects on free entitlement provision. However, early rollout also highlighted a case in one LA illustrating potential adverse effects on other types of free provision: it was reported by the early years staff that an existing local programme offering ten additional free hours to more disadvantaged three and four year olds will be phased out because of the extended hours and disadvantaged children with parents who are not working will no longer receive free additional hours.

As in early implementation, the evidence suggested that expansion in provision could be limited by staff recruitment difficulties or limited venue space (particularly for playgroups using shared venues). In addition, early rollout showed that low demand for extended hours could be a barrier to expansion, particularly for playgroups in disadvantaged areas and for childminders in areas with traditionally low parental demand for childminding provision and where childminder engagement with the free entitlement is low.

The evidence supports the following recommendations for the national rollout:

(D) Compared with early implementation, the early rollout tested sufficiency in conditions more akin to those in the national rollout, but it is still recommended that a national level review of sufficiency in the delivery of extended hours places and impacts on other types of provision would be helpful in April 2018 when demand will be peaking for the summer term and the policy has had more time to establish itself across all LAs.

(E) In case a substantial expansion in capacity is required to meet the demand for the extended hours, consideration could be given to the sharing of any learning on facilitating utilisation of existing building space (currently being explored by some early innovators); provision of capital funding for small and large expansion projects; and continued support for increasing the supply of good practitioners through the Early Years Workforce Strategy presented in March 2017.

### 3. Did providers work in partnerships?

The evidence from early rollout showed that partnership working can support providers to deliver the extended hours and is encouraged by the greater need for shared care with the introduction of the extended hours. Indeed, 11 percent of providers reported in the evaluation survey that they had formed new partnerships to offer the extended hours. There is a potential role for LAs to support the development of partnerships in order to support the delivery of the extended hours, especially those involving childminders and out-of-school clubs.

The evidence supports the following recommendations for the national rollout:

(F) LAs need to actively support the development of new and effective partnerships.

(K) To help support the use of multiple providers, national or local training and workshops for providers could promote good shared care practice for children using multiple providers. Consideration could also be given to the provision of information and example cases for parents on how to manage a good package of care when using multiple providers.

#### 4. How flexible and free were the extended hours?

As in early implementation, most providers delivering the extended hours did not need to extend their opening hours as they were already offering full-day provision, but 12 percent had increased their opening hours in response to the extended hours. However, only 19 percent of voluntary providers and 10 percent of maintained providers (and 64 percent of private providers) delivering the extended hours were open throughout the year (shown in table 2). The proportions were slightly lower for providers not delivering the extended hours. This may limit the ability of many providers to offer to spread the extended hours throughout the year.

Early rollout provided new information on opening hours for providers not delivering the extended hours. These providers were less likely to be open continuously throughout the day than those delivering the extended hours (77 percent compared to 95 percent) and this difference was substantially larger for voluntary and maintained providers (shown in table 2). There were similar patterns in opening times with providers not delivering the extended hours less likely to open before 9am or after 3pm than those delivering the extended hours. The finding that most providers not delivering the extended hours were open continuously throughout the day and for an extended day shows that insufficient opening hours was not a primary reason that providers were not delivering the extended hours. However, the substantial proportions who were not open continuously indicates that a substantial number of providers not currently delivering the extended hours would only offer them if they changed their opening hours or shared care with another provider.

	Private	Voluntary	Childminder	Maintained	All types	
		·	·			
Percentage open year ro	und					
Providers delivering extended hours	64%	19%	94%	10%	61%	
Providers not delivering extended hours	45%	3%	88%	7%	54%	
Percentage open continuously throughout the day						
Providers delivering extended hours	95%	91%	98%	94%	95%	
Providers not delivering extended hours	76%	55%	94%	48%	77%	
Number of providers						
Providers delivering extended hours	369	129	253	80	847	
Providers not delivering extended hours	77	40	163	55	345	

#### Table 2: Opening times for providers delivering and not delivering extended hours

Source: Early Rollout Evaluation Survey of Providers, 2017

Notes: See table 3 in section 2.2 for a description of the provider types. Italics indicate statistics based on samples of less than 50.

