

Paediatric first aid 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 purely voluntary quality mark scheme to requiring all childcare staff to have PFA training. The preferred option is a quality mark scheme combined with 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 preferred option 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 direct cost to business (EANDCB) of £2.2 million. Using the DfE Childcare and Early Years Provider Survey, the Department 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 newly qualified staff 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.

In calculating the EANDCB, the Department has excluded about 45 per cent of the overall cost, which relates to provision of early years free entitlement for 2, 3 and 4 year olds. This has been excluded on the basis that it is private sector provision of a public service. Regulations affecting the private provision of a public service do not count as regulatory provisions under the SBEE Act 2015. The Better Regulation Executive has confirmed that the Department's approach is consistent with the new better regulation framework.

Quality of submission

The Department has addressed satisfactorily the comments in the Committee's previous Green-rated opinion at consultation stage, dated 4 August 2015, through two key changes to the IA.

Cost of the initial PFA certificate

The RPC questioned the assumption in the consultation stage IA that all of the costs relating to the initial PFA certificate would be absorbed by public sector training providers. Following the consultation, the Department now has evidence to support an estimate that 29% of this cost will be passed on to childcare employers. This is estimated to cost an additional £0.74million each year.

Benefits of the proposal

In the consultation stage IA, the Department provided a break-even analysis on the basis of whether injuries averted are all relatively minor or all more serious. The Department now provides a weighted average cost of injuries to 0-4 year olds using evidence on the cost of injuries of different levels of severity and the distribution of these injuries. On this basis, if the proposal results in a 40 per cent fall in the average number of injuries in childcare settings, the benefits would match the costs. It is difficult for the Department to predict how likely this fall is. The IA points to evidence from the National Day Nurseries Association (paragraphs 17 to 23), which found lower accident rates in nurseries where high numbers of staff are trained, as staff are more aware of safety issues and act to prevent injuries in the first place. This section of the IA would be improved by consideration of two possibilities. First, whether the presence of a trained PFA provider could result in other workers being

less careful. Second, the potential for selection bias in the data, as schools with more trained staff are likely to be more conscientious overall.

Small and micro business assessment (SaMBA)

The Department provides 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 per cent had more than 20 members of staff. A large proportion of the benefit of the policy would be lost by full or even partial exemption of small and micro-businesses. The Department provides figures for the average expenditure and income of a nursery and indicates that additional cost to a nursery could amount to only about 0.1 per cent of this. The Department's recommended option is much less costly to business than two of the other options assessed in the IA. These options require a higher proportion of staff to have PFA training. The Department considers that the new implementation date of September 2016 will help mitigate impacts on these businesses. 82 per cent of consultation stage respondents were in favour of this implementation date.

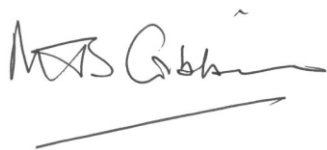
Initial departmental assessment

Classification	IN
Equivalent annual net cost to business (EANCB)	£2.15 million
Business net present value	-£33.9 million
Societal net present value	-£36.7 million (benefits not quantified)

RPC assessment

Classification	IN
Equivalent annual net cost to business (EANCB) ⁱ	£2.2 million
Small and micro business assessment	Sufficient

Opinion: final stage IA
Origin: domestic
RPC reference number: RPC15-DfE-3001(3)
Date of implementation: September 2016



Michael Gibbons CBE, Chairman

ⁱ For reporting purposes, the RPC validates EANCB figures to the nearest £100,000.