As in early implementation, most providers delivering the extended hours (90 percent) reported that they offered parents a free choice or at least some choice in when they took the extended hours. However, there were several ways in which some providers limited parental choice mainly to ensure that the offer did not undermine the setting's financial viability. In addition, some providers sought other means to help ensure financial viability. Around 17 percent of providers had introduced or increased additional charges for parents because of the extended hours. In the case studies, some parents reported that they made payments associated with the extended hours and were not always clear what the charges were for. More broadly, some parents were paying nothing or substantially less than they had previously and regarded the offer as a huge financial help. Other parents had expected the extended hours to result in a larger saving on their childcare bill and some were paying more than they had before because they had increased the hours of childcare. Some parents understood that settings had to charge for additional costs to remain financially viable, but others resented the additional charges.

The degree to which the extended hours were "flexible and free" was closely related to how providers were achieving a financially sustainable business model to deliver the extended hours. Compared with early implementation, evidence from the early rollout showed that some providers had a better understanding and more confidence about developing what they considered financially viable models for delivering the extended hours in different ways, with support and advice from LA early years staff. Day nurseries appear to have particularly benefited from the financial models developed during the early implementation. The early rollout evidence from providers and LAs suggested that DfE was playing a stronger role than had been observed in early implementation in helping LAs to guide providers to develop business models which both supported their financial sustainability and were within the guidelines for the free entitlement provision.

The evidence from the early rollout suggests the following recommendation for the national rollout:

(G) DfE should continue to fully engage with LAs to support providers to develop financially sustainable models of delivery for the extended hours which ensure consistency of interpretation and application of the guidelines on flexibility, additional charges and parental payments for additional hours.

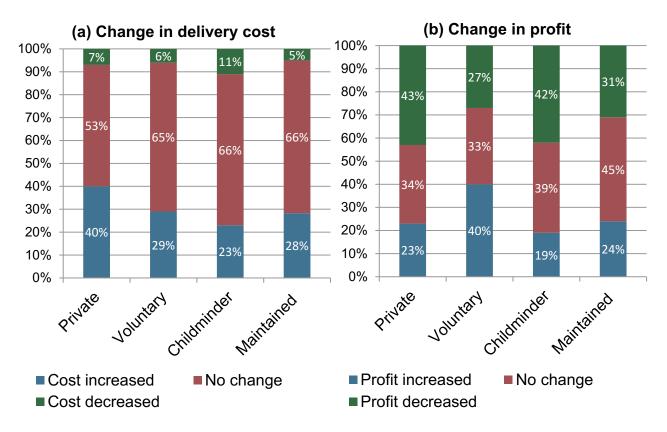
### 5. What was the financial impact for providers?

As in early implementation, providers delivering the extended hours in the early rollout reported mixed financial impacts from delivering the extended hours, although the tendency was towards higher costs and lower profits. In the evaluation survey of providers:

- 60 percent of providers reported that there had been no impact on the hourly delivery cost per child<sup>6</sup>, while 8 percent reported that the cost had decreased due to the delivery of the extended hours and 32 percent reported it had increased.
- 37 percent of providers reported that there had been no impact on profits, while 24 percent reported that profits had increased due to the delivery of the extended hours and 39 percent reported they had decreased.

Private providers were most likely to report an impact on costs, while private and voluntary providers were most likely to report an impact on profits (figure 1). For voluntary providers, the proportion reporting a positive impact is notably larger than those reporting a negative impact.

<sup>&</sup>lt;sup>6</sup> Throughout, cost refers to the cost for each child per hour, sometimes termed the "unit cost".



#### Figure 1: Financial impacts on providers

Source: Early Rollout Evaluation Survey of Providers, 2017

Notes: Sample sizes for private, voluntary, childminder and maintained are 347, 121, 245 and 74 in panel (a) and 302, 97, 241 and 58 in panel (b). Delivery cost is hourly cost per child. Maintained providers may have interpreted the question on profit as asking about "surplus" rather than profit strictly defined.

As in early implementation, the overall financial impact on providers depended upon a combination of (a) the impact of the change in the balance of the income source from parental fees to free entitlement funding and (b) any impact of delivery of the extended hours on delivery cost. However, the early rollout evidence from the survey of providers suggested two new insights on the financial impacts:

- The change in income source increased and reduced profits for roughly equal proportions of providers delivering the extended hours.
- Delivery costs were not reduced to any substantial degree by increases in occupancy, but were increased by other factors including rises in hourly staff pay and adjustments to provision needed to deliver the extended hours.

The evidence supports the following recommendations for the national rollout:

(H) In future reviews of funding rates in the Early Years National Funding Formula (EYNFF), there is a need to be explicit about the level of service that the funding rates are expected to support in terms of quality and flexibility. In addition, these reviews need to consider the drivers of ongoing changes in delivery costs.

### 6. How did parents use the extended hours?

Most parents used the full additional 15 hours for their child, but a substantial proportion (44 percent) used fewer hours. Almost one in five children (18 percent) using the extended hours received free entitlement hours from more than one provider. As in early implementation, once aware of the offer, parents were positive about the policy and were generally sufficiently self-serving to approach providers for a place. There was also evidence of a number of positive impacts on families from using the extended hours including direct benefits to the child; increased work flexibility; reduced stress as less juggling was required to minimise childcare costs and less reliance on grandparents for informal care; and improved family finances. In some cases, the additional help with childcare costs made a big difference, as illustrated by a quote from one parent:

"Two years ago I was nearly crying at the price of childcare. Now I'm laughing really compared with what I was paying at the beginning [before becoming entitled to the universal entitlement as well as extended hours]."

However, the evidence from the one LA using the childcare service during early rollout identified several difficulties with the parent application process in this service. These difficulties created considerable uncertainty for parents (and providers) and have highlighted the crucial importance of an effective system to support parental take-up of the offer.

Parents also suggested that better information is needed on charges for extras and the limitations applied by individual providers on the use of the free entitlement as this would enable parents to "shop around".

The evidence supports the following recommendations for the national rollout:

(I) Active marketing through childcare providers and LA publicity can assist parental take-up, particularly while the policy is still relatively new and the more usual word-of-mouth dissemination is less influential. Assistance with understanding how individual providers limit the use of extended hours and make charges should have higher priority than assistance with brokerage to find a place.

### 7. What challenged and what supported implementation?

The key reported challenges to implementation were:

- The name of the policy: calling it "30 hours" and "free" was seen by some providers and parents as raising false expectations.
- The short timescales: the amount of time to prepare for early rollout was found to be unrealistic for LAs and providers, particularly as it took time for key information about the offer to become available and for parents' eligibility to be confirmed.

• The negative publicity and misinformation in the national media: as this LA early rollout manager explained:

"... national media messages that come out aren't clear enough and haven't been helpful in many examples, because actually they're firing it up to fail really and so it's a negative thing and it's not clear enough, which does then lead to confusion and misunderstanding..."

 Uncertainty about the accuracy of the eligibility estimates and level of parental take-up: some LA early years staff felt that the DfE eligibility estimates and local data collected to estimate parental take-up were too approximate for planning purposes.

The key facilitators for implementation were:

- A well-resourced LA early years team: this was seen as key to supporting implementation and evidence from an LA where the early years team had been substantially reduced showed the crucial importance of having sufficient experienced early years staff.
- Having developed comprehensive plans for the national rollout prior to engagement with the early rollout: considerable preparatory work in two of the LAs meant that they *"hit the ground running"* when they signed up for the national rollout.
- Support of a multi-service team within the LA: including support from Family Information Services, communications and IT.
- A strong and positive relationship between the LA and providers: this allowed LA staff to have frank and constructive discussions about the challenges of delivering the extended hours.
- The support provided by DfE and HMRC officials: while there were some difficulties around the testing of the childcare service and the slow flow of information (particularly around the time of the election), LA staff reported that officials were quick to respond and DfE help in determining whether emerging delivery models were in line with the guidance was particularly appreciated.

The role of Childcare Works (the national delivery support organisation contracted by DfE) was reported to have been very limited in the early implementation because they had only recently been appointed, while their contribution was more noticeable in the early rollout. The facilitation of national and cluster meetings by Childcare Works and their website and newsletter were reported to have been very useful. Some LA early years staff thought that review meetings with Childcare Works were helpful and that Childcare Works were quick to respond to queries and had provided helpful consultancy on different aspects of delivery, such partnership working, ratio modelling and SEND.

However, others reported that the review meeting discussions showed that Childcare Works did not fully appreciate the challenges faced by LAs and providers and that Childcare Works were slow to respond to their questions.

The evidence supports the following recommendations for the national rollout:

(L) Consideration should be given to how DfE can most effectively support LAs to implement the policy, including ensuring adequate funding for staff resources to fully implement the policy; direct DfE encouragement of senior level sponsorship within the LA; and providing timely information to LAs on the plans for the national communications strategy.

(M) For the national promotion of the policy, it would be useful to consider the need for simple, key positive messages to promote the policy to providers and parents; promotion of some of the additional benefits; robust responses to some well-publicised perceptions of problems; and how to separate out other broader childcare issues such as workforce development from the 30 hours free childcare.

## Limitations on learning from early rollout

It should be noted that there are some important limitations on how far lessons can be drawn from early rollout for the national rollout:

- Early rollout operated on a very short timeframe, particularly in the limited preparation time after LAs had been informed that they would be part of the early rollout.
- The timing of early rollout during the summer term meant that some parents would only be applying for one term of extended hours which may have affected the take-up of the extended hours.
- The evaluation evidence on sufficiency, take-up and impacts was collected in the first two months after the policy began but major policies like this one typically take much more time to fully embed. Relatedly, the evaluation did not include a survey of parents and very limited evidence was collected on initial impacts on families.
- Learning was limited by the fact that two of the four LAs had specific implementation issues which meant that parental demand was lower than it might otherwise have been and sufficiency of delivery was not fully tested.
- Schools had limited involvement in early rollout partly because there was little maintained provision in two areas and partly because schools were reported by LAs to be waiting until September to make any changes as they tend to require more time to plan adjustments to provision.

• Financial impacts may not have been fully captured because some providers may not have had enough time to fully understand the financial implications of delivering the extended hours and others were waiting until September to adjust their provision and financial model.

## Conclusions

Many of the findings from early rollout reinforce those from early implementation, suggesting that some of the caveats on those initial findings were not so important. Hence, the evidence from early rollout provides further support for the conclusion from early implementation that there is no specific reason to believe that 30 hours free childcare will not be a success. In particular:

- A high proportion of providers were willing and able to offer extended hours places and there was no evidence that financial implications were a substantial barrier to the delivery of the extended hours.
- Parents were keen to take up the extended hours and the numbers of children receiving extended hours were close to the estimated number of eligible children in two LAs.

Two further conclusions from early implementation could not be tested during early rollout but it is useful to note these findings again here:

- Take-up of the extended hours was associated with increases in the use of formal childcare; longer work hours for mothers and fathers; and some indication of higher work retention for mothers.
- There were additional perceived benefits for families in terms of enhanced work opportunities, direct financial support and broader wellbeing.

The evidence from early rollout led to only minor modifications to the recommendations from early implementation and reinforced that the key priorities should be:

- To be mindful of the policy technical details both at the national level and at the local level. Minor points of detail around the eligibility checking and payment processes or in the statutory guidance could be critical to ensuring that the policy is implemented in the way intended and achieves its objectives.
- Sufficient support from DfE to the LAs to adequately implement the policy including funding for staffing resources; clarity and active assistance on the guidance; and promotion of the policy at senior levels within LAs.
- Positive promotion of the ultimate objectives of encouraging parents to work and supporting working families financially and in broader measures of wellbeing

rather than a simple focus on the interim output of delivering more free entitlement hours.



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**Reference: DFE- RB732** 

ISBN: 978-1-78105-802-2

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